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Cc: [Boyden, Zachary C \(DEC\)](#)
Subject: AQ1524CPT02; Information Request
Date: Monday, November 17, 2025 12:09:00 PM

Lisa Haas,

You may be getting this email twice, because I had sent this email to your older AGDC address as well.

I'm reaching out about the Gas Treatment Plant's (GTP's) current application for AQ1524CPT02. Below are general questions and questions specific to modelling from Zach Boyden. Additionally, I just wanted to let you know there may be questions specific to BACT sometime in the future.

General Questions:

- I believe there was a change in ownership that occurred after the cover letter for the application for AQ1524CPT02 was submitted. Could you provide an updated contacts list with updated information for the designated agent, operator, billing contact, etc., if any of those have changed?
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Ambient Impact (Modeling) Questions:

1. Consultant
 - a. A new modeling review is being performed for the CPT02 ambient demonstration. Who should be listed as the consultant company that prepared the ambient demonstration?
2. Specific EU questions
 - a. I understand that the latest ambient demonstration updated the previous demonstration provided for AQ1524CPT01, and followed the same assumptions and modeling techniques from the Department's previous modeling review.
 - b. Could you confirm that the previous modeling scenario for the **Combustion Turbines** (EU IDs 25 – 30) was used for the current modeling?
 - i. These units were noted in the previous review to be modeled at 100% emissions and 60% load exhaust conditions. Were these parameters continued in the latest

demonstration?

- ii. Were the one-hour model runs still modeled using 110% emission rates (an addition of 10% safety rating)? Do you know why this was added for the one-hour model runs but not the other short term standards (3-hour or 24-hour)?
 - c. Did the **Compressor Turbines** (EU IDs 1 – 12) also have a load analysis performed? The documentation from the previous application mentioned that the compressor turbines had both normal and supplemental modes, and that the supplemental mode fired between 80, 85, and 100% load.
 - d. Could you confirm the liquid-fired and gas-fired **sulfur levels** stayed at 15ppmw and 96ppmv from the previous demonstration?
 - e. How much **emergency flaring** was assumed? The previous review noted the annual 500 hours per year assumption, but also specified that the original demonstration had a 30 minutes per day assumption. This then went through a sensitivity analysis to show full emissions at short-term modeling would not exceed standards. Was the 30 minutes per day emission rate used for the short-term modeling, or were these modeled at full emissions?
 - f. Regarding the **reciprocating engines**: were they modeled at 500 hours per year for both the annual as well as the short-term modeling runs? Or were these annualized for 1-hour and annual runs but kept at full emissions for 3-hour and 24-hour modeling?
3. Receptors and ambient air boundary:
- a. The receptor grid appears to exclude areas within several pads, using the pad boundaries as ambient air boundaries. This is acceptable for the two western pads which are the GTP pad and camp pad. However, the eastern pads for the Central Compressor Plant and Central Gas Facility (CCP and CGF) as well as their support pads are excluded from the receptor grid. Do you know why these were excluded?
 - i. The previous modeling review notes that these other pads were excluded from ambient air because they were previously assessed. Do you know what the previous assessment is?
 - ii. This section of the previous modeling review cites several ambient air boundary

guidance documents, from both the ADEC and EPA. In my reading, these documents support including the ambient air around offsite sources, though they do describe the scenario in which offsite source impacts may be excluded from given receptors. This scenario is where an offsite source does not impact the offsite source's own ambient air boundary. However, the GTP receptor grid excluded both the offsite sources and the GTP's impacts from inside the offsite source ambient boundaries. The guidance does not support excluding both of these impacts.

4. Met Data

- a. Was AERMINUTE used on the met data, or was the pre-processed met data used?

5. Model Runs

- a. The modeling analysis in the latest ambient demonstration says that modeling was performed for all pollutants and averaging periods which showed an exceedance of the SIL. What were the **SIL model results**? Could you provide these SIL model runs for the revised demonstration?
- b. The Increment model run for 24-hour PM2.5 did not include any offsite sources. The offsite emissions units were included in all other increment model runs. Were these supposed to be excluded from this increment model run?

6. Additional Impact Analyses:

- a. The **PSD Additional Impact Analyses** (Associated Growth, Visibility, Soil & Vegetation) were not included in the latest ambient demonstration. Were they performed again?
- b. The **Ozone Impacts** were also not included in the latest ambient demonstration. Was this updated?

7. Housing Policy

- a. The ambient air may exclude worker housing if the only staff permitted there are on call. This was performed for both the previous and latest ambient demonstrations, and is frequently used for North Slope sources. Could you confirm that 8 Star has a policy in place for this?

If you have any questions or concerns, please feel free to contact either of us. Zach Boyden's phone number is 907-269-7582. He has also been cc'd.

Thanks,

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