From:	Lisa Haas
To:	Jones, Dave F (DEC)
Cc:	Frank Richards; Katie Blake; Chris Humphrey; Brad Chastain; Simpson, Aaron J (DEC); Plosay, James R (DEC)
Subject:	RE: [with addendum] Letter from NPCA requesting permitting records and extension
Date:	Wednesday, November 4, 2020 8:30:54 AM
Attachments:	Air CBI Release Table 11_3_2020.docx

Hi Dave,
Attached is an updated table with the two additional documents highlighted and approved for release. After further consideration, we decided not to remove the GTP information from the January 10, 2020 document because it was essentially released with the January 14, 2020 document. I believe this fully addresses item #3 in the NPCA letter.

Has ADEC decided how to address the other NPCA letter items? Let us know if there is anything we can do to assist and/or whether a Teams meeting to discuss would be useful.

We are working on the NPS electricity cost question. To get that number, we need input from the engineers who did the cost estimation work for the Liquefaction Facility and we should have a schedule back from them soon.

Thank you,
Lisa

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Tuesday, November 3, 2020 2:47 PM
To: Lisa Haas <lhaas@agdc.us>
Cc: Frank Richards <FRichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Lisa,

I think that would be acceptable to provide the document without the pages that were specific to the GTP.

Regards,

Dave Jones
Env. Engineering Assistant II
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122

From: Lisa Haas <lhaas@agdc.us>
Sent: Tuesday, November 3, 2020 2:38 PM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Cc: Frank Richards <frichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

Hi Dave, the second document has information for both GTP and the Liquefaction Facility, and there isn't a good reason to release that cost data for GTP at this point. The sections for each are clearly marked, so it would be relatively easy for us to provide a version that is minus the GTP data. Would that be acceptable?
Thank you,
Lisa

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Tuesday, November 3, 2020 10:33 AM
To: Lisa Haas <lhaas@agdc.us>

Cc: Frank Richards <FRichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

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Lisa,

In going through the various submissions received by the Department I also found the following two items marked as confidential that I am requesting you add to the Table for release from CBI.

September 2018 – Submittal_CBI: 2018-09-24_AQ1539CPT01 Response to Incompleteness Finding.pdf
January 14, 2019 – Submittal_CBI: There was an initial PDF sent on January 10, 2019 that was corrected on January 14, 2020. Please include the initial PDF submittal as 2020-01-10_Alaska LNG_BACT Cost Effectiveness.pdf

Regards,

Dave Jones
Env. Engineering Assistant II
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122

From: Lisa Haas <lhaas@agdc.us>
Sent: Monday, November 2, 2020 12:49 PM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Cc: Frank Richards <frichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

Hi Dave, attached is the table in a Word document to make it easier to read. Please let us know if you have questions. We look forward to hearing your decision on path forward.
Thank you,
Lisa

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Monday, November 2, 2020 12:16 PM
To: Lisa Haas <lhaas@agdc.us>
Cc: Frank Richards <FRichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>; Plosay, James R (DEC) <jim.plosay@alaska.gov>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Lisa,

Great news on AGDC being able to release the listed items in your email from being considered confidential. However, I noticed that the left end of table in your email is cut off and some of the submittal dates are missing. Could you re-send the full table so that the Department is sure of the material we are allowed to release? I will begin to go through the application materials we have to verify that this is everything that was submitted as confidential.

The Department is still determining what other portions of NPCA's request we are going to release as a portion of the public record and what will need to be FOIA'd, as well as if we will be extending the public comment period and for how long if we do. We will keep AGDC in the loop as we move forward with these determinations.

Regards,

Dave Jones
Env. Engineering Assistant II
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122

From: Lisa Haas <lhaas@agdc.us>
Sent: Friday, October 30, 2020 4:26 PM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>; Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>
Cc: Frank Richards <frichards@agdc.us>; Katie Blake <KBlake@agdc.us>; Chris Humphrey <Chris.Humphrey@exp.com>; Brad Chastain <BChastain@agdc.us>
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

Hi Dave and Aaron,

Thank you for sharing the NPCA letter yesterday. To help respond to Item #3 of the letter, AGDC has reviewed the confidential information submitted for the Liquefaction Facility air permit as detailed in the table below. Based on our review, we agree the listed items can be released to the public as part of the air permitting process. We quickly made the decision to release this information to allow ADEC to continue processing the permit and to simplify ADEC's process of responding to the NPCA letter. We believe this table covers all of the information we submitted as CBI. If you identify any other files with that classification, please let us know and we will provide a similar review.

With regards to the request for ADEC's native files in Item #2 – the request seems inconsistent with ADEC's role as a regulatory agency. We similarly have not seen those files and, if there is a decision to release, would appreciate the chance to understand and discuss any components used from our project-submitted information.

