



# Chickaloon Village Traditional Council (Nay'dini'aa Na')

12 November 2020

Chief Gary Harrison,  
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*Vice-Chairwoman*

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Sondra Shaginoff-Stuart,  
*Member*

Philip Ling,  
*Member*

Karol Dixon,  
*Executive Director*

Serena Martino,  
*Executive Assistant*

Dave Jones  
Environmental Engineering Assistant II  
Department of Environmental Conservation (DEC)  
Division of Air Quality  
PO Box 111800  
Juneau, Alaska 99811-1800  
[dave.jones2@alaska.gov](mailto:dave.jones2@alaska.gov)

Re: Alaska Gasline Development Corporation, Liquefaction Plant, Air Permit  
AQ1539CPT01

Dear Mr. Jones:

Chickaloon Native Village is a federally-recognized Ahtna Dene' Tribe in southcentral Alaska, governed by the Chickaloon Village Traditional Council (CVTC). Our ancestral territory includes much of southcentral Alaska including upper Cook Inlet, our traditional area of influence overlaps neighboring Dena'ina Dene Tribes. Actions that occur within our traditional ancestral territory and customary area of use may impact our environment, our cultural resources, and the health of our Tribal citizens and community members. We pay particularly close attention to proposed permits that could negatively impact naturally occurring airsheds and watersheds that could affect our Tribal citizens. Chickaloon Native Village includes Cook Inlet in their area of interest, as a route that salmon and other fish, wildlifetake in returning to Chickaloon traditional use areas.

We appreciate receiving the notice regarding the air permit for the Alaska Gasline Development Corporation (AGDC) liquefaction plant in Nikiski. However, we would like to point out that a letter sent on September 11<sup>th</sup> with comments due October 11<sup>th</sup> is hardly "early notice" as the opening lines of the DEC letter stated. Given that this project will be built well into the future, if at all, please accept these comments submitted after the deadline.

## General comments

We make the following general comments.

- First, we object to construction of another large facility that ties our state economy to the fossil fuel industry.
  - We need to be transitioning jobs and the state economy away from fossil fuels.
  - Although LNG is labeled a "cleaner" fuel, the plant will heavily rely on diesel fuel. It will also engage in flaring. Both contribute to the already heavy load of greenhouse gases in our atmosphere. Currently our oceans are absorbing much of this load – with resulting declines in pH that affect shellfish directly, that increase harmful algal blooms, and that reach to and kill off critical

plankton at the bottom of the food chain potentially affecting aquatic life from salmon to seabirds. This is not how we steward the land and waters.

- The air permit states “*No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property*” (permit condition 25). It is becoming increasingly clear how fossil fuel extraction, refining, and transport are damaging the stable climate upon which we all depend, including the populations of plants, animals, and people.
- Second, the permit should explicitly allow DEC to make unannounced visits to determine compliance.

### Air permit

We make the following comments on specific sections.

- We object to flaring, currently allowed in the permit under Section 6.3, and the consequent release of methane into the atmosphere. As a potent greenhouse gas, this activity can be indirectly linked to the warming observed in streams in our area, the health impacts caused by increasing wildfires, and other impacts that affect us.
  - It appears that seven units will be allowed to emit 117 lb per MMBtu per year during flaring, along with another “thermal oxidizer” allowed to emit the same amount (Tables 6 and 8) for over 900 lbs of greenhouse gases permitted each year for each MMBtu.
  - Dry ground flares at 3 units, if flared at maximum, make up 61% of the total greenhouse gases from this plant.<sup>1</sup> What options are there to eliminate flaring?
- Fugitive dust control is only required from May-September (permit condition 10.1). Winds occur all year, therefore dust control should be required all year, and is feasible with chemical suppressants as are used at mining sites. This will require very good stormwater control.
  - Regardless of the time of year applied, if chemical suppressants are utilized, where does runoff water carrying these chemicals end up? Is it treated? It should not be discharged directly to water bodies.
  - The permit allows AGDC to submit a map of proposed air monitoring locations within 6 months from construction. Will this be part of a new public comment period? If not, how can the public comment on the appropriateness of the locations without any information?
  - Data collected through continuous or spot check air monitoring (permit condition 10.2) should be provided on a publicly accessible database.
- Exceedances of the air permit that threaten public health should be reported to the local community, not just provided to DEC (permit condition 23).

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<sup>1</sup> From Technical Analysis Report Table 12, each of the three Dry Ground Flare units releases 1.76 million tons per year of CO<sub>2</sub>e for a total of 5.27 million tons total per year. This is 61% of the 8.58 million tons per year of CO<sub>2</sub>e the plant is calculated to emit.

- Reporting to DEC is allowed “as soon as possible after the event is discovered”; this should be modified to “as soon as possible and not more than 24 hours after...”
- Is there potential for the emission of hydrogen sulfide?

#### **Technical analysis report**


- Page 3. “After passing through the mercury removal bed...”. How much mercury will be removed? Are these activated carbon beds? Where will this material be disposed of?
- Page 4. LNG storage tanks. How will leakage be monitored at the storage tanks, and at piping throughout the facility?
- Page 4. A marine terminal will be constructed. When will the permits for this construction activity come out, unrelated to air permits?
- Table 12. See comments above, regarding dry ground flares.

#### **Best Available Control Technology**

- Control options are allowed based in part on economics. To what degree is flaring allowed due to economics, rather than technical feasibility?
- We appreciate that Carbon Capture and Storage (CCS) was advanced to the economic analysis stage. As far as we are aware, this technology has only been commercially successful when coupled with re-injecting the CO<sub>2</sub> into oil wells for further oil extraction. Therefore this would be potentially only useful if coupled with oil drilling rigs in Cook Inlet. This option did not appear to be analyzed (page 18 Appendix B), resulting in a calculated cost of \$141-\$165/ton to remove CO<sub>2</sub> (Appendix B Table 3-11 and Table 3-12). While we believe the costs could theoretically be reduced if coupled with drilling, we would point out again the critical need to move off of, not permit more, fossil fuel projects.

Tsin’aen (thank you) for the opportunity to comment. You may contact Kendra Zamzow, Environmental Program Manager at (907) 354-3886 or at [klzamzow@chickaloon-nsn.gov](mailto:klzamzow@chickaloon-nsn.gov) with questions or comments.

May Creator Guide Our Footsteps,

  
Chief Gary Harrison (Nov 12, 2020 22:16 AKST)

Chief Gary Harrison  
Traditional Chief and Chairman

# 2020.11.12 AGDC Air Permit comments

Final Audit Report

2020-11-13

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