

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION
OFFICE OF THE COMMISSIONER

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December 14, 2007

Elin D. Miller, Regional Administrator
Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Re: Alaska Governor's Recommendation for PM_{2.5} Area Designation

Dear Ms. Miller:

On behalf of Governor Palin, the Alaska Department of Environmental Conservation provides the following recommendations for designation of areas for the revised fine particle air quality standard (PM_{2.5}). Please accept this letter as an initial designation in accordance with the requirements of Section 107(d)(A) of the Clean Air Act.

Air quality measurement data was collected for the past three years in four areas of Alaska: Anchorage, Fairbanks, the Mendenhall Valley in Juneau, and the Butte area in the Matanuska-Susitna Borough. The data shows only one community that is exceeding the health based 24-hour exposure limit of 35 micrograms per cubic meter ($\mu\text{g}/\text{m}^3$) of air: Fairbanks. The Mendenhall Valley in Juneau is very close, but not exceeding the standard limit based on the 2004-2006 data. The situation in Juneau will need to be closely monitored as data collection continues into the future. All the monitoring sites showed attainment for the annual exposure limit of $15\mu\text{g}/\text{m}^3$.

Compliance with the health standard was determined by evaluating three years of ambient monitoring data in accordance with EPA's requirements under 40 CFR Part 50 Appendix N. The annual design value is the three year average of the annual means of the observed concentrations at each site. The 24-hour design value for each monitoring site is based on the 98th percentile concentration observed for each year, averaged over three years. Table 1 lists the 24-hour and annual design values for the four monitoring locations in comparison to the health standards:

Table 1. Comparison of Alaska's PM_{2.5} Design Values with the PM_{2.5} Health Standards

PM _{2.5} Design Value	Health Standard, ($\mu\text{g}/\text{m}^3$)	Anchorage, ($\mu\text{g}/\text{m}^3$)	Fairbanks, ($\mu\text{g}/\text{m}^3$)	Mendenhall Valley, Juneau, ($\mu\text{g}/\text{m}^3$)	Butte, Matanuska-Susitna Borough*, ($\mu\text{g}/\text{m}^3$)
24-hour	35	26	43	35	31
Annual	15	6.7	11.0	7.8	6.0

* Note: The data for the Butte area in the Matanuska-Susitna Valley is missing for the second and third quarters in 2004. See enclosure for additional information.

Based on this data, Table 2 provides Alaska's designation recommendations:

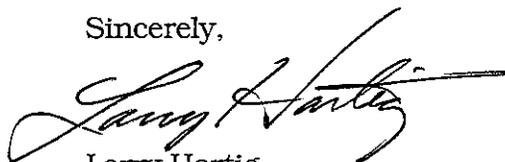
Table 2. Alaska's PM_{2.5} Designation Recommendations

Community/Area	Designation Recommendation	
	Annual Standard	24-hour Standard
Anchorage	Attainment	Attainment
Fairbanks	Attainment	Non-Attainment
Mendenhall Valley, Juneau	Attainment	Attainment
Butte, Matanuska-Susitna Borough	Attainment	Attainment
Other Areas of Alaska	Attainment	Unclassifiable

In 2004, Alaska recommended that the Environmental Protection Agency designate all areas of the state in attainment for the annual standard of 15 μ g/m³. We believe that with the retention of the standard at the same level, our original recommendation still holds true for all areas of Alaska. However, with the increased stringency of the 24-hour standard and increasing fuel costs that have renewed interest in wood-fueled heating, we cannot be certain that all areas of Alaska are in attainment. Therefore, we recommend that those areas which do not have monitoring data be designated unclassifiable. Enclosed is supporting information and analysis regarding these designation recommendations as well as our recommended boundary for a Fairbanks 24-hour PM_{2.5} non-attainment area.

Please contact Tom Chapple, Air Quality Division Director, at (907) 269-7634 if you or your staff has any questions about Alaska's recommendations for the fine particle, PM_{2.5}, air quality standards.

Sincerely,



Larry Hartig
Commissioner

cc: The Honorable Sarah Palin, Governor
Jim Whitaker, Mayor Fairbanks North Star Borough
Rod Swope, City Manager, City & Borough of Juneau

Enclosure