

Submitted via Electronic Mail – Delivery Receipt Requested

January 28, 2022

Title V Permit Program Intake Clerk
c/o Yesenia Camarena via email: yesenia.camarena@alaska.gov
Alaska Department of Environmental Conservation
Air Permits Program
555 Cordova Street, Anchorage, 99501

Subject: Amendment to November 19, 2021, Minor Permit Application for Alaska Village Electric Cooperative's Bethel Power Plant

Dear Sir or Madam:

Alaska Village Electric Cooperative (AVEC) is submitting this letter and attachment as Amendment #2 to the minor source permit application originally submitted on November 19, 2021. The November application requested a permit authorizing AVEC to install a new diesel fired generator set (Emission Unit 8; EU 8) and to establish several Owner Requested Limits applicable to the proposed EU 8 and the existing Emission Unit #1.

The purpose of this amendment is to request that the Department develop and process the minor source permit under the provisions of 18 AAC 50.542(e) such that the terms and conditions of the final minor permit will qualify to be administratively added to the existing Title V permit AQ0205TVP04.

AVEC is seeking this action because the terms and conditions requested in the minor source permit application will conflict with some of the terms and conditions of the existing Title V permit. AVEC desires to resolve those potential conflicts so that it will have an unquestionable basis to proceed forward with the design, procurement, installation, and eventual operation of the proposed new EMD engine (EU 8) and a replacement black-start engine (EU 7a) upon execution of the administrative amendment to the Title V permit.

We understand that by using the provisions of Sections 542(e) and 326(c)(2) of 18 AAC 50, the Department will be able to issue an Administrative Amendment to AQ0205TVP04 within a short time following the issuance of the minor source permit. Furthermore, we would much appreciate the Department making a request to EPA for an expedited review of the Title V permit amendment.

We recognize that the existing Title V permit is due to expire May 5 of this year. On November 1, 2021, AVEC submitted an application to renew the Bethel Power Plant's current Title V Operating Permit AQ0205TVP04. Yet, because issuance of the minor permit for EU 8 and avoiding the potential for conflicting terms between the two permits is of the utmost importance to AVEC's future development of the Bethel Power Plant, we are also requesting that the 5-year renewal of the Title V permit follow, rather than supersede the administrative amendment to the existing Title V permit.

To support this permit application amendment under 18 AAC 50.542(e), we are submitting information in the Department's Stationary Source ID form (attached) for the proposed EU 8 and the replacement EU 7a. This form is a copy of the form submitted coincident with the November 19, 2021, permit application and refers to information contained elsewhere in that permit application.

AVEC greatly appreciates the Department's support and guidance for a timely execution of the minor source permit and the administrative amendment to the Title V permit. If any additional information is necessary to support the actions requested above, please contact Darren Westby at 907-565-5337 or email: dwestby@avec.org

Sincerely,




Dan Allis
Operations Manager

Attachments:

Stationary Source Identification Form

cc: Bill Stamm, AVEC
Darren Westby, AVEC
Lenny Welch, AVEC
Jim Plosay, Air Permits Program Manager, ADEC, Juneau via email:
Jim.plosay@alaska.gov
Grace Germain, ADEC, via email: grace.germain@alaska.gov
Jesse Jack, ADEC, via email: jesse.jack@alaska.gov
Aaron Simpson, ADEC, via email: aaron.simpson@alaska.gov
Tom Chapple, HMH Consulting, LLC via email: tom@hmhconsulting.org

ATTACHMENT
Stationary Source ID Form for AVEC Bethel Power Plant

Alaska Department of Environmental Conservation Air Quality Minor Permit Application	
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STATIONARY SOURCE IDENTIFICATION FORM

Section 1 Stationary Source Information

Name: Alaska Village Electric Cooperative – Bethel Power Plant			SIC: 4911
Project Name (if different):	Contact: Lenny Welch		
Physical Address: 1340 Kwethluk Lane	City: Bethel	State: AK	Zip: 99559
	Telephone: 907-543-2949		
	E-Mail Address: lwelch@avec.org		
UTM Coordinates (m) or Latitude/Longitude:	Northing:	Easting:	Zone:
	Latitude: 60.79222°N	Longitude: 161.75583°W	

