

Response to Comments on Preliminary General Permit A Yakutat Power Plant, Galena Electric Utility, Point Hope Power Plant, Wainwright Power Plant

Prepared by Aaron Simpson on December 17, 2021

This document provides the Alaska Department of Environmental Conservation's (Department's) reply to all public comments on the preliminary decision to issue General Permit A for the Yakutat Power Plant, Galena Electric Utility, Point Hope Power Plant, Wainwright Power Plant at various locations across the state. The Department provided opportunity for public comment from August 10, 2021 through September 9, 2021. HMH Consulting, LLC. was the only commenter.

All comments are provided verbatim, unless noted otherwise. The Department's responses are shown in *Times New Roman italic font*.

Commenter: HMH Consulting LLC.

Comments on the permit:

Suggested language to be included is **bold**. Suggested language to be removed is ~~strikeout~~.

Draft GPA

Comment 1: Table of Abbreviations and Acronyms, page iv of the permit

- Please add kW and kWh to the list.
- Should “tph” be capitalized?

Response: The Department included kW and kWh in the abbreviations and acronyms page. The Department did not capitalize “tpy” since it is consistent with past Department practice and is several federal requirements.

Comment 2: Section 1. Qualifying Requirements

- The Department refers to sulfur dioxide special protection areas under bullet #11 on this list. Isn't the Department repealing SO2 special protection areas from the regulations? Should this then be removed from the qualifying requirements in the permit?
- Under bullet #12, the Department refers to “fuel storage tanks subject to 40 C.F.R. 6...”. Should this be “40 C.F.R. 60?”
- Under bullet #13, the Department refers to “...any standard in 18 AAC 50.0555(a)-(f)...”. Should this be “18 AAC 50.055?”
- Under bullet #14 (first sub-bullet), the Department uses a period at the end of that sentence instead of a semicolon.
- There is no page number given on this page. It should be page v.

Response: The Department did not remove the bullet related to the SO₂ special protection area because it is still an applicable requirement in 18 AAC 50.

The Department revised the following bullets:

- *Bullet #12 to correct the typographical error.*
- *Bullet #13 to correct the typographical error.*
- *Bullet #14 to correct the grammatical error.*

The Department included the omitted page number (Page 1 of 74)

Comment 3: Pagination

- The Department starts with Section 2 on page 2 of the permit. Shouldn't it be page 1?

Response: The Department included the omitted page number in Section 1 (Page 1 of 73), therefore Section 2 correctly starts on page 2.

Comment 4: Grammatical correction to Condition 6

Please insert the following underlined text to correct the grammar of this sentence:

“The permittee shall conduct source tests on diesel engines to determine the concentration of particulate matter (PM) in the exhaust of an emissions unit in accordance with this Condition 6.”

Response: The Department revised Condition 6 to be consistent with the Department's Standard Permit Conditions IX and XI.

Comment 5: Unclear reference to a timeline in Condition 8.1(b); incorrect punctuation

In Condition 8.1(b) the Department states “if one of the criteria of Condition 6.2 was exceeded and the Permittee did not comply on time with either Condition 6.1 or 6.1.a. (sic) Report the deviation within 24 hours of the date compliance with Condition 6.1 was required.”

There does not appear to be a timeline set out in Condition 6, so it is unclear when one must report the deviation referred to here in Condition 8.1(b). Perhaps this is an incongruity that arises from the recent revision of the permit conditions, but it is material enough to matter for compliance purposes moving forward, as it would have a serious impact on a facility's ability to comply with its permit in good faith.

Also, the Department probably intended to use a comma, and not a period after “6.1.a.” As it is written, the both sentences in that condition are incomplete.

Response: The Department revised Conditions 6 through 11 for consistency with the Department's Standard Permit Conditions IX and XI. The Standard Permit Conditions have a set schedule for reporting permit deviations. This schedule includes taking corrective actions and repeating Method 9 visible emissions observations, or conducting a particulate matter source

test within six months of the Method 9 observation that exceeds an 18-minute average opacity greater than:

20 percent for an emissions unit with an exhaust stack diameter that is equal to or greater than 18 inches; or

15 percent for an emissions unit with an exhaust stack diameter that is less than 18 inches, unless the Department has waived this requirement in writing.

