

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY OPERATING GENERAL PERMIT A

### RESPONSE TO COMMENTS

**Public Comment Closing Date: May 3, 2010**  
Fuel limited Small Diesel Electric Generators

The public comment period for the General Operating Permit GPA03 closed on May 3, 2010. Comments were received from the North Slope Borough and TDX Adak and appear exactly as submitted. This document lists each comment with ADEC's responses.

#### **Brett Goodwin, Manager, Power and Light North Slope Borough**

1. This notice states that Nuiqsut Power Plant has a pending application for a GPA. North Slope Borough wishes to make it clear to the Department that Nuiqsut Power Plant has not submitted an application for GPA. Nuiqsut Power Plant recently received its final Minor Source Specific Permit (AQ0352MSS01). Nuiqsut ceased to qualify for a GPA following installation of two natural gas power generators.

Please ensure that all branches of the Department are made aware that Nuiqsut Power Plant is no longer permitted under a general permit. NSB has submitted GPA renewal applications for Point Hope and Wainwright Power Plants, only.

***Response:** The Department appreciates this clarification. Our review of Air Permits Program records confirmed that the North Slope Borough had applied for yet not received their minor permit at the time the Department published the Renewal General Permit. The April 21, 2010 Minor Permit AQ0325MSS01 caps Nuiqsut Power Plant emissions to less than the applicable threshold for this general permit. The Project team will process your letter as a request to rescind the current letter of authorization under the current GPA effective April 21, 2010 and adjust your records and accounts accordingly.*

2. Incorrect Calculation of PTE  
Statement of Basis Page 2, Table A

Page 7, Condition 12 in the Draft Permit; Page 9, Item 3.2 in the TAR

Comment:

The calculated total of PTE is 369.4. The calculated total Assessable PTE is 369.2. Please modify Table A to read as follows:

Pollutant	NOx	CO	PM-10	SO2	VOC	HAPs	Total
PTE	249.5	53.8	17.5	28.6	19.8	0.2	369.4
Assessable PTE	249.5	53.8	17.5	28.6	19.8	0	369.2

**Response:** *The Department has corrected the typographical error on the PTE line of Table A as noted.*

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**Chris Menefee, Hoefler Consulting Group on behalf of TDX Adak**

1. Condition 19 specifies NSPS Subpart III standards that apply to stationary combustion engines that were constructed, modified, or reconstructed after July 11, 2005. The terms “modification” and “reconstruction” are defined by footnotes 7 and 8 respectively. The definitions that ADEC has used in footnotes 7 and 8 are not the correct definitions of “modification” and “reconstruction” for emission units that are subject to NSPS Subpart III. Please revise footnotes 7 and 8 to reflect the correct definitions NSPS Subpart III definitions for “modification” and “reconstruction”. Footnote 7 should be revised to read “As defined in 40 CFR §60.14.”. Footnote 8 should be revised to read “As defined in 40 CFR §60.15.”.

**Response:** *The definitions in the public notice draft cross referenced 18 AAC 50.990 instead of the Federal New Source Performance Standards (NSPS). The regulatory definition for “modification” and for “reconstruct” or “reconstruction” is as set out in NSPS 40 CFR 60.14 and 60.15 respectively as noted by the commentator. The cross referenced 50.990 does not list these NSPS definitions. Therefore, the Department concurs to correct these footnotes as suggested by the commentator. In the final draft permit footnote, the Department also added the State air quality control provision that incorporates these NSPS definitions by reference under State Regulations.*