

February 10, 2025

State of Alaska Dept. of Environmental Conservation Division of Air Quality
Attn: James Plosay
410 Willoughby Avenue, Suite 603
Juneau, Alaska 99811-1800

RE: Air Quality Construction Permit No. AQ1524CPT01 – Alaska LNG Gas Treatment Plant Permit
Extension Request and Updated Application

Dear Mr. Plosay:

The Alaska Gasline Development Corporation (AGDC) was issued the subject Air Quality Construction Permit for the Gas Treatment Plant (GTP) located in Prudhoe Bay, Alaska on August 13, 2020. We requested and received a second permit extension from ADEC on July 14, 2023 to allow time for completion of the necessary pre-construction project activities including Front-End Engineering Design (FEED). As stipulated in ADEC's July 2023 extension letter, we understood that a request for 3rd extension would require submittal of an updated application. Further AGDC and ADEC staff met on April 2, 2024 to outline requirements of the re-application package. Accordingly, and as specified in Condition No. 2 of the permit, AGDC is requesting an 18-month extension of the permit start date to allow additional time for completion of the necessary pre-construction project activities including final design, and provides the enclosed construction permit application for ADEC review and approval.

The enclosed application includes an updated Best Available Control Technology (BACT) analysis. Outside engineering input was contracted to complete the BACT assessment, including updates to the cost and other technical data. The enclosed application also includes an updated applicable requirements table that reflects changes in regulatory requirements that have occurred since 2020.

All other elements of the prior application remain unchanged. This application incorporates by reference the prior application and supporting information for the construction permit issued for this facility. A copy of the prior permit and Technical Assistance Report (TAR) are included as Attachment 4 in this submittal.

Please contact Lisa Haas (907-947-9353, lhaas@agdc.us) if have you have any questions on our extension request.

Sincerely,



Frank T. Richards
President

cc:

Dave Jones, ADEC
Lisa Haas, AGDC

**Alaska Department of Environmental Conservation
AIR QUALITY CONSTRUCTION PERMIT APPLICATION**



Project Information Form

Section 1 Stationary Source Information

Stationary Source Name: Gas Treatment Plant (GTP)			SIC: 1311
Project Name (if different): Alaska LNG	Stationary Source	Frank T Richards	
Source Physical Address: Prudhoe Bay, Alaska	City: Anchorage	State: AK	Zip: 99503
	Telephone: 907-330-6352		
	E-Mail Address: Frichards@agdc.us		
UTM Coordinates (m) or Latitude/Longitude:	Northing:	Easting:	Zone:
	Latitude: 70.3199	Longitude: 148.5573	

Section 2 Legal Owner

Section 3 Operator (if different from owner)

Name: Alaska Gasline Development Corporation			Name: Same as Owner		
Mailing Address: 3201 C Street, Suite 505			Mailing Address:		
City: Anchorage	State: AK	Zip: 99503	City:	State:	Zip:
Telephone: 907-330-6300			Telephone:		
E-Mail Address: Frichards@agdc.us			E-Mail Address:		

Section 4 Designated Agent (for service of process)

Section 5 Billing Contact Person (if different from owner)

Name: N/A			Name: Olena Brusuelas		
Mailing Address:			Mailing Address: 3201 C Street, Suite 200		
City:	State:	Zip:	City: Anchorage	State: AK	Zip: 99503
Physical Address:			Telephone: 907-330-6362		
City:	State:	Zip:	E-Mail Address: accounting@agdc.us		
Telephone :					
E-Mail Address:					

Section 6 Application Contact

Name: Lisa Haas				
Mailing Address: 3201 C Street, Suite505		City: Anchorage	State: AK	Zip: 99503
		Telephone: 907-947-9353		
		E-Mail Address: LHaas@agdc.us		

Section 7 Major Permit Classification(s)

(Check all that apply)

- 18 AAC 50.306
- 18 AAC 50.311
- 18 AAC 50.316

Section 8 Minor Permit Classification(s)

(Check all that apply)

- 18 AAC 50.502(b)(1)
- 18 AAC 50.502(b)(2)
- 18 AAC 50.502(b)(3)
- 18 AAC 50.502(b)(4)
- 18 AAC 50.502(b)(5)
- 18 AAC 50.502(b)(6)
- 18 AAC 50.502(c)(2)(A)
- 18 AAC 50.502(c)(2)(B)
- 18 AAC 50.502(c)(3)
- 18 AAC 50.508(3)
- 18 AAC 50.508(5)
- 18 AAC 50.508(6)

