



FAIRBANKS STATE IMPLEMENTATION PLAN AND EPA PROPOSED ACTION

Nick Czarnecki

ANPMS Program Manager

Alaska Department of Environmental Conservation

February 2, 2023



OVERVIEW

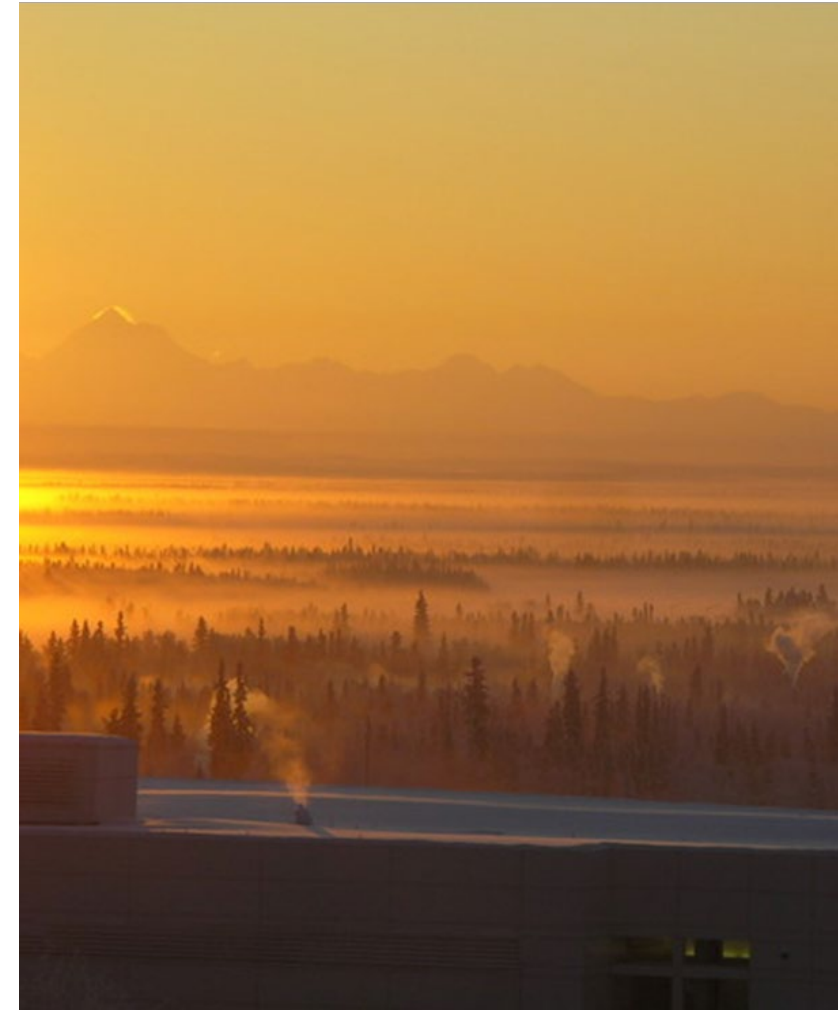
GOALS: HEALTHY AIR, STRONG ECONOMY,
USE OF WOOD STOVES, APPROVABLE SIP

- What is in EPA's Proposed Action?
 - Proposed Approval of SIP elements
 - Proposed Disapproval of SIP elements
 - Next steps
 - Comment on EPA's proposed action
 - Prepare SIP Amendment
 - Potential timeline
 - What actions can FNSB Assembly take?
-

WHAT IS IN THE ACTION?

ELEMENTS FOR PROPOSED APPROVAL

- Base year emission inventory
- NOx precursor determination
- VOC precursor determination
- NH3 BACM/BACT and control strategy analysis
- Solid fuel BACM
 - Curtailment program
 - Opacity limits
 - Date certain removal of uncertified devices
- Incinerator BACM
- Mobile source controls
 - CARB standards
 - School bus retrofits
 - Road paving
- Contingency measures as SIP strengthening



WHAT IS IN THE ACTION?

