FORM A1-R

Stationary Source Supplemental Information or Application Revision

Permit Number: AQ0417TVP03

Permit Contact:	Name	Lynette Peluso
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Brief Description of Supplemental Information or Application Revision:

Through discussions between Savant Alaska, LLC, U.S. Environmental Protection Agency (EPA), and the Alaska Department of Environmental Conservation (ADEC) on April 19, 2023, a determination was made regarding ongoing performance source testing for core engine replacements for turbines affected under 40 Code of Federal Regulations (CFR) 60 subpart GG. That determination allows the Permittee to continue ongoing performance testing according to an existing schedule for Emissions Unit ID 500 or 501 when an identical core engine replacement occurs for a turbine where a modification or reconstruction, as those terms are defined in 40 CFR 60 subpart A, does not occur. Therefore, Savant Alaska, LLC requests that the application be updated to include a revision to Form B2 for EU IDs 500 and 501 to include the proposed related requirements.

Statement of Certification:

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.

DAVID PASCAL

Name of Responsible Official

COO, GLACIER OIL & GAS CORP.

Title

Signature (blue ink)

7/20/23

Date

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0417TVP03

1.	Emission Unit ID Number // Operating Scenario	Emission Unit 500
2.	Date installation/construction commenced[1]	1998
3.	Date installed	1998
4.	Emission Unit serial number	0456M
5.	Special control requirements? [if yes, describe]	Dry low NO_X combustion technology ($SoLoNO_X$) (Condition 17.1.a(ii))
6.	Manufacturer and model number	Solar Mars 90
7.	Type of combustion device	Turbine
8.	Rated design capacity (horsepower rating for engines)	
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	127 MMBtu/hr
10.	If used for power generation, electrical output (kW)	11,862 kW

1. See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
- NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
- NSPS Subparts GG and KKKK, and NESHAP Subpart YYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
Fuel Gas	Approximately 122 Mscf/hr

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: None

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 1	18 AAC 50.055(a)(1)	Visible Emissions	Do not cause or allow visible emissions to reduce visibility by more than 20 percent averaged over any six consecutive minutes.	Yes	Standard Permit Condition VIII
AQ0417TVP03 – Condition 6	18 AAC 50.055(b)(1)	Particulate Matter (PM) Emissions	Do not cause or allow particulate matter to exceed 0.05 grains per cubic foot of exhaust gas averaged over three hours.	Yes	Standard Permit Condition VIII
AQ0417TVP03 – Condition 10	18 AAC 50.055(c)	Sulfur Compound Emissions	Do not cause or allow sulfur compound emissions to exceed 500 ppm averaged over three hours.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8.
AQ0417TVP03 – Condition 13	AQ0417MSS05 – Condition 8	Limit to Protect SO_2 Ambient Air Quality Standard	Operate using fuel gas with an H_2S content not to exceed 250 ppmv.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8.
AQ0417TVP03 – Condition 17.1.a(ii)	AQ0417MSS05 – Condition 12.1.a(i)(A)	NO_X Best Available Control Technology Limits	Install and operate dry low NO_X combustion technology ($SoLoNO_X$).	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 17.1.b(i)	AQ0417MSS05 – Condition 12.1.a(ii)(A)	NO_X Best Available Control Technology Limits	NO_X emissions shall not exceed 28.4 lb/hr for operation under all conditions and shall not exceed 85 ppmv corrected to 15 percent oxygen in $SoLoNO_X$ mode and at ambient temperatures above 0ºF.	Yes	Monitor, record, and report in accordance with Condition 18.1.