PROJECT IDENTIFICATION FORM

Section 9 Project Description

Provide/attach a short narrative describing the project. Discuss the purpose for conducting this project, what emission units/activities will be added/modified under this project (i.e., project scope), and the project timeline. If the project is a modification to an existing stationary source, describe how this project will affect the existing process. Include any other discussion that may assist the Department in understanding your project or processing your application. Include a schedule of construction and the desired date for permit issuance.

If this application includes an Owner Requested Limit or a request to revise an existing permit term or condition, describe the intent of the limit, and provide sample language for the limit, and for monitoring, record keeping, and reporting for showing compliance with the limit.

Add additional pages if necessary.

This application is an update to the original December 2017 application as required for extending the existing GTP Construction Permit No. AQ1524CPT01 (see Attachment 4). Please see updated Attachment 1, Construction Permit Application Information Reference Table for Alaska LNG Gas Treatment Plant (GTP), for the location of additional project description information.

A listing of emissions units to be added at GTP under this project is provided in the following table:

EU ID	Source Description	Fuel Type	Nominal Capacity	Pilot/Purge Capacity	Capacity Units
1 - 6	Treated Gas Compressors - Trains 1 - 3	Fuel Gas	42,000		kW
7 - 12	Byproduct (CO2) Compressors - Trains 1 - 3	Fuel Gas	26,000		kW
13- 18	WHRU Supplemental Firing Burners - TG Trains 1 - 3	Fuel Gas	190		MMBtu/hr
19 - 24	WHRU Supplemental Firing Burners - CO2 Trains 1 - 3	Fuel Gas	140		MMBtu/hr
25 - 30	Combustion Turbine Generators - 1 - 6	Fuel Gas	40,000		kW
31 - 33	Building Heater Medium Heaters - 1 - 3	Fuel Gas	280		MMBtu/hr
34 - 35	Buyback Gas Bath Heaters - 1 and 2	Fuel Gas	25		MMBtu/hr
36 - 38	Operations Camp Heaters - 1 - 3	Fuel Gas	32		MMBtu/hr
39	Black Start Generator	ULSD	2,500		kW
40 - 42	Main Firewater Pump Engines - 1 - 3	ULSD	190		kW
43	Dormitory Emergency Generator	ULSD	250		kW
44	Communications Tower Emergency Generator	ULSD	150		kW
45 - 46	HP Hydrocarbon Flares - East and West	Fuel Gas (p/p), Process Gas	76,000	7.3	mscfh
47	LP Hydrocarbon Flares - East and West	Fuel Gas (p/p), Process Gas	4,200	1.3	mscfh
49 - 50	HP Byproduct (CO2) Flares - East and West	Fuel Gas (p/p), Process Gas	9,500	2.7	mscfh
51 - 52	LP Byproduct (CO2) Flares - East and West	Fuel Gas (p/p), Process Gas	29,000	6.3	mscfh

PROJECT IDENTIFICATION FORM

Section 10 Certification

This certification applies to the Air Quality Control Construction Permit Application for the: Alaska LNG Gas Treatment Plant
submitted to the Department on: _____ (Stationary Source Name)


Type of Application

- Initial Application
- Change to Initial Application

The application is **NOT** complete unless the certification of truth, accuracy, and completeness on this form bears the **signature of a responsible official** of the firm making the application. (18 AAC 50.205)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

“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.”

Signature: 	Date: 2/10/2025
Printed Name: Frank Richards	Title: President

Section 11 Attachments

- Attachments Included. List attachments:

Attachment	Name of Attachment
1	Construction Permit Application Information Reference Table
2	GTP BACT Analysis (with associated appendices)
3	Confidentiality Materials
4	Existing ADEC Permit

Section 12 Mailing Address

Submit the construction permit application to the Permit Intake Clerk in the Department’s Anchorage office. Submitting to a different office will delay processing. The mailing address and phone number for the Anchorage office is:

Permit Intake Clerk
Alaska Department of Environmental
Conservation Air Permit Program
555 Cordova Street
Anchorage, Alaska 99501
(907) 269-3070