From:	Lisa Haas
To:	Jones, Dave F (DEC)
Cc:	Simpson, Aaron J (DEC); Chris Humphrey; Frank Richards; Katie Blake
Subject:	AGDC Input: LF Permit and Flare Question
Date:	Friday, October 2, 2020 10:09:07 AM

Hi Dave,

AGDC has reviewed the Liquefaction Facility Preliminary Construction Permit AQ1539CPT01 issued for public comment on September 11, and offers a few minor corrections and one clarification for consideration.

Permit

- Page 34, Section 9: Two typos for spelling of Department (missing 't') associated with the April 28, 2020 and June 18, 2020 listings.

TAR

- Page 20, item (c): The indication after Water/Steam Injection showing (ULSD) appears to be a typo, as ultra-low sulfur diesel would not be applicable for gas-powered generators.
- Page 39, Table 5-3: The Emission Reduction (tpy) should be .84 tpy (rather than .90) per AGDC's Sept. 2018 BACT analysis response to ADEC's completeness requests.
- Appendix C, page 3 – one table is missing a number and should be Table C-5, which means the second table on that page should be C-6.

Modeling Report

- Page 33 (7.2): Typo: Kenai NWE should be Kenai NWR.
- Page 36, section 9.3, second paragraph: Reference to Attachment 10 of Resource Report 9 should be Attachment 10 of AGDC's permit application.

In addition, you had asked for more information on the fact that the potential to emit (PTE) estimate for flares at the liquefaction facility used emissions from four flares at 500 hours/flare when there are actually six total flares (three wet and three dry) planned on site. We confirmed the project design indicates that two (one wet and one dry) of the six total flares are spares and will not regularly operate. The spares will be brought on line when the operational flares are taken off line for maintenance. [Reference: Attachment 5, Appendix D to Alaska LNG Resource Report 9 (Liquefaction Facility Air Quality Modeling Report), Sections 4.1.1.1 and 4.1.2.4] Therefore, to be consistent with the design basis of the facility, AGDC suggests a flaring limit based on total throughput that would be the equivalent of four flares at 500 hours/flare (excluding pilot and purge, emergency, or process upset flaring). We also suggest Table 12 -Detailed Permanent EU Inventory and Potential to Emit (tpy) in the TAR Appendix A Emissions Calculation be revised to clarify that total emission with maximum flaring only includes emissions from 2 Dry Ground Flares and 2 Wet Ground Flares per facility design and operating constraints.

We are working on the questions from NPS that were forwarded on Wednesday and will have responses to you next week as requested. Please don't hesitate to call or e-mail if there are any additional questions.

Thank you,
Lisa

Lisa Haas | Environmental & Regulatory Manager| Alaska Gasline Development Corporation | **T** 907.947.9353 | lhaas@agdc.us

Alaska Gasline Development Corporation (AGDC) Privileged and Confidential Communication: This electronic mail communication and any documents attached hereto may contain AGDC confidential and privileged material for the sole use of the intended recipient(s) named above. If you are not the intended recipient of this message (or if you are not authorized to receive information for the recipient) any review, use, distribution, copying or disclosure by you or others is strictly prohibited. Please notify sender by reply email or telephone and delete and/or destroy this message and all attachments.