ELEMENTS FOR PROPOSED DISAPPROVAL

- Point source SO₂ controls
 - Did not meet BACM for highest control
 - Point source PM controls
 - Lack of MRR and permit conditions not incorporated in SIP
 - Contingency measures
 - Not sufficient to meet 1-year Reasonable Further Progress
 - BACM
 - ULSD requirement
 - Requirements for wood sellers
 - Residential coal fired heating devices
 - Coffee roasters
 - Char broilers
 - Used oil burners
 - Weatherization
 - Vehicle idling
 - Other transportation measures
 - Attainment year inventory
 - Attainment demonstration
 - Reasonable Further Progress
 - Motor Vehicle Emission Budgets
 - Quantitative Milestones
-

NEXT STEPS IS THERE A PATH TO MEET ALL THE GOALS?

- Healthy Air • Strong Economy • Maintain Use of Wood Stoves • Approvable SIP
- Large gaps between Alaska SIP and EPA proposal:
 - Point source SO₂ control strategy
 - Solution: New modeling platform supporting SO₂ Precursor demonstration
 - ULSD Mandate
 - Solution: New compelling information supporting economic infeasibility



NEXT STEPS

HOW DO WE GET THERE?

- Healthy Air
- Strong Economy
- Maintain Use of Wood Stoves
- Approvable SIP



Two Separate Actions

- Provide comments during comment period
 - Short time frame, due March 31
 - Can't resolve all issues in disapproval during comment period
 - SIP Amendment
 - Longer time frame
 - Required for regulatory changes and modeling updates
-

SUMMARY OF STATE STRATEGY – COMMENT PERIOD

- Comments from community – the more the better
- ADEC Comments
 - Provide compelling new information that will inform agency decision making
 - New information for economic analysis of ULSD vs #1 Heating Oil
 - SO2 Precursor: Explain how EPA should not base decisions on obsolete modeling platform
 - Explain where new regulations will address EPA concerns





SUMMARY OF STATE STRATEGY – SIP AMENDMENT

- SIP Amendment – elements to an approvable SIP
 - SO₂ Precursor demonstration
 - New regulations
 - Updated components: Modeling, Attainment demonstration, MVEB, Inventory, QMs, etc.
-

