

From: [Jones, Dave F \(DEC\)](#)
To: [Lisa Haas](#)
Cc: [Simpson, Aaron J \(DEC\)](#); [Renovatio, James J \(DEC\)](#); [Plosay, James R \(DEC\)](#)
Subject: Ex Parte: Information Request to Assist in Response to Comments
Date: Friday, May 27, 2022 4:29:00 PM

Lisa,

The Department is requesting assistance in responding to public comments for AGDC's Liquefaction Plant construction permit. Please provide the following information that will assist the Department in responding to comments received during public notice:

1. Provide a fugitive dust control plan for the construction phase of the project that will be included in the permit with a Condition that sunsets once construction activities have completed. The fugitive dust control plan should offer a level of detail that is sufficient to ensure that the construction activities associated with the Liquefaction Plant will not cause or contribute to an exceedance of the NAAQS.
2. Provide a discussion related to how the mercury removal bed will operate including: any potential mercury emissions and whether they are activated carbon beds.
3. How will leakage from the LNG storage tanks and piping throughout the facility be monitored. Is the facility subject to leak detection requirements under any NSPS or NESHAP Subparts?
4. Provide updated CO and VOC best available control emission rates that take into account the addition of oxidation catalysts on the turbines, since the preliminary permit used an AP-42 emission factor of 0.0022 lb/MMBtu for VOC and a 5 ppmv emission factor for CO. The VOC emission rate is an uncontrolled emission factor from AP-42. The majority of combined cycle turbines in the RBLC achieve 2 ppmv for CO with oxidation catalysts. There are 10 findings in the RBLC for simple cycle turbines with oxidation catalysts, three of which achieve 2 ppmv or lower.
5. Provide a cost analysis on positive crankcase ventilation to control particulate emissions on EU 12.

Regards,

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