

STATE OF ALASKA

DEPT. OF ENVIRONMENTAL CONSERVATION DIVISION OF AIR QUALITY AIR PERMITS PROGRAM

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March 23, 2010

Subject: Waste Heat Recovery and Air Permitting Obligations

Dear Permittee,

The Department has been receiving questions from rural electric air quality control permit holders as to whether the installation of waste heat recovery (WHR) on combustion units requires a permit modification. The Department is therefore issuing the following response since the desire to use WHR is likely widespread.

The installation of WHR can increase ground-level pollution levels due to the reduced buoyancy of the exhaust plume. Therefore, the Department is asking permit holders to contact the Air Permit Program (APP) prior to installing a WHR project. The Department will then review the notification and any previous air quality assessments to determine whether the permittee should submit a new/revised air quality demonstration under 18 AAC 50.201(a). The demonstration may or may not lead to revised permit conditions, as noted under 18 AAC 50.210(b).

Permit holders should send their WHR notifications to Alan Schuler at ADEC Air Permits Program; 410 Willoughby Avenue, Suite 303; PO Box 111800; Juneau, AK 99811-1800 or via e-mail to alan.schuler@alaska.gov. Permit holders need not provide a notification for a WHR project already authorized through an air quality control permit. The notifications should include the following information:

- Stationary source name, location and permit number
- Contact name and phone number
- A listing of the emission units that are being considered for WHR
- The permit number (or approximate time-frame) associated with the most recent air quality demonstration (if applicable)

The Department has informed its permit inspectors to be aware of the potential use of WHR during their site visits. While most permits do *not* prohibit the installation of WHR, a subsequent adverse air quality finding may lead to a revised WHR/stack design or other permit conditions. The Department is therefore encouraging permit holders to provide the notifications prior to installation so that any air quality concerns can be addressed as part of the initial WHR design.

Questions regarding this letter should be addressed to me at alan.schuler@alaska.gov or (907) 465-5112.

Sincerely,



Alan E. Schuler, P.E.
Environmental Engineer

cc: Debra Dalcher, ADEC/APP, Anchorage
Jim Baumgartner, ADEC/APP, Juneau
P. Moses Coss, ADEC/APP, Fairbanks
John Kuterbach, ADEC/APP, Juneau
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