

production facilities located on Alaska's North Slope approximately six times and became personally familiar with the large amount of air pollution generated from these facilities. I visited the Prudhoe Bay Unit as part of several of these trips.

4. I traveled to the North Slope's Prudhoe Bay Unit in 2007 and I will travel there again in the future. I am excited to return to the North Slope in the future and share my aesthetical and scientific enjoyment of the area with friends and family.

5. Over the years, because of my professional career, I became aware of the large amount of air pollution generated from oil production at the North Slope.

6. I was diagnosed with Ocular Melanoma, specifically, a choroidal tumor of the left eye. I have been informed that Melanoma (cancer of pigmented areas of the body, such as skin and eyes) is generally more severe in areas with stratospheric ozone depletion, particularly on the North Slope, where the North American "ozone hole" is located.

7. I am aware that depletion of atmospheric ozone can cause increased risk of developing melanoma due to exacerbation of UV radiation, which has been linked to numerous health issues including skin cancer and human immune system depression.

8. I am concerned about the effects of the air pollution on the scenic and aesthetic values of the North Slope which I enjoy. Through my research, I learned

that the air pollution in the North Slope is equivalent to that of the Washington D.C. area.

9. I am negatively impacted by the air pollution and ozone depletion in my area and am concerned about the health of myself, my wife, my neighbors, and my children.

10. I am concerned that Alaska Department of Environmental Conservation's policy of disaggregation on the North Slope, adversely effects my personal health and the ecosystem, because the unique climatic conditions of the Arctic intensify the degradation of the stratospheric ozone layer and pollutant laden fog. I am concerned that the negative impacts of air pollution will adversely impact my health and overall viability of the ecosystem I enjoy.

11. I am concerned that Alaska Department of Environmental Conservation and the United States Environmental Protection Agency ("EPA") have granted preferential treatment to the oil and natural gas industry by granting pollution control permits on a disaggregated sub-unit basis, instead of correctly and lawfully treating this contiguous and adjacent property under common control as one facility for PSD permitting.

12. I am concerned that EPA's failure to object the Title V operating permit for BP Exploration (Alaska) Gathering Center #1 greatly contributes to the air pollution in the region in which I live, work and recreate and degrades the

ambient air quality and my health.

13. I am concerned that haze is resulting from the air pollution created by the North Slope oil production facilities, including the BP Exploration (Alaska) Gathering Center #1 and the other sources of air pollution in the Prudhoe Bay Unit.

14. I am aware that regional haze is an ever increasing problem in the North Slope area. This haze appears as an ugly brown cloud that covers the various portions of the North Slope. In the past, I enjoyed an excellent view of the Alaskan sky. The haze impairs my visibility and looks ugly, which detracts from my overall enjoyment of the aesthetic value of my surroundings in the North Slope. I know from my professional experience and research that the pollution from the North Slope and the emission sources in the Prudhoe Bay Unit contributes to the formation of this haze.

15. In working with the Air Quality Program of the Alaska Department of Environmental Conservation, I learned that the majority of the nitrogen monoxide migrates to the stratosphere, where it reacts with ozone. Thus, North Slope air pollution including air pollution from emission sources in the Prudhoe Bay Unit is responsible for the North American “ozone hole.” The higher UV radiation caused by the “ozone hole” has been linked to numerous health issues including skin cancer and human immune system depression. Total emissions from the BP Exploration (Alaska) Gathering Center #1 and other emission sources in the

Prudhoe Bay Unit are underreported because they do not include pollutant emissions from non-road engines, and there are numerous small sources that have not been included in any of the permits for the Prudhoe Bay Unit emission sources.


16. I am harmed by EPA's decision not to object to the Title V Operating permit for the BP Exploration (Alaska) Gathering Center #1, because this permit violates the Clean Air Act by failing to aggregate all contiguous and adjacent sources of pollution under common control within a single Title V operating permit and because the decision also fails to treat all of the emission units in the Prudhoe Bay Unit as one source for Prevention of Significant Deterioration purposes.

17. By objecting to the Title V Operating permit for the BP Exploration (Alaska) Gathering Center #1, EPA would address my concerns and I would be more certain that I am not being and will not be in the future exposed to illegal amounts of air pollution when I am at the North Slope and particularly when I am near the Prudhoe Bay Unit. By EPA objecting to the Title V Operating permit for the BP Exploration (Alaska) Gathering Center #1, I would also be more certain that I am not suffering from and would not in the future be suffering from the harmful effects of illegal amounts of air pollution such as a decrease in the stratospheric ozone layer.

18. I have a substantial interest in this matter and am adversely affected and aggrieved by the Administrator's failure to comply with the Clean Air Act. The requested relief will address my injuries by curtailing the impact of air pollution in the North Slope and decreasing the amount of atmospheric ozone depletion, leading to an enhancement of my health and relief over my concerns about air pollution.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

12/2/2007
Date



Bill MacClarence