Items #4 and #5 on the NPCA letter appear to be FOIA requests that will take time and money for ADEC to respond. We do not believe that should be part of the permitting process or used to extend the public comment period.

The NPCA issues do not warrant a 60-day extension on the already-extended permit comment period. We encourage ADEC to publish the information requested in Item #1 (Remaining Permit Application Materials) and #3 (Disclosable Portions of the Permit Applicant's Application) on the web site over the next several days and to stick with the existing comment period.

Thank you,
Lisa

	Description/File Name	**Comments**
1, 2018 Initial cation Submittal	6_Liquefaction Plant BACT Analysis.pdf 12_Trade Secret_cost effectiveness_Compression Turbines 12_Trade Secret_cost effectiveness_Power Gen Turbines	Item 12 was CBI based on vendor supplied cost information. However, subsequent BACT RFI responses have used that information in the public submittals. Further, ADEC has requested updated vendor quotes in subsequent RFIs that have been submitted without CBI. **This information can be released to the public for the purposes of processing the Alaska LNG Liquefaction Facility air permit.**
ember 2018 ittal_CBI	Attachment 3_LNG Diesel BACT Appendices A-C.zip	Information was designated as CBI for consistency with the approach above. **This information can be released to the public for the purposes of processing the Alaska LNG Liquefaction Facility air permit.**
ary 14, 2020 ittal_CBI	2020-01-14_Alaska LNG_BACT Cost Effectiveness Response.pdf A.4_5_LNG_SCR Eval 6thEd- Turbines (AeriNOx Facility Spec and EPA Defaults)_R1.xlsx B.4_LNG_SCR 7th Edition_PGTurbine.xlsm B.5_LNG_SCR 7th Edition_Compressor - 15 to 2ppm.xlsm	Information was designated as CBI for consistency with the approach above. **This information can be released to the public for the purposes of processing the Alaska LNG Liquefaction Facility air permit.**
, 2020	Attachments: 2020-07-01_AGDC Response to	One of the attachments was an update BACT cost effectiveness spreadsheet and was considered CBI based on consistency of the

ittal_CBI	ADEC RFI-683.pdf	original approach for that information. The other attachments in the RFI were extracted Geotech information from the RR13 Appendix I Seismic Reports. The documents are labeled confidential (JVA default) but included in the Public appendix in the FERC application – so already in the public domain. **This information can be released to the public for the purposes of processing the Alaska LNG Liquefaction Facility air permit.**

From: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Sent: Thursday, October 29, 2020 2:48 PM
To: Lisa Haas <lhaas@agdc.us>
Cc: Simpson, Aaron J (DEC) <aaron.simpson@alaska.gov>
Subject: FW: [with addendum] Letter from NPCA requesting permitting records and extension

[EXTERNAL EMAIL] DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe.

Lisa,

Here is the request we received from the National Park Conservation Association.

Regards,

Dave Jones
Env. Engineering Assistant II
ADEC – Air Quality – Juneau
dave.jones2@alaska.gov
907.465.5122

From: sara@laumannlegal.com <sara@laumannlegal.com>
Sent: Thursday, October 29, 2020 10:18 AM
To: Jones, Dave F (DEC) <dave.jones2@alaska.gov>
Cc: Stephanie Kodish <skodish@npca.org>; jadams@npca.org
Subject: RE: [with addendum] Letter from NPCA requesting permitting records and extension

Hi Dave,

I'm following up with an addendum to NPCA's request.

For Item #1 in the letter, we'd like to add the following

- Any new or revised dispersion modeling information relied upon by ADEC, and
- We'd appreciate obtaining access to download the actual dispersion modeling input/output files that match with the information in the TAR.

And reattaching the letter to this email so that you have it and the addendum in one document.

Thanks again,
Sara

Sara L. Laumann
Principal
303-619-4373
sara@laumannlegal.com
laumannlegal.com

From: sara@laumannlegal.com <sara@laumannlegal.com>
Sent: Thursday, October 29, 2020 12:07 PM
To: 'Jones, Dave F (DEC)' <dave.jones2@alaska.gov>
Cc: Stephanie Kodish <skodish@npca.org>; 'jadams@npca.org' <jadams@npca.org>
Subject: Letter from NPCA requesting permitting records and extension

Hi Dave,

On behalf of NPCA, attached is a letter that contains a revised scope of our request for records related to ADEC's proposed PSD permit approval for the AGDC's Liquefaction Plant.

Once ADEC makes these additional documents available, the letter requests an extension to the comment period so that we have time to review and provide meaningful feedback on behalf of NPCA.

I'll give you a call this afternoon to discuss.

Thanks,
Sara

Sara L. Laumann
Principal
303-619-4373
sara@laumannlegal.com
laumannlegal.com

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