Alaska Department of Environmental Conservation
Air Quality Minor Permit Application



Section 2 Legal Owner			Section 3 Operator (if different from owner)		
Name: Alaska Village Electric Cooperative			Name:		
Mailing Address: 4831 Eagle Street			Mailing Address:		
City: Anchorage	State: AK	Zip: 99503	City:	State:	Zip:
Telephone #: 907-561-1818			Telephone #:		
E-Mail Address:			E-Mail Address:		

Section 4 Designated Agent (for service of process)			Section 5 Billing Contact Person (if different from owner)		
Dan Allis, Operations Manager			Name: Kirstin Enanoria, Operations Coordinator		
Mailing Address: 4831 Eagle Street			Mailing Address: 4831 Eagle Street		
City: Anchorage	State: AK	Zip: 99503	City: Anchorage	State: AK	Zip: 99503
Telephone #: 907-565-5320			Telephone #: 907-563-5790		
E-Mail Address: dallis@avec.org			E-Mail Address: kenanoria@avec.org		

Section 6 Application Contact			
Name: Darren Westby, Engineering Manager			
Mailing Address: 4831 Eagle Street		City: Anchorage	State: AK
		Telephone #: 907-565-5337	Zip: 99503
E-Mail Address: dwestby@avec.org			

Section 7 Desired Process Method (Check only one – see 18 AAC 50.542(a) for process descriptions and restrictions)

- Fast track for a permit classification under 18 AAC 50.502 [18 AAC 50.542(b)]
 Public comment [18 AAC 50.542(d)]

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STATIONARY SOURCE IDENTIFICATION FORM

Section 8 Source Classification(s) (Check all that apply)

[18 AAC 50.502(b)]

- Asphalt Plant [≥ 5 ton per hour]
- Thermal Soil Remediation Unit [≥ 5 ton per hour]
- Rock Crusher [≥ 5 ton per hour]
- Incinerator(s) [total rated capacity ≥ 1000 lb/hour]
- Coal Preparation Plant
- Port of Anchorage Facility

If you checked any of the above, is (are) the emission unit(s) new, relocated*, or existing?

[18 AAC 50.502(c),1]

New or relocated* stationary source with potential emissions greater than:

- 40 tons per year (tpy) NOx
- 40 tpy SO₂
- 15 tpy PM-10
- 10 tpy PM-2.5
- 0.6 tpy lead
- 100 tpy CO in a nonattainment area

[18 AAC 50.502(c),2]

Construction or relocation* of a:

- Portable oil and gas operation
- ≥ 10 MMBtu/hr fuel burning equipment in a SO₂ special protection area

* Relocation does NOT include moving equipment from one place to another within your current stationary source boundary.

Section 9 Modification Classification(s) (Check all that apply)

[18 AAC 50.502(c),3]

- NOx Increase > 10 tpy [and existing PTE > 40 tpy]
- SO₂ Increase > 10 tpy [and existing PTE > 40 tpy]
- PM-10 Increase > 10 tpy [and existing PTE > 15 tpy]
- PM-2.5 Increase > 10 tpy [and existing PTE > 10 tpy]
- CO Increase > 100 tpy [and existing PTE > 100 tpy in a nonattainment area]

[18 AAC 50.502(c),4]

- NOx Increase > 40 tpy [and existing PTE ≤ 40 tpy]
- SO₂ Increase > 40 tpy [and existing PTE ≤ 40 tpy]
- PM-10 Increase > 15 tpy [and existing PTE ≤ 15 tpy]
- PM-2.5 Increase > 10 tpy [and existing PTE ≤ 10 tpy]
- CO Increase > 100 tpy [and Existing PTE ≤ 100 tpy in a nonattainment area]

Basis for calculating modification:

- Projected actual emissions minus baseline actual emissions
- New potential emissions minus existing potential emissions

Section 10 Permit Action Request (Check all that apply)

[18 AAC 50.506]

- Establish Plant-wide Applicability Limitation (PAL)
- Establish emission reductions to offset nonattainment pollutant
- Owner Requested Limit* (ORL)
- Revise or Rescind Title I Permit Conditions*
 Permit Number: 9524-AA001 Condition No. 4
 Date: April 5, 1995

* Which to use? See <http://www.dec.state.ak.us/air/ap/docs/orlrc.pdf>

Section 11 Existing Permits and Limits

For an existing stationary source, do you have an existing:
 (Check all that apply)

- Air quality permit Number(s)*: AQO205TV P04
 PTO 9524-AA001

- Owner Requested Limit(s) Permit Number(s):
- Pre-Approved Emission Limit (PAEL) Number(s)**:

* All active construction, Title V, and minor permit numbers.

