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Your Touchstone Energy® Cooperative 

February 19, 2021

Submitted via email  
*Dave.jones2@alaska.gov*

Alaska Department of Environmental Conservation  
Air Quality Division, Air Permits Program  
ATTN: Dave Jones  
PO Box 1111800  
Juneau, AK 99811

**SUBJECT: Comments Regarding Preliminary Permit Decision for North Pole Power Plant Air Quality Control Minor Permit AQ0110MSS01 and Air Quality Operating Permit No. AQ0110TVP04, Revision 1**

Golden Valley Electric Association (GVEA) has reviewed the preliminary Minor Permit No. AQ0110MSS01 and the accompanying Technical Analysis Report. GVEA has also reviewed the preliminary Operating Permit No. AQ0110TVP04, Revision 1 and the accompanying Statement of Basis. Pursuant to 18 Alaska Administrative Code (AAC) 50.326(k) and 18 AAC 50.542(d), GVEA submits the attached comments.

If you have any questions or would like any additional information please contact Naomi Morton Knight, P.E. by phone at 907-458-4557 or by email at [nmknight@gvea.com](mailto:nmknight@gvea.com).

Sincerely,

Naomi Morton Knight  
Environmental Officer

Attachment

cc: A. Riste, SLR

**COMMENTS: Preliminary Air Quality Control Minor Permit No. AQ0110MSS01**

GVEA respectively requests to remove language that is ~~struck-out~~ and add language that is underlined.

Permit Comments

1. Condition 3.1 – Please revise Condition 3.1 and add an additional provision as follows. Golden Valley Electric Association (GVEA) receives receipts with the information in items a. and b under Condition 3.1 with each shipment. However, only the additional information in items c. through e. is available in a certified statement from the supplier.

~~X.X~~ For each shipment of fuel, keep receipts that specify fuel grade, date, and quantity of fuel received.

- 3.1 ~~Upon receipt of~~ For each shipment of fuel, obtain a certified statement from the supplier with the following information:
  - ~~a. The date and time of the fuel delivery;~~
  - ~~b. The quantity of fuel received;~~
  - ae. The sulfur content in the fuel oil (ppmw);
  - bd. The method of analysis; and
  - ce. A statement that the analysis was representative of the fuel oil delivered.

2. Condition 3.2 – Please revise as follows to clarify that a representative sample of the fuel shipment must be analyzed. GVEA does sample the 50,000 gallon tank on a monthly basis per Condition 10.1.b in the Air Quality Operating Permit AQ0110TVP04.

If a certificate is not available from the supplier, analyze a representative sample of the fuel shipment to determine the sulfur content using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

3. Condition 5.3 – Please revise Condition 5.3 and add an additional provision as follows. See Comment No. 1 for Condition 3.1 for a basis of the proposed changes.

~~X.X~~ For each shipment of fuel, keep receipts that specify fuel grade, date, and quantity of fuel received.

- 5.3 ~~Upon receipt of~~ For each shipment of fuel, obtain a certified statement from the supplier with the following information:
  - ~~a. The quantity of fuel received;~~
  - ab. The sulfur content in the fuel oil (ppmw or wt%);
  - bc. The method of analysis; and
  - cd. A statement that the analysis was representative of the fuel delivered.

4. Condition 5.4 – Please revise as follows. See Comment No. 2 for Condition 3.2 for a basis of the proposed changes.

If a certificate is not available from the supplier, analyze a representative sample of the fuel shipment to determine the sulfur content using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

#### Technical Analysis Report Comments

5. Second paragraph of Introduction (3) and Tables 5 through 7 – Please revise PM<sub>2.5</sub> to PM-2.5 for consistency. The acronym is listed in the permit.
6. First bulleted item under Application Description – Please update as follows for clarity and to correct typographical error.

Add a condition that beginning no later than October 1, 2020 requires deliveries of fuel to the stationary source for EUs 1 and 2 be limited to fuel with a sulfur content of no greater than 1,000 parts per million by weight (ppmw) immediately after an North Pole Zone Air Quality Stage Alert 1 or 2 ~~is are~~-announced, and for as long as the alert is in place;

7. Table 2, Table 5, Table 6, and Table 7 – Please update to include the two insignificant boilers included in the application to revise the Air Quality Operating Permit AQ0110TVP04. The emissions for the boiler are listed below:

Nitrogen oxides (NO<sub>x</sub>) – 1.0 tons per year (tpy)  
Carbon monoxide (CO) – 0.2 tpy  
Volatile organic compounds – 0.02 tpy  
Particulate matter less than 10 microns (PM-10) – 0.2 tpy  
Particulate matter less than 2.5 microns (PM-2.5) – 0.2 tpy  
Sulfur dioxide (SO<sub>2</sub>) – 3.5 tpy  
Carbon dioxide equivalent (CO<sub>2</sub>e) – 1,105 tpy  
Hazardous air pollutants – 0.004 tpy

**COMMENTS: Preliminary Air Quality Operating Permit No. AQ0110TVP04, Revision 1**

Please remove language that is struck-out and add language that is underlined.

Permit Comments

1. Condition 2.3.a – Please update this condition to include reference to EU ID 7 which is an affected unit under the requirement.

