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ALASKA LNG

Alaska LNG Liquefaction Plant Construction Permit
Application

Project Information Form Attachment 1:

**Information Reference Table for Alaska LNG
Liquefaction Plant**

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Attachment 1

Construction Permit Application Information Reference Table for Alaska LNG Liquefaction Plant

(Resource Reports from Exhibit F, Alaska LNG April 17, 2017 FERC application, Docket # CP17-178)

Citation (prefix varies)	Description	Project Information Required? (Y/N)	Information location reference	Remarks
n/a	ADEC Air Quality Construction Permit Application, Project Information Form (Project Information Form)	Y	The Project Information Form is the central document of this application, for which this table is Attachment 1 . Additional information related to Project Description (Section 9 of the Project Information Form) is available in <i>Resource Report 1 (Attachment 2)</i> : -a description of Liquefaction Plant is provided in Section 1.3.1, page 1-6 of <i>Resource Report 1</i> , and -a project construction schedule provided in Section 1.5.1, page 1-115 of <i>Resource Report 1</i> .	Section 11 of the <i>Project Information Form</i> provides comprehensive list of permit application attachments.
n/a	Larger Attachments	n/a		Many of the larger attachments contain bookmarks which help make navigation of those documents easier.
n/a	Preferred facility name	n/a	The preferred facility name is "Liquefaction Plant", or more broadly when referencing marine operations, "Liquefaction Plant and Marine Terminal". Other names, including "Liquefaction Facility", "LNG Facility" or simply "LNG" may be used in application documents to describe the facility.	
Applicable Federal PSD Regulations (40 CFR regulatory citation prefix)				
51, Appendix W	Guideline on Air Quality Models	Y	A modeling protocol for the Liquefaction Plant was submitted to the Department in October, 2017 and subsequently approved. The <i>ADEC Modeling Protocol Approval Letter</i> is included as Attachment 3 .	Attachment 3 also includes responses to comments made in the <i>Protocol Approval Letter</i> , as well as clarification of emissions and PSD applicability for lead, similar to that provided in response to the Department's March 6, 2018 incompleteness finding for the GTP application.
52.21 (a)(2)	Applicability procedures	Y	Section 7 of the Project Information Form provides summary classification of Liquefaction Plant (Plant) regarding major stationary source status/applicability. Additional information related to Liquefaction Plant "Potential to Emit" (PTE) is provided in <i>Resource Report 9 (Attachment 4)</i> , Section 9.2.5.1, starting on page 9-49. Details of the equipment design, fuel use, hours of operation, emission factors, projected load factors, and other operational considerations are provided in <i>Appendix D to Resource Report 9 (Attachment 5)</i> , pdf pages 127-225 (Appendix A to Appendix D).	Consistent with September 26, 2017 guidance from USEPA Region 10 to Oregon DEQ, AGDC believes the Plant should not be considered a "fuel conversion plant" per 40 CFR 52.21(b)(1)(i)(a). Regardless of its status as a "fuel conversion plant", the Plant would be "major stationary source" under 18 AAC 50.306 and 40 CFR 52.21(b)(1). Resource Report appendices such as Attachment 5 may have their own appendices, which follow the same lettering/order scheme. The designation "Appendix A to

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				Appendix D" is not a typo.
52.21 (h)	Stack heights	Y	Details related to Good Engineering Practice (GEP) stack heights for Liquefaction Plant emission units are provided in <i>Appendix D to Resource Report 9 (Attachment 5)</i> , Section 5.6, page 53.	
52.21 (j)	Control technology review	Y	Control technology review details are included in <i>Liquefaction Plant Best Available Control Technology (BACT) Analysis (Attachment 6)</i> .	Portions of the Liquefaction Plant BACT analysis are submitted "confidential" consistent with the requirements of AS 46.14.520.
52.21 (k)	Source impact analysis	Y	<p>A summary of source impact analysis demonstrating compliance with NAAQS, AAAQS and PSD increment is provided in <i>Resource Report 9 (Attachment 4)</i>, Section 9.2.5.1.3, starting on page 9-52.</p> <p>Details of source impact analysis are provided in <i>Appendix D to Resource Report 9 (Attachment 5)</i>.</p> <p>Modeling Files associated with the Liquefaction Plant source impact analysis are provided in <i>Liquefaction Plant Air Quality Modeling Files (Attachment 7)</i>.</p>	<p>Attachment 7 modeling files are provided only digitally and consist of the following folders:</p> <ul style="list-style-type: none"> • AERMOD • AERMOD_sensitivity • Ambient_Boundary • CALPUFF • CALPUFF Regional Haze • Emissions • Tall_Tower_Met_Analysis • VISCREEN • NOx_PM_Preconstruction Data
52.21 (l)	Air quality models	Y	<p>A summary of air quality models and versions used is provided in <i>Resource Report 9 (Attachment 4)</i>, Section 9.2.5.1.3, starting on page 9-52.</p> <p>Sensitivity analysis comparing modeling results for the current version of AERMOD vs the non-current AERMOD version used for Resource Report 9 is provided in <i>AERMOD Sensitivity Liquefaction Plant (Attachment 8)</i>.</p> <p>Modeling files supporting this sensitivity analysis are provided in <i>Liquefaction Plant Air Quality Modeling Files (Attachment 7)</i>.</p>	
52.21 (m)	Air quality analysis	Y	A description of Pre-Construction monitoring requirements and the approach for meeting those requirements are provided in <i>Pre-Construction Monitoring (Attachment 9)</i> .	The Project intends to meet pre-construction monitoring requirements through a combination of existing (Agrium) data and additional parameters to be monitored by the Project. Project monitoring data will be provided in a supplement to this application.
52.21 (n)	Source information	Y	Required source information is contained in the <i>Project Information Form</i> and in the Project Information Form	