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 17.2.a(i)	AQ0417MSS06 – Condition 2.1.a	CO Best Available Control Technology Limits	CO emissions shall not exceed 50 ppmv corrected to 15 percent oxygen when operating at 100 percent load in $SoLoNO_X$ mode and at ambient temperatures above 0ºF, 14 lb/hr when operating in $SoLoNO_X$ mode and at ambient temperatures above 0ºF, and 385 lb/hr for operation under all other conditions.	Yes	Monitor, record, and report in accordance with Conditions 18.1.a, 18.2, and 18.5.
AQ0417TVP03 – Condition 17.2.b	AQ0417MSS05 – Condition 12.1.c	CO Best Available Control Technology Limits	Limit CO emissions from EU IDs 500 and 501, combined, to no greater than 336 tons per 12 consecutive-month period.	Yes	Monitor, record, and report in accordance with Condition 18.1.a, 18.2, and 18.5.
AQ0417TVP03 – Condition 17.3.a(i)	AQ0417MSS05 – Condition 12.1.d(i)	SO_2 Best Available Control Technology Limits	H_2S content of fuel gas shall not exceed 250 ppmv.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8, 18.3, and 18.5.
AQ0417TVP03 – Condition 17.4	AQ0417MSS05 – Condition 12.1.e	VOC Best Available Control Technology Limits	VOC BACT for fuel burning equipment is no controls with good operation practices. No emission limits are imposed as representing BACT.	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 17.5a(iii)	AQ0417MSS05 – Condition 12.1.f	PM_{10} Best Available Control Technology Limits	Visible emissions shall not exceed 10 percent opacity averaged over any six consecutive minutes.	Yes	Standard Permit Condition VIII Monitor, record, and report in accordance with Conditions 1.3 and 18.5.

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Conditions 19 and 20	AQ0417MSS05 – Conditions 13 and 14	Limits on Use of Load Banks Load Bank Exception	Except as provided below, after February 1, 2013, do not use load banks, water brakes, pump flow controls or other loads that have the single purpose to destroy energy in order to improve the CO emission performance of EU IDs 500 and 501. For purposes of this permit, a load bank is a resistance device that performs no process or space heating function. A load bank may be used on a short-term basis to address intermittent power fluctuations that may occur as a result of bringing on a second turbine for project ramp-up, with the plan of operating both turbines simultaneously.	Yes	Monitor, record, and report in accordance with Condition 20.1 through 20.3.
AQ0417TVP03 – Condition 23	40 CFR 60.7(b)	NSPS Subpart A Startup, Shutdown, and Malfunction Requirements	Maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the emission unit and malfunctions of associated air-pollution control equipment.	Yes	Record Review
AQ0417TVP03 – Condition 24	40 CFR 60.7(c)	NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report	Submit Excess Emission and Monitoring Systems Performance Report (EEMSP) as specified in this Condition.	Yes	Record Review
AQ0417TVP03 – Condition 25	40 CFR 60.7(d)	NSPS Subpart A Summary Report Form	Submit to ADEC and EPA semiannually a summary report form or EEMSP as specified in this Condition.	Yes	Record Review

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 26	40 CFR 60.8	NSPS Subpart A Performance (Source) Tests	Conduct performance tests according to 40 CFR 60.8 and Section 6 of the TV Permit at such other times as may be required by EPA and provide the ADEC and EPA with a written report of the results.	Yes	Record Review
AQ0417TVP03 – Condition 27	40 CFR 60.11(d)	NSPS Subpart A Good Air Pollution Control Practice	At all time, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the emission unit including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.	Yes	Reasonable Inquiry / Record Review
AQ0417TVP03 – Condition 28	40 CFR 60.11(g)	NSPS Subpart A Credible Evidence	For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of the standards set forth in Conditions 31 and 32 nothing in 40 CFR Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU ID 500 would have been in compliance with applicable requirements of 40 CFR Part 60 if the appropriate performance or compliance test or procedure had been performed.	N/A	Information condition only

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 29	40 CFR 60.12	NSPS Subpart A Concealment of Emissions	The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 31	40 CFR 60.332(a)(2) & (d)	NSPS Subpart GG NO_X Standard	Do not allow the exhaust gas concentration of NO_X to exceed 191 ppmvd at 15 percent O_2, ISO, dry exhaust basis.	Yes	Monitor, record, and report according to Conditions 32.2 through 32.4.
AQ0417TVP02, Rev 2 – Condition 33	40 CFR 60.333(b)	NSPS Subpart GG SO_2 Standard	Do not allow the sulfur content for the fuel burned in EU to exceed 0.8 percent by weight.	Yes	Monitor, record, and report according to Condition 34.
New Condition	18 AAC 50.326(j)(4)	NSPS Subpart GG Turbine Engine Replacement	See Attachment B-1.	Yes	See Attachment B-1.

