From: Simpson, Aaron J (DEC)
To: Lisa Haas
Cc: Plosay, James R (DEC); Jones, Dave F (DEC); Renovatio, James J (DEC); Renovatio, James J (DEC)
Subject: Information Request related to flaring for AGDC"s Liquefaction Plant
Date: Thursday, May 12, 2022 1:41:51 PM

Lisa,

The Department is requesting assistance in responding to public comments for AGDC's Liquefaction Plant construction permit submitted by Sara Laumann on behalf of the National Parks Conservation Association, Center for Biological Diversity, and Northern Alaska Environmental Center and by Jessica Winnestaffer on behalf of the Chickaloon Village Traditional Council.

Please provide a detailed evaluation of potential alternative control technologies for the flares, EUs 14 – 19, related to the technical feasibility of replacing the flares with thermal oxidizers/incinerators and capturing excess gas for use at the facility or other off-site locations. In this evaluation, please identify any control technologies associated with these types of emissions units (e.g., low NOx burners for thermal oxidizers/incinerators). Please see comments from NPCA including the Stamper Report.

If it is shown that other technologies are infeasible, or cost ineffective, please provide a flare minimization plan that indicates how AGDC proposes to limit flaring at the stationary source. Please indicate in the plan what practices will be used to reduce emissions during startups, shutdowns, process upsets, and other maintenance events. Areas that need to be addressed can be found in the Stamper Report. The Department intends to include the plan in the permit as enforceable conditions.

It's my understanding that Dave Jones sent all of the comments to you on December 14th, 2020 via File Transfer Protocol. Please let me know if you don't have them or have any questions. The state email system is blocking the comments from being sent to you directly via attachments.

Thank you,

Aaron Simpson
Environmental Engineering Associate II
Air Permits Office Supervisor, Juneau
Alaska Department of Environmental Conservation
[907] 465-5123