	Alaska Gasline Development Corporation Alaska Department of Environmental Conservation Information Request for AGDC Liquefaction Plant Permit No. AQ1539CPT01	Date: June 14, 2022
	PUBLIC	Page 1 of 2

## DATA REQUEST REFERENCE INFORMATION

Agency	Data Request Date	Letter Request No.
ADEC	June 13, 2022 (via e-mail)	RFI-693

### ADEC REQUEST:

After reviewing AGDC's response to the Department's information request, we are requesting additional information related to the total number of hours of startup for each of the compressor and power generation turbines over a rolling 12-month period. Please provide an estimate of total number of hours that is expected for startups when the exhaust stream is not being controlled with selective catalytic reduction and oxidation catalysts. Additionally, please provide CO and VOC emission rates during these periods of startup when the oxidation catalyst is not up to temperature.


The Department will require these to be federally enforceable limits in the permit. BACT limits apply at all times of operation and if numerical emission rates cannot be enforced, an operational practice is acceptable.

Please provide this information by June 17th considering the Department's intent to meet AGDC's desired timeline of having a final permit issued by June 30th.

### AGDC RESPONSE:

The total number of hours that are expected for startups when the exhaust stream is not being controlled with selective catalytic reduction and oxidation catalysts are shown in Table 1. The hours are based on 2hrs per shutdown/startup event and 20 events per 12-month period, per turbine emissions unit.

Table 1 also provides CO and VOC emission rates during these periods of startup when the oxidation catalyst is not up to temperature. The emissions rates would occur during a 2-hr shutdown/startup event. The total combined hourly rate for all turbine units per 2-hr event is provided in the table for the purposes of establishing an emissions limit.

	Alaska Gasline Development Corporation Alaska Department of Environmental Conservation Information Request for AGDC Liquefaction Plant Permit No. AQ1539CPT01	Date: June 14, 2022
	PUBLIC	Page 2 of 2

**Table 1. Estimated Startup CO and VOC Emissions**

EU ID	Emissions Unit Description	12-month rolling Startup Hours (hrs)	CO Emissions Rate w/o Oxidation Catalyst Control (lb/hr)	VOC Emissions Rate w/o Oxidation Catalyst Control (lb/hr)
1	Train 1a Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
2	Train 1b Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
3	Train 2a Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
4	Train 2b Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
5	Train 3a Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
6	Train3b Simple Cycle Treated Gas Compressor Turbine	40	63.65	2.62
7	Power Generation Turbines	40	7.91	0.97
8	Power Generation Turbines	40	7.91	0.97
9	Power Generation Turbines	40	7.91	0.97
10	Power Generation Turbines	40	7.91	0.97
<b>Total</b>		<b>400</b>	<b>413.54</b>	<b>19.60</b>