First Method 9 Observation. Except as provided in Condition 2.2 or Condition 2.5.c(ii), observe the exhausts of EUs 1, 2, 5, 6 and 7 according to the following criteria:

2. Condition 2.3.a(iii) – Please update this condition as follows to be consistent with Standard Permit Condition IX – Visible Emissions and Particulate Matter Monitoring Plan for Liquid Fuel-Burning Equipment and Flares revised July 22, 2020.

(iii) For any unit replaced, observe exhaust within 60 days of the newly installed emissions unit becoming fully operational.<sup>3</sup> Except as provided in Condition 2.3.e, after the First Method 9 observation:

(A) For EUs 1, 2, 5, and 6, continue with the monitoring schedule of the replaced emissions unit; and

(B) For EU 7 comply with Condition 1.2.

(iv) For EU 7, observe the exhaust of the emissions unit within 30 days after the end of the calendar month during which monitoring was triggered under Condition 1.2; or for an emissions unit with intermittent operations, within the first 30 days during the unit's next scheduled operation.

3. Condition 2.5.c(i) – Please update this condition to correct the condition citation to 2.4.

conduct smoke/no smoke observations in accordance with Condition 2.4 ~~2.5.a~~

4. Condition 10.1.a – Please update this condition as follows to be consistent with Standard Permit Condition XI – SO<sub>2</sub> Emissions From Liquid Fuel-Burning Equipment.

For ~~for~~ each shipment of fuel:

(i) If the fuel grade requires a sulfur content ~~less than~~ 0.5 percent by weight (wt%<sub>Sfuel</sub>) or less, keep receipts that specify fuel grade and amount; or

(ii) If the fuel grade does not require a sulfur content ~~less than~~ 0.5 wt%<sub>Sfuel</sub> or less, keep receipts that specify fuel grade and amount and

(A) test the fuel for sulfur content; or

(B) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent; or

5. Condition 10.1.b – Please revise as follows. The monthly testing option is available for any or all of the emissions units (EUs). If this option is used for one EU does not necessarily mean it needs to be used for all the EUs.

Test the sulfur content of the fuel in each storage tank that supplies fuel to EUs 1, 2, 5, ~~and~~ or 6, at least monthly.

6. Condition 11.2.d – Please update this condition as follows to be consistent with Standard Permit Condition XI – SO<sub>2</sub> Emissions From Liquid Fuel-Burning Equipment.

for any fuel received with a sulfur content greater than 0.75 wt% S<sub>fuel</sub>, the ~~calculated~~-SO<sub>2</sub> emissions in ppm calculated under Condition 10.3.

8. Condition 24.1 – Please revise as indicated under Comment No. 1 for Condition 3.1 in the draft Minor Air Quality Control Permit AQ0110MSS01.
9. Condition 24.2 – Please revise as indicated under Comment No. 2 for Condition 3.2 in the draft Minor Air Quality Control Permit AQ0110MSS01.
10. Condition 26.3 – Please revise as indicated under Comment No. 3 for Condition 5.3 in the Minor Air Quality Control Permit AQ0110MSS01.
11. Condition 26.4 – Please revise as indicated under Comment No. 4 for Condition 5.4 in the Minor Air Quality Control Permit AQ0110MSS01.
12. Condition 27.4 – Please revise as follows to be consistent with Standard Permit Condition V – Insignificant Emissions Units.

**General MR&R for Insignificant Emissions Units.** The Permittee shall comply with the following:

- a. ~~The Permittee shall submit~~ Submit the compliance certifications of Condition 78 based on reasonable inquiry;
- b. ~~The Permittee shall comply~~ Comply with the requirements of Condition 59;
- c. ~~The Permittee shall report~~ Report in the operating report required by Condition 77 if an emissions unit has historically been classified as insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and current actual emissions become greater than any of those thresholds; and
- d. No other monitoring, recordkeeping or reporting is required for insignificant emissions units to demonstrate compliance with the emissions standards under Conditions 27.1, 27.2, and 27.3.

[18 AAC 50.040(j)(3), 50.326(j)(3), & 50.346(b)(4)]

[40 C.F.R. 71.6(a)(1) & (3)]

13. Footnote 8 – Please revise as follows for consistency. The term “Administrator” is defined in the Alaska State Regulation and should be referenced. This is consistent with Footnote 8 in Permit No. AQ0237TVP03 for the Doyon Utilities, Joint Base Elmendorf Richardson.

~~For Section 4 of this permit, the~~ The Department defines “Administrator” in 18 AAC 50.990(2) to mean the EPA Administrator and the Department.

14. Condition 76.1 – Please revise as follows to be consistent with Standard Permit Condition III – Excess Emissions and Permit Deviation Reports.

**Excess Emissions Reporting.** Except as provided in Condition 59, the Permittee shall report all emissions or operations that exceed emissions standards or limits of this permit as follows:

Statement of Basis Comments

15. Table C – Please update emissions to include the two insignificant boilers included with the application. The emissions for the boiler are listed below:

Nitrogen oxides (NO<sub>x</sub>) – 1.0 tons per year (tpy)  
Carbon monoxide (CO) – 0.2 tpy  
Volatile organic compounds – 0.02 tpy  
Particulate matter less than 10 microns (PM-10) – 0.2 tpy  
Particulate matter less than 2.5 microns (PM-2.5) – 0.2 tpy  
Sulfur dioxide (SO<sub>2</sub>) – 3.5 tpy  
Carbon dioxide equivalent (CO<sub>2</sub>e) – 1,105 tpy  
Hazardous air pollutants – 0.004 tpy