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October 4, 2021

Government Letter No. 48005
Sent Via Email: dave.jones2@alaska.gov

Dave Jones
Alaska Department of Environmental Conservation
Air Permit Program
PO Box 111800
Juneau, Alaska 99811

Re: Comments on Draft Renewal Operating Permit(s) AQ0072TVP04, AQ0074TVP04, and AQ0075TVP04 for Pump Stations 1, 3, and 4

Dear Mr. Jones,

Alyeska Pipeline Service Company (Alyeska) welcomes this opportunity to provide comments on draft Operating Permit Nos. AQ0072TVP04, AQ0074TVP04, and AQ0075TVP04 for Trans Alaska Pipeline System (TAPS) Pump Stations 1 (PS 1), PS 3, and PS 4. For the most part, our requested changes are common to each permit. The comments are attached.

Alyeska appreciates the Department's efforts in developing the renewal permits. If you have any questions or require further information, please contact me at (907) 787-8568 or Hilary Garney at (907) 787-8897.

Sincerely,

A handwritten signature in blue ink, appearing to read "Don Mark Anthony", with a long horizontal flourish extending to the right.

Don Mark Anthony
Air Quality Engineer

Attachment: Comments on Draft Renewal Operating Permit(s) AQ0072TVP04, AQ0074TVP04, and AQ0075TVP04 for Pump Stations 1, 3, and 4

Attachment:

Comments on Draft Renewal Operating Permit(s) AQ0072TVP04, AQ0074TVP04, and AQ0075TVP04 for Pump Stations 1, 3 and 4

Requested Changes:

Pump Stations 1, 3 and 4 Draft Permit Global NSPS GG/KKKK SO2 Monitoring Comment

Conditions 33.3 and 35.1 for PS 1, Condition 36.2b for PS 3, and Condition 35.2(b) for PS 4. The natural gas demonstration requirement is a one-time requirement which Alyeska has already completed. The demonstration was accepted by EPA (EPA Letter dated December 11, 2006). Alyeska conducted the demonstration using monitoring data, as allowed by 40 CFR 60.334(h)(3)(ii) and 60.4365(b). Both rules clearly state the owner or operator may elect not to monitor the sulfur content of the fuel by conducting the demonstration. Both rules do not indicate on-going fuel monitoring is required after that, otherwise, the rules would have stated so. 40 CFR 60 Subpart KKKK clarifies further in the heading of 40 CFR 60.4365 which is titled "How can I be exempted from monitoring the total sulfur content of the fuel?" which clearly implies, using common word definitions, that no on-going monitoring would be required. Furthermore, the rule preambles did not indicate additional sampling is required.

The Department has gap-filled the requirement to require additional monitoring by relying on language under 40 CFR 75 App. D Section 2.3.1.4(e) which indicates annual fuel sampling is required. Alyeska believes this was done in error by the Department since if Subpart GG and Subpart KKKK required additional monitoring it would have been included in the individual NSPS rules. Alyeska was unable to locate an EPA Applicability Determination addressing this issue specifically, however, the intent of the rules (Subparts GG and KKKK) is clear.

Therefore, Alyeska requests the Department reconsider gap-filling these rules and remove the on-going sulfur monitoring requirements. If the Department retains the requirement, Alyeska would like to point out that the fuel analysis is already being completed based upon the fuel sulfur MR&R under Condition 22.1 (PS 1), Condition 19.1 (PS 3), and Condition 19.1 (PS 4). As a result compliance with the NSPS sulfur standards is already assured.

Pump Station 1 Draft Permit No. AQ0072TVP04:

1. Section 1. Stationary Source Information: Stationary Source and Building Contact:
Requested change: Delete Jenna Miller/Monte Geerdes and replace with Verne Griffis/Nancy Lea.

Basis: Updates the facility contact information.

2. Requested Change: Revise Condition 43.1 as follows:

NESHAPs Subpart ZZZZ Reporting: For EU IDs 20 and 26, include in the operating report required by Condition 78, a report of any deviations as defined in 40 C.F.R. 63.6675

~~which occurred during the reporting period. for each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A as specified in Table 8 to Subpart ZZZZ was not met.~~

Basis: The deleted portion of Condition 43.1 does not appear in 40 CFR 63.6640(b) or 63.6650(f). The current wording of the condition could be misunderstood to require reporting only non-compliance with Subpart A. The proposed rewording of the condition captures the requirement to report all deviations as defined in Subpart ZZZZ, per the reporting requirements of 63.6650(f).

Pump Station 3 Draft Permit No. AQ0074TVP04:

1. Requested Change: Delete Condition 42.1.

Basis: The requirement to maintain manufacturer's data demonstrating compliance is only required for non-certified engines manufactured prior to 2007. For EU ID 27, compliance is based on EPA's Certification of Compliance for the engine model and model year. See Condition 40.4.

2. Requested Change: Modify Delete Condition 46.4 such that Condition 46.4.c does not apply to EU ID 21.

Basis: The requirement to install a non-resettable hour meter applies only to emergency engines. EU 21 is not an emergency engine.

3. Requested Change: Revise Condition 46.9 as follows:

NESHAPs Subpart ZZZZ Reporting: For EU IDs 15, 16, 20, and 21, the Permittee shall include in the operating report required by Condition 80, a report of any deviations as defined in 40 C.F.R. 63.6675 ~~which occurred during the reporting period. for each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A as specified in Table 8 to Subpart ZZZZ was not met.~~

Basis: The deleted portion of Condition 46.9 does not appear in 40 CFR 63.6640(b) or 63.6650(f). The current wording of the condition could be misunderstood to require reporting only non-compliance with Subpart A. The proposed rewording of the condition captures the requirement to report all deviations as defined in Subpart ZZZZ, per the reporting requirements of 63.6650(f).

Pump Station 4 Draft Permit No. AQ0075TVP04:

1. Requested Change: Delete Condition 41.1.

Basis: The requirement to maintain manufacturer's data demonstrating compliance is only required for non-certified engines manufactured prior to 2007. For EU ID 22, compliance is based on EPA's Certification of Compliance for the engine model and model year. See Condition 39.4.

2. Requested change: Remove EU 10 from Condition 45.1.

Basis: To ensure consistency across the TAPS Pump Station operating permits, Alyeska chooses to manage EU ID 10 as a non-emergency engine. This change has no bearing on operation, emissions, or existing maintenance practices.

3. Requested change: Add EU ID 10 to Condition 45.2.

Basis: To ensure consistency across the TAPS Pump Station operating permits, Alyeska chooses to manage EU ID 10 as a non-emergency engine. This change has no bearing on operation, emissions, or existing maintenance practices.

4. Requested Change: Modify/Delete Condition 45.4 such that Condition 45.4.c does not apply to EU ID 10 and EU ID 15.

Basis: The requirement to install a non-resettable hour meter applies only to emergency engines.

5. Requested Change: Revise Condition 45.9 as follows:

NESHAPs Subpart ZZZZ Reporting: For EU IDs 10, 14, and 15, the Permittee shall include in the operating report required by Condition 79, a report of any deviations as defined in 40 C.F.R. 63.6675 which occurred during the reporting period. ~~for each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A as specified in Table 8 to Subpart ZZZZ was not met.~~

Basis: The deleted portion of Condition 45.9 does not appear in 40 CFR 63.6640(b) or 63.6650(f). The current wording of the condition could be misunderstood to require reporting only non-compliance with Subpart A. The proposed rewording of the condition captures the requirement to report all deviations as defined in Subpart ZZZZ, per the reporting requirements of 63.6650(f).