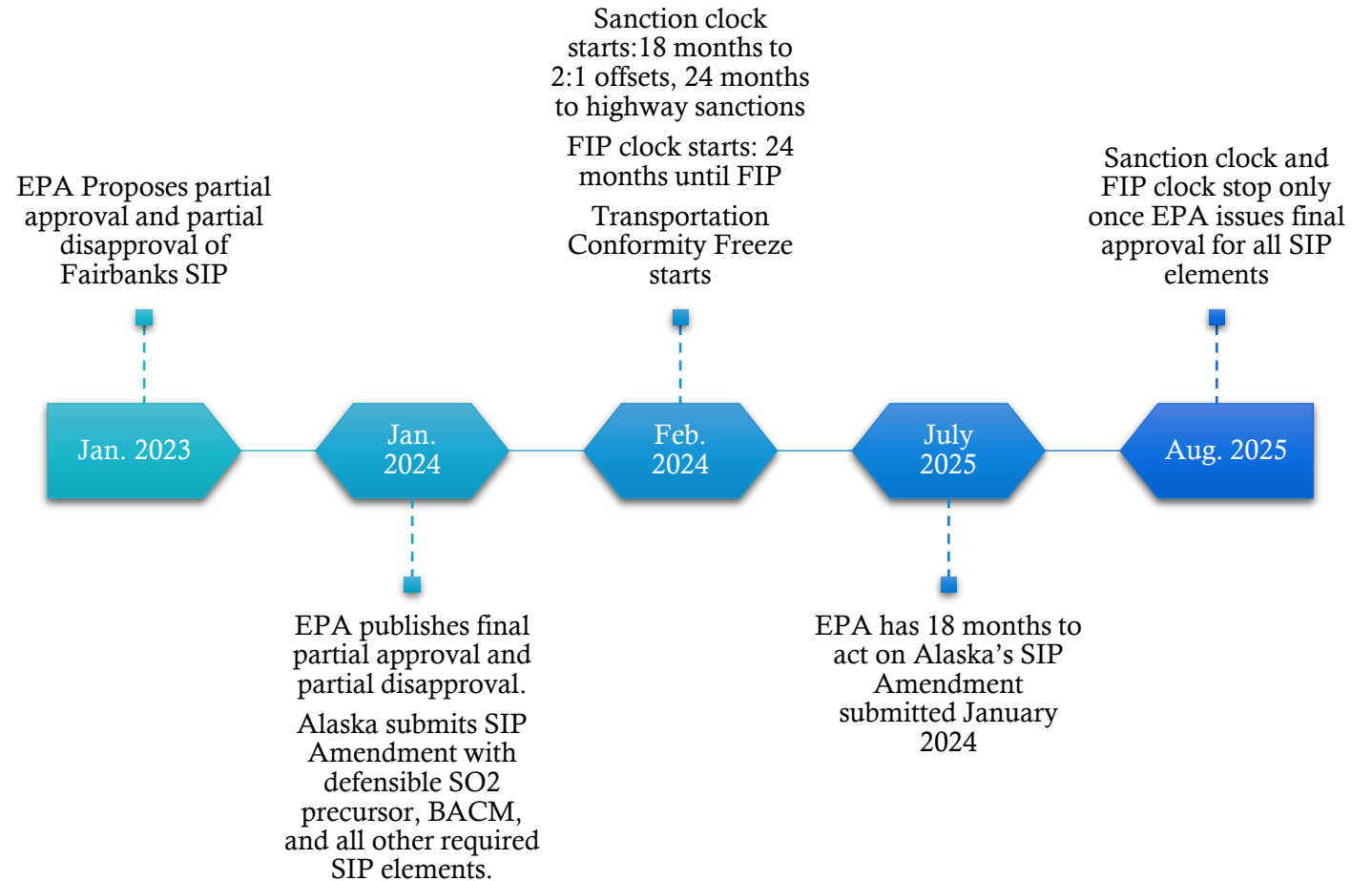
SUMMARY OF STATE COMMENTS

- USLD – New information for economic dismissal
 - Coffee Roasters – Modify regulation
 - Char broilers – Updated information for technical/economic dismissal to address EPA concern
 - Transportation Control Measures (TCMs) – New information for economic dismissal
 - Used Oil – Updated information for technical/economic dismissal to address EPA concern
 - Weatherization – New regulation
 - Wood seller requirements – Modify regulation
 - Residential coal heating appliances – Modify regulation
-

SUMMARY OF COMMENTS CONTINUED

- Point Source BACT
 - SO₂ Precursor to address EPA concerns regarding SO₂ control strategy
 - Modify permits to address MRR
 - Add permits to SIP

