



## ATTACHMENT 11

### Alaska Department of Environmental Conservation Determination of ASAP PM2.5 Emissions Below De Minimis Threshold for Fairbanks Air Quality



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THE STATE  
of **ALASKA**  
GOVERNOR BILL WALKER

Department of Environmental  
Conservation

DIVISION OF AIR QUALITY  
Air Non-Point Mobile Sources

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March 9, 2016

Sandy Gibson, Project Manager  
USACE Alaska District Regulatory Division  
P.O. Box 6898  
JBER, Ak 99506

Dear Ms. Gibson:


This letter is in regards to the Alaska Stand Alone Pipeline/ASAP Project's Fairbanks PM<sub>2.5</sub> Nonattainment Area Emissions Inventory & General Conformity Applicability Analysis dated November 18, 2015 along with the subsequent response to questions received January 21, 2016 by electronic transmission. After careful review, the department confirms that the project is below the *de minimis* threshold of 100 tons per year and therefore a full general conformity analysis is not required. This determination hinges on the project fulfilling a number of commitments for mitigating emissions, including contracting the use of Tier 4 engines.

Please inform the Air Quality Division if any major changes to the project occur, or if there are major changes to the assumptions that were used for the basis of the applicability analysis. If such changes were to occur, the applicability analysis would likely need to be revisited to ensure that it continues to meet the 100 ton *de minimis* threshold.

Particular attention should be given, during construction activities, to take reasonable precaution per 18 AAC 50.045(d) to prevent fugitive dust. Also, if the preferred method for disposal of debris in the development of any raw land is by open burning, "reasonable procedures to minimize adverse environmental effects and limit the amount of smoke generated" must be used, as well as acquiring any applicable permits. A complete description of the open burn guidance policy can be found at <http://dec.alaska.gov/air/ap/docs/obrguide.pdf>. A general requirement of the Air Quality Control Regulations is that wastes should be burned in a manner that does not cause a public health, safety or welfare threat, an environmental problem or a nuisance.

Thank you for contacting us about your project. If you have further questions or concerns about air quality issues, you may contact me at (907) 269-7579 or by e-mail at [cindy.heil@alaska.gov](mailto:cindy.heil@alaska.gov).

Sincerely,

  
Cindy Heil  
Program Manager, ANPMS

Clean Air