

AGDC Alaska LNG Liquefaction Plant draft permit – ambient impact review comments

Reviewer: Jay McAlpine, EPA Region 10, air permit modeling contact; 8 Dec. 2020

Comment ID	Document/ Section/ (Subject)	Comment
EPA-JDM-1	Permit Section 4; Condition 10 (fugitive dust)	The permit requires fugitive dust controls during summer months only. There may be rare events outside of the May – Sept. period where conditions are favorable for excessive fugitive dust emission. The EPA recommends Alaska DEC consider adding a requirement in the permit that also requires responsive fugitive dust mitigation in circumstances where excess dust emission is observed or measured, regardless of the time of year.
EPA-JDM-2	TAR, Appendix D, Section 7 (Class I impact analysis and FLM recommendation disclosure)	<p>The EPA recommends additional information be provided in the section of the TAR summarizing the input and recommendations of the Federal Land Managers, related to Class I area impact analysis. The additional disclosure would help demonstrate the fulfillment of the requirements under 40 CFR 52.21(p), adopted by reference in 18 AAC 50.</p> <p>Section 2.2 of TAR Appendix D indicates the FLMs were involved in the AQRV analysis process of the permit, but no references to supporting documentation and recommendations were evident in the TAR. Additional disclosure is especially important given a <i>cumulative</i> AQRV impacts analysis was necessary. The cumulative analysis efforts would necessitate coordination with the FLMs to identify appropriate cumulative thresholds (such as the critical loading factors used in the analysis) and modeling methodologies.</p>
EPA-JDM-3	TAR, Appendix D, Section 10.2 (Offsite emissions inventory for Class I increment analysis)	<p>The emissions from the Alaska LNG pipeline compressor and heater stations could be classified as secondary emissions (as defined in 40 CFR 52.21(b)(18)) because the emissions from these offsite facilities would occur as a result of the construction and operation of the Liquefaction Facility. Secondary emissions should be explicitly modeled in the source impact analysis (refer to 40 CFR 52.21(k)) if these emissions are specific, well-defined, quantifiable, and impact the same general area as the stationary source undergoing review (refer to 1990 Draft New Source Review Workshop Manual). The secondary emissions from these offsite sources were excluded from the modeling, primarily because they would not impact the same general area as the project source.</p> <p>However, the emissions from the Honolulu Creek Compressor Station (HCCS) may be of particular concern because the proposed location of the HCCS is on the path of the plume from the project source to the Class I Denali National Park and Preserve (DNPP) and is relatively near to the boundaries of DNPP (14 km). It is not clear if the emissions from the HCCS could impact the same general area of concern as the project source, which in this case would be the Class I Significant Impact Area (SIA) portion of DNPP (the Class I SIA would be the portion of Class I modeled receptors with project-emission impacts greater than the Class I Significant Impact Levels).</p> <p>It would be useful to identify the Class I SIA of Denali National Park (DNPP) to understand what portions of DNPP could be impacted by the project. If the SIA contains receptors in the vicinity of the HCCS, then additional review is warranted to determine if project impacts could cause or contribute to the violation of a Class I PSD increment, when HCCS impacts are accounted for. Namely, the PM_{2.5} 24-hour increment would be of concern, given the modeled maximum cumulative impact of 1.76 µg/m³ vs. the increment of 2.0 µg/m³ and given the HCCS NO_x emissions of 131.2 tpy which would contribute to PM_{2.5} impacts through secondary pollutant formation.</p>