

ADEC
Air Permits Program

Via email: joshua.klina@alaska.gov

RE: Comments on the Jarvis Street Power Plant Draft Title V Permit AQ0014TVP03

June 5, 2023

Dear Mr. Klina,

Thank you for the prompt response to our request for a Title V Renewal for the Jarvis Street Power Plant (AQ0014TVP03) and for the opportunity to review and comment on this draft permit. We appreciate the Department's cooperation and assistance in preparing this permit.

The following comments were developed by HMM Consulting, LLC and the City of Sitka. After careful review of the draft, we have only one question and a few typographical corrections.

Comment 1: Issue Date June 5, 2023

The draft permit cites an issue date of June 5, 2023. This date appears on the top-right corner of each page and on the cover page. However, it appears that this date may have been put in as a placeholder. Our understanding is that the public comment period ends June 5, and after that will be a period of days or weeks to incorporate any comments, and subsequently ADEC will initiate the EPA 45-day review period. So, we estimate that this permit will be issued sometime in Fall 2023. Also, it is our understanding that after the permit is issued, it becomes effective 30 days after that date. That would put the first day that this permit becomes effective sometime in the late Fall 2023 (estimated).

Is this understanding accurate, or should we expect to begin complying with this permit on June 5, 2023?

Comment 2: Footnotes

During the pre-public comment period, we pointed out several footnotes that appear as regular-sized text, rather than superscripts. While the Department made some corrections, it seems that this public comment draft has several more instances of the same error. Please review the contextual footnote references and ensure that they appear as superscripts. We found the following:

- Footnotes 9 and 10, page 12,
- Footnotes 11, 12, 13, page 15,
- Footnote 17, page 18,
- Footnote 19, page 20,
- Footnote 20, page 28,
- Footnote 21, page 33.

Comment 3: Grammatical correction to Condition 12.8(c)

At the Permittee's discretion, the NOx source test required in this condition may be conducted during winter in conjunction with the NOx source test required under NSPS Subpart KKKK in Condition 19.2, but no later than 12 months ~~of~~ after exceeding the 500-hour operational threshold in Condition 12.8.a.

Comment 4: Incorrect Cross Reference

The text of Condition 62.1 refers to Condition 36.1. We believe this reference should be to Condition 36, the head language for Assessable Emissions Estimates.

Sincerely,

Donna Celia
Project Manager
HMH Consulting, LLC in cooperation with the City and Borough of Sitka