



THE STATE
of **ALASKA**
GOVERNOR SEAN PARNELL

**Department of
Environmental Conservation**

Office of the Commissioner

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December 10, 2013

Dennis McLerran, Regional Administrator
U.S. EPA Region 10
1200 6th Avenue, Suite 900 (Mail Stop RA-140)
Seattle, WA 98101

Dear Mr. McLerran:

On behalf of Governor Parnell, the Alaska Department of Environmental Conservation (DEC) provides the following recommendation for the initial designation of areas with respect to the final rule "National Ambient Air Quality Standards for Particulate Matter" issued by the U.S. Environmental Protection Agency (EPA) on December 14, 2012 and published in the Federal Register on January 15, 2013 (78 FR 3086). In that action, EPA strengthened the annual National Ambient Air Quality Standard (NAAQS or standard) for particulate matter 2.5 micrometers or less in diameter (PM_{2.5}) from 15.0 µg/m³ to 12.0 µg/m³. Clean Air Act Section 107(d)(1)(A) requires the State of Alaska to submit area designation recommendations and appropriate boundaries to EPA for this revised standard by no later than December 14, 2013.

DEC Air Quality Division staff performed analyses to determine appropriate designation for areas throughout Alaska using criteria outlined in the U.S. EPA's guidance memorandum (<http://www.epa.gov/airquality/particlepollution/dsignations/2012standards/techinfo.htm#A>). Based on their analyses, as described below, no areas within the State of Alaska exceed the annual PM_{2.5} standard of 12.0 µg/m³.

Determination of attainment/non-attainment is based on comparing a three-year average of the annual average concentration to the level of the standard (design value) for the time period 2010-2012. The three-year rolling averages are updated after the year's monitoring data is reviewed and certified. Below are the EPA PM_{2.5} Design Values for the time period 2010 – 2012 for Alaska:

State	County	Site ID	PM _{2.5} Annual Design Value in µg/m ³
Alaska	Anchorage Municipality	020200018	6.0
Alaska	Fairbanks North Star Borough	020900010	11.5
Alaska	Juneau City and Borough	021100004	7.4
Alaska	Matanuska-Susitna Borough	021700008	6.6

Only the Fairbanks North Star Borough is close to the revised annual standard for PM_{2.5}. DEC submitted a 2010 Exceptional Events Request Waiver to EPA Region 10 in August 2013 for 4 days of wildland fire smoke emissions. If approved, the 4 'high' days will be removed from the 2010 data, resulting in a design value of 11.3 µg/m³ for the Fairbanks North Star Borough for the period

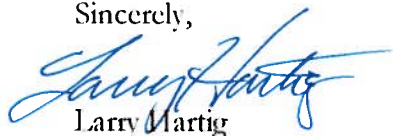
2010 – 2012. The four events were treated as one due to the multitude of active fires during the four days; the event was natural, it was not reasonably controllable or preventable, it affected air quality in the FNSB, and there would have been no exceedance except for the event. If EPA only approves the waiver for the highest value, an exceedance ($44.5 \mu\text{g}/\text{m}^3$), the design value rounds to $11.5 \mu\text{g}/\text{m}^3$.

The Alaska IMPROVE (Interagency Monitoring of Protected Visual Environments) speciation data for the years 2010 – 2011 was also reviewed and indicates there are no $\text{PM}_{2.5}$ air quality issues at the four IMPROVE sites located in the Aleutians East, Denali, Matanuska-Susitna and Yukon-Koyukuk census areas/boroughs.

By the time EPA makes its final designations, 2013 monitoring data will also be available for review and DEC expects that EPA will base its final designations on 2011-2013 $\text{PM}_{2.5}$ data. At this time, DEC does not expect the attainment status to be different with the addition of 2013 data.

Consequently, Alaska recommends the entire state be classified as “unclassifiable/ attainment” with respect to the 2012 annual $\text{PM}_{2.5}$ NAAQS. Please accept this letter as an initial designation recommendation in accordance with the requirements of Section 107(d)(1)(A) of the Clean Air Act. Alice Edwards is available to your staff to respond to questions or to otherwise assist. She can be reached at (907) 465-5109. As always, I would be pleased to discuss any of this with you.

Sincerely,



Larry Martig
Commissioner

cc: Kate Kelly, EPA Region 10
Debra Suzuki, EPA Region 10
Lucy Edmondson, EPA Region 10
Alice Edwards, Director, Division of Air Quality, DEC
Barbara Trost, Program Manager, Air Monitoring & Quality Assurance, DEC
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