

Alaska Oil and Gas Association



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Kate Williams, Regulatory and Legal Affairs Manager

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Air and Radiation Docket and Information Center
U.S. Environmental Protection Agency
Mailcode: 6102T
1200 Pennsylvania Ave., NW.
Washington, DC 20460

Re: Comments on EPA's Proposed Rule to Revise the National Ambient Air Quality Standards for Particulate Matter, Docket ID No. EPA-HQ-OAR-2007-0492

Dear Docket Clerk:

The Alaska Oil and Gas Association (AOGA) appreciates the opportunity to provide comments on the U.S. Environmental Protection Agency's (EPA) proposed rule to revise the air quality criteria and national ambient air quality standards (NAAQS) for particulate matter (PM). AOGA is a business trade association whose mission is to foster the long-term viability of the oil and gas industry for the benefit of all Alaskans. AOGA's membership includes 16 companies representing the breadth and scope of the industry in Alaska, both onshore and offshore.

AOGA endorses the comments on the proposed rule being submitted by the American Petroleum Institute (API) and encourages EPA to consider and incorporate the suggestions contained therein. We would like to emphasize the following issues detailed in API's comments.

AOGA supports API's comments explaining why the proposed revisions to the NAAQS for PM are not appropriate. Specifically, the scientific record does not support a finding that the existing NAAQS are no longer requisite to protect public health and welfare.

- EPA's rationale for lowering the annual NAAQS for PM_{2.5} to a level below 15 µg/m³ is not based on a sound scientific approach and therefore does not "accurately reflect the latest scientific knowledge."
- EPA has not adequately justified the proposed change to the form of the annual NAAQS.
- The Administrator's determination to retain the existing primary PM₁₀ NAAQS to protect against the risk of health effects of coarse particles is reasonable.
- EPA has no basis for revising the secondary PM NAAQS.
- EPA should not change the air quality index.

In addition, AOGA supports the comments on the implementation issues that the Agency must address promptly in the event that revisions are made to the suite of PM air quality standards. Implementation issues must be resolved in conjunction with adoption of new NAAQS or revision of existing ones. Tools necessary to implement new NAAQS must also be available when NAAQS are promulgated. In particular, the Agency must issue guidance on how applicants for Prevention of Significant Deterioration (PSD) program permits are to address the requirement for demonstrating compliance that a proposed new or modified source will not cause or contribute to a violation of even the existing PM_{2.5} NAAQS.

The oil and gas industry in Alaska has a long history of partnership with EPA to help ensure that oil and gas operations do not adversely impact the environment, and we look forward to continuing this productive relationship into the future. If you have any questions regarding AOGA's comments, please do not hesitate to contact me.

Sincerely,



KATE WILLIAMS
Regulatory and Legal Affairs Manager