[1] Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Non-applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request*):

Non-Applicable Requirements[1]	Reason for non-applicability and citation/basis
40 CFR 60.7(a)(1) & (3), 60.8(a)	Obsolete requirements. Initial notification and performance testing completed.
40 CFR 60.7(a)(4)	This requirement only applies to "existing facilities," as defined in 40 CFR 60.2.
40 CFR 60.332(a)(1)	Emission unit is not an Electric Utility Stationary Gas Turbine as defined in 40 CFR 60 Subpart GG.
40 CFR 60.334(a), (b), & (d), and 60.335(b)(4)	Emission unit is not equipped with water injection to control emissions of NO_X.
40 CFR 60.334(e) & (f)	Emission unit commenced construction prior to July 8, 2004.
40 CFR 60.334(g)	Emission unit is not subject to continuous monitoring requirements in 40 CFR 60.334(a), (d), or (f).
40 CFR 60.334(h)(2)	The allowance for fuel bound nitrogen to calculate the NO_X emission limit under 40 CFR 60.332 has not been claimed.
40 CFR 60 Subpart KKKK	Emission unit has not commenced construction, modification, or reconstruction after February 18, 2005.
40 CFR 63 Subpart YYYY	The affected facility is not a major source of hazardous air pollutants (HAPs).

[1] Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0417TVP03

1.	Emission Unit ID Number // Operating Scenario	Emission Unit 501
2.	Date installation/construction commenced[1]	1998
3.	Date installed	1998
4.	Emission Unit serial number	0455M
5.	Special control requirements? [if yes, describe]	Dry low NO_X combustion technology ($SoLoNO_X$) (Condition 17.1.a(i))
6.	Manufacturer and model number	Solar Mars 90
7.	Type of combustion device	Turbine
8.	Rated design capacity (horsepower rating for engines)	
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	127 MMBtu/hr
10.	If used for power generation, electrical output (kW)	11,862 kW

1. See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
- NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
- NSPS Subparts GG and KKKK, and NESHAP Subpart YYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
Fuel Gas	Approximately 122 Mscf/hr

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: None

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 1	18 AAC 50.055(a)(1)	Visible Emissions	Do not cause or allow visible emissions to reduce visibility by more than 20 percent averaged over any six consecutive minutes.	Yes	Standard Permit Condition VIII
AQ0417TVP03 – Condition 6	18 AAC 50.055(b)(1)	Particulate Matter (PM) Emissions	Do not cause or allow particulate matter to exceed 0.05 grains per cubic foot of exhaust gas averaged over three hours.	Yes	Standard Permit Condition VIII
AQ0417TVP03 – Condition 10	18 AAC 50.055(c)	Sulfur Compound Emissions	Do not cause or allow sulfur compound emissions to exceed 500 ppm averaged over three hours.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8.
AQ0417TVP03 – Condition 13	AQ0417MSS05 Condition 8	Limit to Protect SO_2 Ambient Air Quality Standard	Operate using fuel gas with an H_2S content not to exceed 250 ppmv.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8.
AQ0417TVP03 – Condition 17.1.a(ii)	AQ0417MSS05 Condition 12.1.a(i)(A)	NO_X Best Available Control Technology Limits	Install and operate dry low NO_X combustion technology ($SoLoNO_X$).	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 17.1.b(i)	AQ0417MSS05 Condition 12.1.a(ii)(A)	NO_X Best Available Control Technology Limits	NO_X emissions shall not exceed 28.4 lb/hr for operation under all conditions and shall not exceed 85 ppmv corrected to 15 percent oxygen in $SoLoNO_X$ mode and at ambient temperatures above 0ºF.	Yes	Monitor, record, and report in accordance with Conditions 18.1.

