

May 1, 2018

Ms. Elizabeth Nakanishi
Alaska Department of Environmental Conservation Air Permits Program
555 Cordova Street
Anchorage, Alaska 99501

Re: Construction Permit Application for the Alaska LNG Gas Liquefaction Facility

Dear Ms. Nakanishi-

The Alaska Gasline Development Corporation (AGDC) hereby submits of a construction permit application for the Alaska LNG Liquefaction Facility for the Department's consideration.

This application consists of the *ADEC Air Quality Construction Permit Application Project Information Form* and multiple attachments as described in Section 11 of the Project Information Form.

If you have any questions regarding this submittal, please contact Jim Pfeiffer at (281) 896-6754 or jpfeiffer@agdc.us.

Respectfully,



Frank T. Richards, P.E.
Senior Vice President, Program Management

Enclosure(s):

ADEC Project Information Form for GTP

Additional attachments as described in the Project Information Form

Cc: Patrick Dunn, ADEC
Aaron Simpson, ADEC
Alan Schuler, ADEC
Jim Pfeiffer, AGDC

Alaska Department of Environmental Conservation
AIR QUALITY CONSTRUCTION PERMIT APPLICATION
Project Information Form



Section 1 Stationary Source Information

Stationary Source Name: Liquefaction Plant		SIC: 4924	
Project Name (if different): Alaska LNG		Stationary Source Contact: Frank T. Richards	
Source Physical Address: Nikiski, Alaska		City: Anchorage	State: AK
		Zip: 99503	
		Telephone: (907) 330-6352	
UTM Coordinates (m) or Latitude/Longitude:		E-Mail Address: FRichards@agdc.us	
		Northing:	Easting:
		Latitude: 60.6655	Longitude: 151.3593

Section 2 Legal Owner

Name: Alaska Gasline Development Corporation		
Mailing Address: 3201 C Street, Suite 200		
City: Anchorage	State: AK	Zip: 99503
Telephone: 907-330-6300		
E-Mail Address:		

Section 3 Operator (if different from owner)

Name: Same as Owner		
Mailing Address:		
City:	State:	Zip:
Telephone:		
E-Mail Address:		

Section 4 Designated Agent (for service of process)

Name: N/A		
Mailing Address:		
City:	State:	Zip:
Physical Address:		
City:	State:	Zip:
Telephone :		
E-Mail Address:		

Section 5 Billing Contact Person (if different from owner)

Name: Olena Bruselas		
Mailing Address: 3201 C Street		
City: Anchorage	State: AK	Zip: 99503
Telephone: (907) 330-6362		
E-Mail Address: accounting@agdc.us		

Section 6 Application Contact

Name: Kalb Stevenson			
Mailing Address: 3201 C Street, Suite 200		City: Anchorage	State: AK
		Zip: 99503	
Telephone: (907) 330-6359			
E-Mail Address: KStevenson@agdc.us			

Section 7 Major Permit Classification(s)

(Check all that apply)

- 18 AAC 50.306
- 18 AAC 50.311
- 18 AAC 50.316

Section 8 Minor Permit Classification(s)

(Check all that apply)

- 18 AAC 50.502(b)(1)
- 18 AAC 50.502(b)(2)
- 18 AAC 50.502(b)(3)
- 18 AAC 50.502(b)(4)
- 18 AAC 50.502(b)(5)
- 18 AAC 50.502(b)(6)
- 18 AAC 50.502(c)(2)(A)
- 18 AAC 50.502(c)(2)(B)
- 18 AAC 50.502(c)(3)
- 18 AAC 50.508(3)
- 18 AAC 50.508(5)
- 18 AAC 50.508(6)

PROJECT IDENTIFICATION FORM

Section 9 Project Description

Provide/attach a short narrative describing the project. Discuss the purpose for conducting this project, what emission units/activities will be added/modified under this project (i.e., project scope), and the project timeline. If the project is a modification to an existing stationary source, describe how this project will affect the existing process. Include any other discussion that may assist the Department in understanding your project or processing your application. Include a schedule of construction and the desired date for permit issuance.

If this application includes an Owner Requested Limit or a request to revise an existing permit term or condition, describe the intent of the limit, and provide sample language for the limit, and for monitoring, record keeping, and reporting for showing compliance with the limit.

Add additional pages if necessary.

Please see Attachment 1, Construction Permit Application Information Reference Table for Alaska LNG Liquefaction Plant, for the location of additional project description information.