Conditions 7 and 8 contain the particulate matter recordkeeping and reporting requirements specifying reporting within 30 days of the end of the month for which the Method 9 observations occur, and excess emissions reporting if a particulate matter source test exceeds the State emissions standard, or if the Permittee does not comply with the 20 percent and 15 percent opacity thresholds listed in Conditions 6.2a and 6.2b.

Comment 6: Grammatical correction to Condition 10.3

Condition 10.3 refers to “0.75 wt%~~S~~fuel.” There should be a space before the word “fuel.”

Response: *The Department revised Condition 10.3 to correct the grammatical error.*

Comment 7: Corrections to Conditions 12 and 13

- The word “compliance” appears in Conditions 12.3 and 13.2. The correct spelling is “compliance.”
- There is an unclear statement in Condition 12.4 that can be corrected in one of two ways: “Account for the consumption of used oil blends ~~as~~ set out ~~in~~ according to Condition 15.2;” or “Account for the consumption of used oil blends ~~set out~~ according to Condition 15.2.”
- Semicolons are used improperly in Condition 12.5(b). The semicolons should be commas, consistent with the “listing” rule for semicolons (i.e.: semicolons can be used to make a long list more clear, such as “Eileen bought bread, mangoes, and salt; Joe bought carrots, celery, and chicken; Kris bought pine nuts, basil, and olive oil.”)

Response: *The Department revised Conditions 12.3 and 13.2 to correct the typographical errors and revised Condition 12.4 and 12.5b to correct the grammatical errors.*

[NO COMMENT 8 RECEIVED]

Comment 9: Corrections to Condition 15

- In Condition 15.2(b), the Department misspelled the word “fore.” It should be “for.”
- In Condition 15.4(a), the Department used a colon at the end of the sentence. Should this be a semicolon?
- In Condition 15.4(b), the statement might be clarified by rephrasing it as follows: “The source test shall be conducted within (SIC) 90 days after reaching the fuel trigger the amount listed in Condition 15.4.” Also, the Department misspelled the word “within.”
- In Condition 15.4(g), a semicolon is recommended, rather than a period.

- In Condition 15.4(h)(ii), we recommend rephrasing the sentence as follows: “Submit an analysis to show whether or not the fuel limit in Condition 15.1 ~~still limits~~ continues to limit the stationary source...”

Response: The Department revised the conditions identified above as follows:

- Condition 15.2b to correct the typographical error
- Conditions 15.4a, 15.4g, and 15.4h(ii) to correct the grammatical errors
- Condition 15.4b to reference the source testing requirement trigger in Condition 15.4

Comment 10: Correction to Condition 18

- The Department used a period at the end of the statement in Condition 18.5(a)(v), when a semicolon would be more appropriate given that the list of conditions continues under Condition 18.5(b).

Response: The Department did not revise Condition 18.5a(v) because it is an if/or statement. The notification requirements under Condition 18.5a(i)-(v) apply to non-emergency engines. If the stationary engines are emergency engines, the Permittee is not required to submit an initial notification.

Comment 11: Corrections to Condition 26

- “Condition 0” appears once in Condition 26.3 and twice in Condition 26.4. This reference should likely be Condition 26.1.

Response: The Department updated the cross-references in Condition 26 to correct the error references.

Comment 12: Section 13, Semiannual Operating Report Form

- The bulleted items under the heading of “NSPS Subpart III Requirements imply that these conditions apply universally to all engines, when in fact they apply narrowly as described in each condition. A rephrase would clarify any confusion that may result, as follows:
 - For any engine >3,000 hp or 10 liters/cylinder, documentation showing that each engine meets the emission standards under 21.6(c) or 21.6(d) that apply to it;
 - For engines equipped with a diesel particulate filter (dpf), records of corrective action taken after the backpressure monitor shows the engine is approaching its backpressure limit under Condition 21.2(a), if applicable;

Response: The Department revised Section 13 for clarity and consistency with the applicable requirements in Conditions 21.2 and 21.6.

Comment 13: Statement of Basis

- At the bottom of page 55, the sentence under Item 8 should end in a colon.

- Table A contains a footnote referring to CO₂e, but CO₂e emissions are not tabulated in the table itself. Likely Footnote 1 of Table A needs to be removed.

Response: The Department revised Table A to include the calculation for CO₂e emissions. Therefore Footnote 1 now correctly references the missing column.