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 17.2.a(i)	AQ0417MSS06 – Condition 2.1.a	CO Best Available Control Technology Limits	CO emissions shall not exceed 50 ppmv corrected to 15 percent oxygen when operating at 100 percent load in $SoLoNO_X$ mode and at ambient temperatures above 0ºF, 14 lb/hr when operating in $SoLoNO_X$ mode and at ambient temperatures above 0ºF, and 385 lb/hr for operation under all other conditions.	Yes	Monitor, record, and report in accordance with Conditions 18.1.a, 18.2, and 18.5.
AQ0417TVP03 – Condition 17.2.b	AQ0417MSS05 – Condition 12.1.c	CO Best Available Control Technology Limits	Limit CO emissions from EU IDs 500 and 501, combined, to no greater than 336 tons per 12 consecutive-month period.	Yes	Monitor, record, and report in accordance with Condition 18.1.a, 18.2, and 18.5.
AQ0417TVP03 – Condition 17.3.a(i)	AQ0417MSS05 – Condition 12.1.d(i)	SO_2 Best Available Control Technology Limits	H_2S content of fuel gas shall not exceed 250 ppmv.	Yes	Monitor, record, and report in accordance with Conditions 10.5 through 10.8, 18.3, and 18.5.
AQ0417TVP03 – Condition 17.4	AQ0417MSS05 – Condition 12.1.e	VOC Best Available Control Technology Limits	VOC BACT for fuel burning equipment is no controls with good operation practices. No emission limits are imposed as representing BACT.	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 17.5a(iii)	AQ0417MSS05 – Condition 12.1.f	PM_{10} Best Available Control Technology Limits	Visible emissions shall not exceed 10 percent opacity averaged over any six consecutive minutes.	Yes	Standard Permit Condition VIII Monitor, record, and report in accordance with Conditions 1.3 and 18.5.

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Conditions 19 and 20	AQ0417MSS05 – Conditions 13 and 14	Limits on Use of Load Banks Load Bank Exception	Except as provided below, after February 1, 2013, do not use load banks, water brakes, pump flow controls or other loads that have the single purpose to destroy energy in order to improve the CO emission performance of EU IDs 500 and 501. For purposes of this permit, a load bank is a resistance device that performs no process or space heating function. A load bank may be used on a short term basis to address intermittent power fluctuations that may occur as a result of bringing on a second turbine for project ramp-up, with the plan of operating both turbines simultaneously.	Yes	Monitor, record, and report in accordance with Condition 20.1 through 20.2.
AQ0417TVP03 – Condition 23	40 CFR 60.7(b)	NSPS Subpart A Startup, Shutdown, and Malfunction Requirements	Maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the emission unit and malfunctions of associated air-pollution control equipment.	Yes	Record Review
AQ0417TVP03 – Condition 24	40 CFR 60.7(c)	NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report	Submit Excess Emission and Monitoring Systems Performance Report (EEMSP) as specified in this Condition.	Yes	Record Review
AQ0417TVP03 – Condition 25	40 CFR 60.7(d)	NSPS Subpart A Summary Report Form	Submit to ADEC and EPA semiannually a summary report form or EEMSP as specified in this Condition.	Yes	Record Review

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 26	40 CFR 60.8	NSPS Subpart A Performance (Source) Tests	Conduct performance tests according to 40 CFR 60.8 and Section 6 of the TV Permit at such other times as may be required by EPA and provide the ADEC and EPA with a written report of the results.	Yes	Record Review
AQ0417TVP03 – Condition 27	40 CFR 60.11(d)	NSPS Subpart A Good Air Pollution Control Practice	At all time, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the emission unit including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.	Yes	Reasonable Inquiry / Record Review
AQ0417TVP03 – Condition 28	40 CFR 60.11(g)	NSPS Subpart A Credible Evidence	For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of the standards set forth in Conditions 32 and 33 nothing in 40 CFR Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU ID 500 would have been in compliance with applicable requirements of 40 CFR Part 60 if the appropriate performance or compliance test or procedure had been performed.	N/A	Information condition only