A listing of emissions units to be added at the Liquefaction Plant under this project is provided in the following table:

EUID	Source Description	Fuel Type/ Product	Nominal Capacity	Pilot/ Purge Capacity	Capacity Units
1-6	Compression Turbines- Trains 1 thru 3 (each train 2x50%)	Fuel Gas	114,000		kW (@ 40° F)
7-10	Power Generation Turbines- 1 thru 4	Fuel Gas	40,000		kW (@ 40° F)
11	Emergency Firewater Pump RICE	ULSD	430		kW
12	Auxiliary Air Compressor RICE	ULSD	220		kW
13	Thermal Oxidizer	Fuel Gas/ Process Gas	6.0		MMBTU/ hr
14- 15	Dry/Wet Ground Flares #1 (3x50%)	Fuel Gas@ pilot/purge, process gas to nominal capacity	68,000		8.5
16- 17	Dry/Wet Ground Flares #2 (3x50%)		68,000	8.5	mscfh
18- 19	Dry/Wet Ground Flares #3 (3x50%)		68,000	8.5	mscfh
20	Elevated Low Pressure Flare		990	19.0	mscfh
21	Gas Condensate Storage Tank	Stabilized NGLs	475,890		gallons
22	Off-Spec Gas Condensate Storage Tank	Stabilized NGLs	126,904		gallons
23	Gas Condensate Loading System	Stabilized NGLs	1,000		bbl/day
24	Diesel Storage Tank	ULSD	3,520		gallons
25	Air Compressor Diesel Day Tank	ULSD	342		gallons
26	Firewater Pump Diesel Day Tank	ULSD	342		gallons

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), and would exceed the §52.21(b)(23) significant emissions rates for carbon monoxide, nitrogen oxides, sulfur dioxide, particulate matter, PM₁₀, PM_{2.5} and ozone precursors.

The Plant is not believed to trigger any minor permit classifications listed in Section 8 of this form.

PROJECT IDENTIFICATION FORM

Section 10 Certification

This certification applies to the Air Quality Control Construction Permit Application for the **Alaska LNG Liquefaction Plant** submitted to the Department on: _____ (Stationary Source Name)

Type of Application

- Initial Application
- Change to Initial Application

The application is **NOT** complete unless the certification of truth, accuracy, and completeness on this form bears the **signature of a responsible official** of the firm making the application. (18 AAC 50.205)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

“Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.”

Signature: 	Date: 4/26/18
Printed Name: Frank T. Richards	Title: Senior Vice President, Program Management

Section 11 Attachments

Attachments Included. List attachments:

On April 17, 2017, the Alaska LNG Project (Project) filed a Natural Gas Act Section 3 Application with the Federal Energy Regulatory Commission (FERC). The Section 3 Application contains a series of Resource Reports, several of which provide detailed information relevant for the Liquefaction Facility Construction Permit application. Relevant FERC Resource Reports (and associated appendices) are included as attachments below. More specific references to Resource Reports/appendices by construction permit regulatory requirement are provided in Attachment 1.

Attachment #	Name of Attachment
1	Construction Permit Application Information Reference Table for Alaska LNG Liquefaction Plant
2	Alaska LNG Resource Report 1 (General Project Information)
3	ADEC Modeling Protocol Approval Letter and Alaska LNG Response to Comments
4	Alaska LNG Resource Report 9 (RR9, Air and Noise Quality) and Appendix H to RR9 (Project NSPS, NESHAPS and RMP Applicability Analysis)
5	Appendix D to Alaska LNG Resource Report 9 (Liquefaction Facility Air Quality Modeling Report)
6	Liquefaction Plant Best Available Control Technology (BACT) Analysis
7	Liquefaction Plant Air Quality Modeling Files (provided only in electronic format)
8	AERMOD Sensitivity Liquefaction Plant
9	Liquefaction Pre-Construction Monitoring
10	Liquefaction Plant Additional Impacts Analysis
11	Liquefaction Plant Sources Impacting Class I Areas Additional Requirements
12	Confidentiality of Records Application and Certification

PROJECT IDENTIFICATION FORM

Section 12 **Mailing Address**

Submit the construction permit application to the Permit Intake Clerk in the Department's Anchorage office. Submitting to a different office will delay processing. The mailing address and phone number for the Anchorage office is:

Permit Intake Clerk
Alaska Department of Environmental
Conservation Air Permit Program
619 E. Ship Creek, Suite 249
Anchorage, Alaska 99501
(907) 269-6881