**Optional. Please provide this number if possible.

<http://dec.alaska.gov/Applications/Air/airtoolsweb/>

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Stationary Source ID Form for AVEC Bethel Power Plant

STATIONARY SOURCE IDENTIFICATION FORM

Section 12 Project Description

Provide 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.

Please use additional copies of this sheet if necessary.

See Introduction section of the permit application.

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STATIONARY SOURCE IDENTIFICATION FORM

Section 12 Project Description Continued

For ORLs under Section 10 of this application [18 AAC 50.540(j)], include:

A description of each proposed limit, including for each air pollutant a calculation of the effect the limit will have on the stationary source's potential to emit and the allowable emissions [18 AAC 50.225(b)(4)]:

See Section 4.0 of permit application for all ORL application requirements.

A description of a verifiable method to attain and maintain each limit, including monitoring and recordkeeping requirements [18 AAC 50.225(b)(5)]:

See Sections 4 and 5 of permit application for all ORL application requirements.

Citation to each requirement that the person seeks to avoid, including an explanation of why the requirement would apply in the absence of the limit and how the limit allows the person to avoid the requirement [18 AAC 50.225(b)(6)]:

See Section 4.0 of permit application for all ORL application requirements.

A statement that the owner or operator of the stationary source will be able to comply with each limit [18 AAC 50.225(b)(8)]:

See Section 4.0 of permit application for all ORL application requirements.

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Section 12 Project Description Continued

For revising or rescinding Title I permit conditions under Section 10 of this application [18 AAC 50.540(k)], include:

An explanation of why the permit term or condition should be revised or rescinded [18 AAC 50.540(k)(2)]:

See Section 3 of the permit application. AVEC is not requesting to change the underlying pollutant limits of permit 9524-AA001, just a change in the monitoring, record keeping and reporting for demonstrating compliance with the facility wide NOx limit.

The effect of revising or revoking the permit term or condition on [18 AAC 50.540(k)(3)]:

- Emissions;
No change in emission limits is requested.

- Other permit terms;
none

- The underlying ambient demonstration, if any;
N/A

- Compliance monitoring; and
See Section 5 of the permit application which sets out draft changes to the MR&R requirements.

For revising a condition that allows avoidance of a permit classification, the information required for that type of permit, unless the revised condition would also allow the owner or operator to avoid the classification. [18 AAC 50.540(k)(4)]

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Section 13 Other Application Material

The information listed below must be included in your air quality control minor permit application. *Note: These must be attached in order for your application to be complete.*

If required to submit an analysis of ambient air quality under 18 AAC 50.540(c)(2), or if otherwise requested by the Department:

- Attached are maps, plans, and/or aerial photographs as necessary to show the locations and distances of
 - emissions units, buildings, emitting activities and boundaries of the associated with the stationary source, and
 - nearby or adjacent residences, roads, other occupied structures and general topography within 15 kilometers.(Indicate compass direction and scale on each.)
- Attached is a document (e.g., spreadsheet) showing coordinates and elevations of each modeled unit, along with parameters necessary to characterize each unit for dispersion modeling.
- Attached is an electronic copy of all modeling files.

Section 14 Certification

This certification applies to the Air Quality Control Minor Permit Application for the AVEC Bethel Power 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**. Responsible Official is defined in 18 AAC 50.990. (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: 11-19-21
Printed Name: DANIEL ALLIS	Title: OPERATIONS MANAGER

Section 15 Attachments

- Attachments Included. List attachments: _____

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STATIONARY SOURCE IDENTIFICATION FORM

Section 16 Mailing Address

Submit the minor 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
555 Cordova Street
Anchorage, Alaska 99501
(907) 269-6881