Permit and Condition Number	Applicable Requirement Citation[1]	Parameter/ Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0417TVP03 – Condition 29	40 CFR 60.12	NSPS Subpart A Concealment of Emissions	The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	Yes	Reasonable Inquiry
AQ0417TVP03 – Condition 31	40 CFR 60.332(a)(2) & (d)	NSPS Subpart GG NO_X Standard	Do not allow the exhaust gas concentration of NO_X to exceed 191 ppmvd at 15 percent O_2, ISO, dry exhaust basis.	Yes	Monitor, record, and report according to Conditions 32.2 through 32.4.
AQ0417TVP02, Rev 2 – Condition 33	40 CFR 60.333(b)	NSPS Subpart GG SO_2 Standard	Do not allow the sulfur content for the fuel burned in EU to exceed 0.8 percent by weight.		Monitor, record, and report according to Condition 34.
New Condition	18 AAC 50.326(j)(4)	NSPS Subpart GG Turbine Engine Replacement	See Attachment B-1.	Yes	See Attachment B-1.

[1] Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Non-applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request*):

Non-Applicable Requirements[1]	Reason for non-applicability and citation/basis
40 CFR 60.7(a)(1) & (3), 60.8(a)	Obsolete requirements. Initial notification and performance testing completed.
40 CFR 60.7(a)(4)	This requirement only applies to "existing facilities," as defined in 40 CFR 60.2.
40 CFR 60.332(a)(1)	Emission unit is not an Electric Utility Stationary Gas Turbine as defined in 40 CFR 60 Subpart GG.
40 CFR 60.334(a), (b), & (d), and 60.335(b)(4)	Emission unit is not equipped with water injection to control emissions of NO_X.
40 CFR 60.334(e) & (f)	Emission unit commenced construction prior to July 8, 2004.
40 CFR 60.334(g)	Emission unit is not subject to continuous monitoring requirements in 40 CFR 60.334(a), (d), or (f).
40 CFR 60.334(h)(2)	The allowance for fuel bound nitrogen to calculate the NO_X emission limit under 40 CFR 60.332 has not been claimed.
40 CFR 60 Subpart KKKK	Emission unit has not commenced construction, modification, or reconstruction after February 18, 2005.
40 CFR 63 Subpart YYYY	The affected facility is not a major source of hazardous air pollutants (HAPs).

[1] Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Attachment B-1
Proposed New Requirements Specific to Emissions Unit

Form B2 – Emission Unit Detail Form – Internal Combustion Equipment (Engines and Turbines)
New Requirements Specific to EU ID 500 and 501

Through discussions between Savant Alaska, LLC, U.S. Environmental Protection Agency (EPA), and the Alaska Department of Environmental Conservation (ADEC) on April 19, 2023, a determination was made regarding ongoing performance source testing for core engine replacements for turbines affected under 40 Code of Federal Regulations (CFR) 60 subpart GG. That determination allows the Permittee to continue ongoing performance testing according to an existing schedule for Emissions Unit ID 500 or 501 when an identical core engine replacement occurs for a turbine where a modification or reconstruction, as those terms are defined in 40 CFR 60 subpart A, does not occur. Therefore, Savant Alaska, LLC requests that the application include the following new conditions applicable to EU IDs 500 and 501 to include the proposed related requirements.

Turbines Subject to NSPS Subpart GG, EU IDs 500 and 501

1. **Turbine Engine Replacements.** The Permittee may replace turbine engines of the same make and model as EU IDs 500 and 501 to allow for maintenance. Condition [1.a] through [1.e] apply only to gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour.

    a. For a turbine engine replacement, the Permittee shall comply with the requirements of NSPS Subpart GG as set out in Conditions [31] through [34.4.c] and may elect to continue the performance testing schedule in effect for the turbine at the time of engine replacement.

    b. The Permittee shall maintain, for each turbine engine, records of the maintenance, repairs, parts replacement, including the date of each servicing, the service performed, and the costs of the service.

    c. The Permittee shall maintain records of the following information each time a turbine engine is switched into service:

        i. The date the switched occurred; and

        ii. Identification of the removed turbine and the substitute turbine engine by make, model, date of manufacture, serial number, maximum heat input, and location.

    d. The Permittee shall notify the Department in writing no later than 14 days after any rotation of a Subpart GG turbine into an operating turbine position.

    e. The Permittee shall submit a copy of the records required by Condition [1.c] with the operating report for all turbine engines switched during the reporting period.

[18 AAC 50.040(j) & 50.326(j)]