United States Department of the Interior

FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:

FWS/ANWS-AR-AQ

August 23, 2010

Ms. Alice Edwards, Acting Director
Division of Air Quality
Alaska Department of Environmental Conservation
PO Box 111800
Juneau, AK 99501

Subject: Regional Haze State Implementation Plan Comments

Dear Ms. Edwards:

On June 23, 2010, the State of Alaska submitted for Federal Land Manager review the proposed revisions to the Alaska State Air Quality Control Plan [State Implementation Plan (SIP)], describing its proposal to improve air quality regional haze impacts at mandatory Class I areas across your region. We appreciate the opportunity to work closely with the State through the initial evaluation, development, and, now, subsequent review of this plan. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS) and the National Park Service (NPS), have received and conducted a substantive review of your proposed Regional Haze Rule implementation plan in fulfillment of your requirements under the federal regulations 40 CFR 51.308(i)(2). Please note, however, that only the U.S. Environmental Protection Agency (EPA) can make a final determination regarding the document's completeness and, therefore, ability to receive federal approval from EPA.

As outlined in a letter to each State dated August 1, 2006, our review focused on eight basic content areas. The content areas reflect priorities for the Federal Land Management agencies, and we have enclosed comments associated with these priorities. We look forward to your response, as per section 40 CFR 51.308(i)(3). For further information, please contact Tim Allen (FWS) at (303) 914-3802 or Pat Brewer (NPS) at (303) 969-2153.

TAKE PRIDE IN AMERICA

Again, we appreciate the opportunity to work closely with the State of Alaska and compliment you on your hard work and dedication to significant improvement in our nation's air quality values and visibility.

Sincerely,

Sandra V. Silva, Chief
Branch of Air Quality
Fish and Wildlife Service

John Bunyak, Acting Chief
Air Resources Division
National Park Service

Enclosure (1)

cc:

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U.S. Fish and Wildlife Service
And
National Park Service
Comments Regarding
Alaska Regional Haze Rule State Implementation Plan
August 23, 2010

On June 23, 2010, the State of Alaska submitted the Alaska State Air Quality Control Plan [State Implementation Plan (SIP)] Revision for the Regional Haze Program, pursuant to the requirements codified in Federal rule at 40 CFR 51.308(i)(2), to the U.S. Department of the Interior, U.S. Fish and Wildlife Service (FWS) and National Park Service (NPS).

The air program staff of the FWS and NPS has conducted a substantive review of the Alaska plan and provides the comments listed below. We are providing these comments to the State and ask that these be included in the official public record. We look forward to a response as per section 40 CFR 51.308(i)(3), and we are willing to work with the Alaska Department of Environmental Conservation (ADEC) staff towards resolving any of the issues discussed below. For further information, please contact Tim Allen with FWS at (303) 914-3802 or Pat Brewer (NPS) at (303) 969-2153.

Overall Comments

Overall the Alaska draft SIP is comprehensive and well written. It has a descriptive Executive Summary, a detailed discussion of monitoring data, source contributions, and existing regulations.

Specific Comments

Chapter K.3 Alaska and Air Quality

1. The SIP should include a commitment to future air quality monitoring to support the regional haze demonstration.

2. *Page K.3-12 and page K.4-46:* EPA's *Guidance for Tracking Progress under the Regional Haze Rule* lists Denali Headquarters as the official IMPROVE site and Trapper Creek as the protocol site. NPS will be providing additional comments in a separate letter regarding the IMPROVE monitoring sites and park description.

3. *Section E. Bering Sea Wilderness Area (pg K.4-118)*: While monitoring data are not available for the Bering Sea, Alaska needs to consider source contributions and potential impacts to this wilderness area.

Chapter K.5 Emissions Inventory

1. *Section A: Baseline and Future-Year Inventories*: ADEC should clarify the emissions assumed for 2018 for the Golden Valley Electric Association (GVEA) – Healy Power Plant [Healy] Units 1 and 2, located less than four miles from Denali National Park. The Denali Borough 2018 emissions listed in Appendix III.K5 are much lower than the allowable emissions for Healy Unit 2, and supporting documentation in the current Title V renewal permit indicates Unit 2 will be restarted before the year 2018. If the Healy Unit 1 and 2 emissions were not included in the 2018 emission inventory, then the implications of not including the emissions should be discussed in the interpretation of the Weighted Emissions Potential (WEP) analysis for Denali.

2. *Section B: 2002 Baseline Inventory and Section D Inventories for Specific Source Categories (pg K.5-3 and K.5-4):* Alaska states that fire data were obtained from the WRAP Fire inventory efforts. ADEC should clarify if Alaska provided state-generated fire activity data to WRAP or if the WRAP relied on wildfire data from federal records. In addition ADEC should explain why the prescribed fire emissions appear to be extremely low, given the open burning discussion in Section K.9.C.1.

Chapter K.6 Best Available Retrofit Technology (BART)

1. Regarding the Agrium, Kenai Nitrogen Operations Plant, ADEC proposed that BART emission limits for nitrogen oxides, sulfur dioxide, and particulate matter for BART eligible units be set at zero, since the plant is not currently operating. Reducing the federally-enforceable emission limits for these units to zero, and specifying that a new Prevention of Significant Deterioration (PSD) permit application, review, and approval, would be needed prior to any future operation of the units, is acceptable to us for meeting the Regional Haze Rule obligations for this source.

2. In a letter dated March 11, 2010, the National Park Service commented on Alaska's BART determination for GVEA's Healy Plant Unit 1. At this time, a response to these comments has not been received. The major concern identified in the letter was Alaska's determination that Selective Non-catalytic Reduction (SNCR) is considered BART for Healy Unit 1 based on a remaining useful life of eight years (shutdown in 2024). The BART guidelines (40 CFR 51, Appendix Y, Section IV.D.4.k.2) require that if the shutdown date "affects the BART determination, this date should be assured by a federally- or State-enforceable restriction preventing further operation." Alaska must make the shutdown of Healy Unit 1 in 2024 legally enforceable. If the shutdown is not made legally enforceable, then BART would be the use of Selective Catalytic Reduction as previously determined by Alaska.

Chapter K.9 Reasonable Progress Goals

1. *Section 2. Identification of Sources for Four Factor Analysis (pg K.9-4):* Alaska needs to demonstrate that it is making reasonable progress in reducing anthropogenic emissions within the state. Alaska's approach to determine which source categories to evaluate is appropriate. Alaska should extend the analysis to consider feasible controls for individual sources within these sources categories. The WRAP point source pivot tables identify the major individual sources within each source category. Visibility impacts from sources exempted from BART (e.g., Anchorage Municipal Light &Power, and Conoco Phillips Alaska Inc) and Healy Unit 2 are not negligible and controls for these sources should be considered as part of the reasonable progress analysis. CALPUFF could be used to consider the cumulative visibility impacts of the major industrial sources.

2. *Section E:* ADEC should clarify that the reasonable progress goals for 2018 were set by comparing the percentage changes in anthropogenic contributions between 2002 and 2018 from the WEP analyses to the target uniform rate of progress by 2018.

3. In the Reasonable Progress section, the SIP should mention the anthropogenic sources near Bering Sea (e.g. oil and gas production) and how the emissions changes between 2002 and 2018 for these sources might affect visibility in the Bering Sea Wilderness area.