POTENTIAL TIMELINE





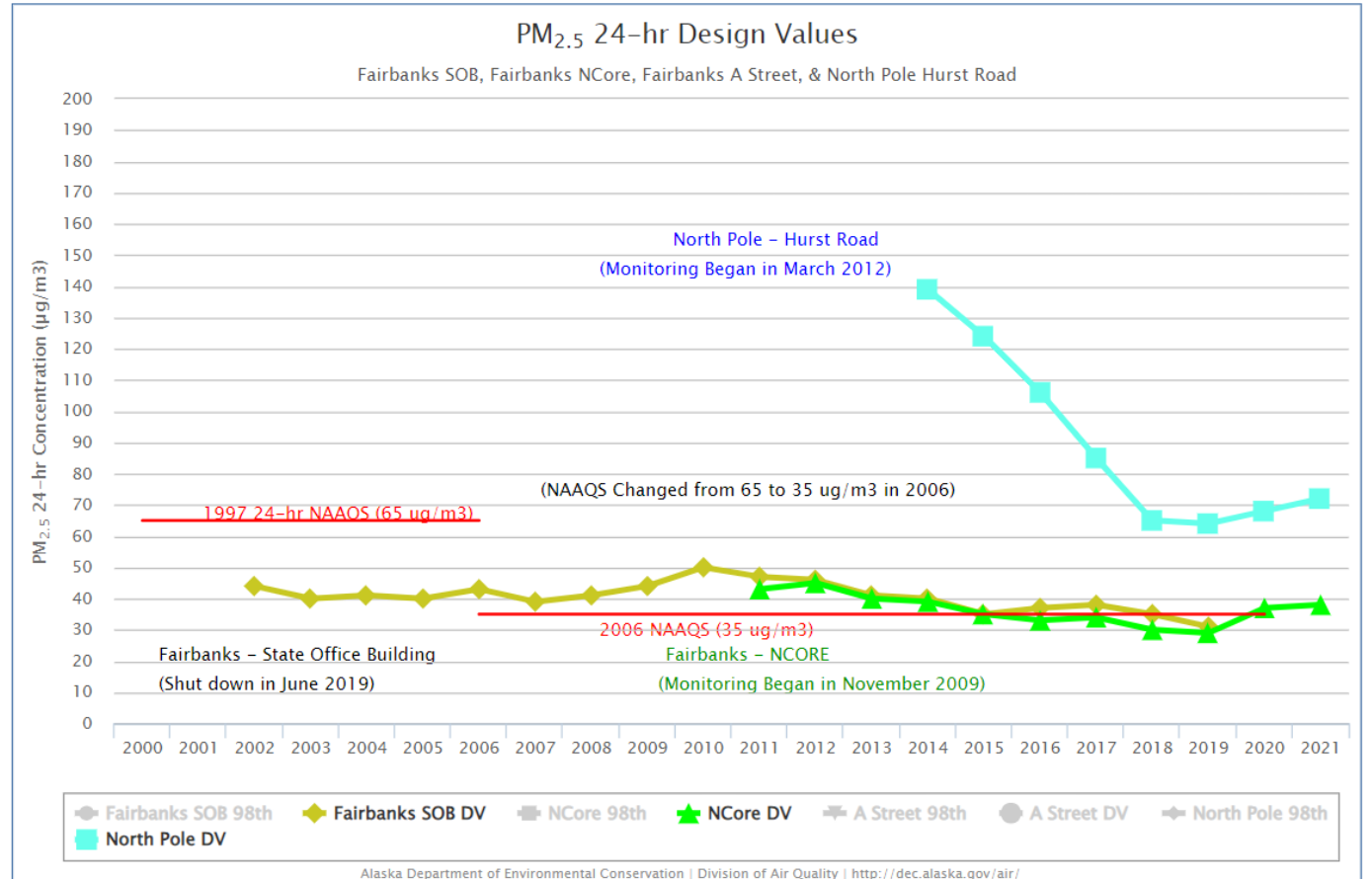
WHAT ACTIONS CAN YOU TAKE?

- Support Collaborative ADEC & FNSB Staff Comments w/Resolution
- Provide comments independently
- Encourage members of community to comment
- 2 ways to comment
 - Written comment due March 13, 2023
 - EPA to host public hearing in Fairbanks, TBD – likely early March
- DEC is available to explain what is in EPA's proposed action so that entities can form their own position

NEW STANDARD

- EPA proposed new lower PM_{2.5} standards on January 6, 2023
- Encourage members of community to comment

<https://www.epa.gov/pm-pollution/national-ambient-air-quality-standards-naaqs-pm>



QUESTIONS?

Nick Czarnecki

ANPMS Program Manager

Alaska Department of Environmental Conservation

nick.czarnecki@alaska.gov