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			attachments contained in this table.	
52.21 (o)	Additional impact analysis	Y	Required information is provided in <i>Liquefaction Plant Additional Impacts Analysis (Attachment 10)</i> . Modeling files supporting this analysis are provided in <i>Liquefaction Plant Air Quality Modeling Files (Attachment 7)</i> .	
52.21 (p)	Sources impacting Federal Class I areas	N	Required information is provided in <i>Liquefaction Plant Sources Impacting Class I Areas Additional Requirements (Attachment 11)</i> . Modeling files supporting this analysis are provided in <i>Liquefaction Plant Air Quality Modeling Files (Attachment 7)</i> .	
Other Applicable Federal Stationary Source Air Quality Regulations (40 CFR regulatory citation prefix)				
60	Standards of Performance for New Stationary Sources (NSPS)	Y	Information related to Liquefaction Plant applicability of Part 60 NSPS is provided in <i>Resource Report 9</i> Section 9.2.6.6, starting on page 9-93, and in RR9 Appendix H Project NSPS, NESHAPs and RMP Applicability Analysis, both included as Attachment 4 .	
63	National Emissions Standards for Hazardous Air Pollutants (NESHAPs)	Y	Information related to Liquefaction Plant applicability of Part 63 NESHAPs is provided in <i>Resource Report 9</i> , Section 9.2.6.7, starting on page 9-94, and in RR9 Appendix H Project NSPS, NESHAPs and RMP Applicability Analysis, both included as Attachment 4 .	See 18 AAC 50.316 discussion below for 63.5(d)(1)-(2) requirements. Please note that AK LNG has refined NESHAPs applicability analysis since RR9 was submitted to FERC in April 2017. The Project now believes requirements of 40 C.F.R. 63, subpart EEEE <u>do</u> apply to the Liquefaction Plant, while those of 40 C.F.R. 63, subpart HH <u>do not</u> apply to the Liquefaction Plant. This differs from Table 9.2.6-6 of Resource Report 9, which indicates applicability of these two subparts is "TBD" (to be determined). AK LNG provided the Department a revised version of Table 9.2.6-6 in response to response RFI-538-014 submitted in response to the Department's March 6, 2018 incompleteness finding for the GTP construction permit application.
68	Chemical Accident Prevention Provisions	Y	Information related to Liquefaction Plant applicability of Part 68 Chemical Accident Prevention Provisions is provided in <i>Resource Report 9</i> , Section 9.2.6.8, on page 9-95, and in RR9 Appendix H Project NSPS, NESHAPs and RMP Applicability Analysis, both included as	

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			Attachment 4..	
Other 40 CFR	Various	Varies	Applicability of other 40 CFR stationary source air quality requirements is provided in <i>Resource Report 9 (Attachment 4)</i> , Section 9.2.6, starting on page 9-85.	
Applicable Alaska Regulations (18 AAC regulatory citation prefix)				
50.306(c)(3)	PSD Permits- Issuance	n/a	n/a	Liquefaction Plant does not wish to have Title V Operating Permit integrated review, but rather would make application for an operating permit at a later date.
50.316 (a)	Review of HAP-Major source	Y	Section 7 of the <i>Project Information Form</i> provides summary classification of Liquefaction Plant regarding major stationary source status/applicability. Additional information related to Liquefaction Plant HAP "Potential to Emit" (PTE) is provided in <i>Resource Report 9 (Attachment 4)</i> , Section 9.2.5.1.1, starting on page 9-49. HAP emissions by emission unit are provided in <i>Appendix D to Resource Report 9 (Attachment 5)</i> , pdf page 191 (Appendix A to Appendix D).	18 AAC 50.316(a) is the process in the Alaska State Implementation Plan for meeting 40 CFR 63.5(d)(1)-(2) requirements related to application for approval of construction of a HAP-Major Source
Other 18 AAC	Various	varies	Applicability of other 18 AAC 50 stationary source air quality requirements is provided in <i>Resource Report 9 (Attachment 4)</i> , Section 9.2.6, starting on page 9-85.	
Applicable Alaska Statutes (no citation prefix)				
AS 46.14.520	Confidentiality of Trade Secrets	Y	Information requesting certain portions of this application be considered confidential information is provided in the Confidentiality of Records Application and Certification (Attachment 12) .	Information considered trade secret/confidential is included in attachment 12.