From:	Dave Jordan
To:	Jones, Dave F (DEC)
Cc:	Frederick Werth; Simpson, Aaron J (DEC); Ted Hartman (Ted.Hartman@nutrien.com)
Subject:	RE: Draft Preliminary Construction Permit AQ0083CPT07 for Agrium"s KNO Facility
Date:	Tuesday, May 19, 2020 1:02:28 PM
Attachments:	image001.png

Dave,

Thanks for the latest draft permit. We have a few minor comments that we believe should be made to address the issues we discussed.

- Condition 18.2d includes a sentence that reads "One test shall be completed during each of the three runs at maximum achievable load." In Condition 17.2d this language was changed to read "The test shall be completed at maximum achievable load." We believe that the language in Condition 18.2d should be changed to be consistent with the language in Condition 17.2d.
- Condition 18.2g contains a requirement to maintain a spare catalyst bed onsite. We believe that the language in Condition 18.2f regarding operation and maintenance procedures is intended to eliminate the need to maintain a spare catalyst bed onsite, and that Condition 18.2g should simply be eliminated.
- Condition 18.3e contains language related to NOx testing on the reformer that refers to test runs consisting of "four grab samples, with each sample taken at about 15-minute intervals". We believe that this language comes from a Subpart D test procedure that is no longer relevant. Our suggestion is to simply delete Condition 18.3e.

Let us know if you have any questions regarding any of these comments.

On a related note, we have completed the increment consumption modeling and will be providing a report to Jesse Jack for his review.

David Jordan, P.E.
Partner

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From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>

Sent: Wednesday, May 13, 2020 8:29 PM
To: Dave Jordan <Dave.Jordan@erm.com>; Ted Hartman (Ted.Hartman@nutrien.com) <Ted.Hartman@nutrien.com>
Cc: Frederick Werth <Frederick.Werth@nutrien.com>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>; Jack, Jesse R (DEC) <jesse.jack@alaska.gov>; Stacy, Andrea <Andrea_Stacy@nps.gov>; Collins, Catherine <Catherine_Collins@fws.gov>
Subject: Draft Preliminary Construction Permit AQ0083CPT07 for Agrium's KNO Facility

Dave and Ted,

The Alaska Department of Environmental Conservation (Department) has reviewed the Construction Permit Application AQ0083CPT07 for Agrium's Kenai Nitrogen Operations facility and is providing Nutrien with a copy of the draft permit and technical analysis report (TAR) to review for technical accuracy. This is not a comment period, so please keep the scope of your comments to typographical and grammatical errors and correctness/completeness issues.

Note that the modeling report section of the TAR is still blank. Please continue to work with Jesse Jack on an updated increment inventory analysis so that this section may be completed prior to the permit going out for comment.

Please review the permit and TAR and provide corrections to the Department by May 27, 2020, or let us know if you need additional time or if you have any questions.

Regards,

Dave Jones
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ADEC – Air Quality – Juneau
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