

# STATE OF ALASKA

**DEPT. OF ENVIRONMENTAL CONSERVATION  
DIVISION OF AIR AND WATER QUALITY  
AIR PERMITS PROGRAM**

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<http://www.state.ak.us/dec/home.htm>

July 14, 2003

*File 10-2,0.0  
10-1,0.2*

Steve C. Maltby  
Agrium U.S. Inc.  
P.O. Box 575  
Kenai, AK 99611

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
NO: 7003 0500 0004 7869 6850**

Re: Agrium U.S., Inc., Kenai Nitrogen Operations (KNO): Final Decision to Issue Air Quality Control Permit-to-Operate No. 9923-AC004, Revision 1 (Project X181)

Dear Mr. Maltby:

Under the authority of AS 46.14.170, the Department of Environmental Conservation (ADEC) is issuing a final air quality control Permit-to-Operate No. 9923-AC004, Revision 1 for Agrium's KNO Facility. The final permit and Technical Analysis Report (TAR) are enclosed.

The terms and conditions of this construction permit remain effective until modified or revoked by ADEC, regardless of any change in ownership of the facility or its sources. The responsibilities imposed by this construction permit may not be transferred without the written consent of ADEC.

The only comment received during the public comment period was from Dan Bevington of the Kenai Peninsula Borough stating no objection to the proposed revision. ADEC has determined that the proposed modifications will not cause additional impacts to the coastal use or resource and therefore did not require a consistency review under Alaska Coastal Management Program provisions of 6 AAC 50.810.

Any person who disagrees with this decision may request an adjudicatory hearing in accordance with 18 AAC 15.195-340 or an informal review by the division director in accordance with 18 AAC 50.15.184. **Informal review requests** must be mailed to the Division Director, 555 Cordova, Anchorage, AK 99501 by Certified Mail, Return Receipt Requested within 15 days of the permit decision. **Adjudicatory hearing requests** must be mailed to the Commissioner of ADEC, 410 Willoughby Avenue, Suite 303, Juneau, AK 99801-1795, by Certified Mail, Return Receipt Requested within 30 days of the permit decision. If a hearing is requested, one copy of the request should be sent to the undersigned. If a waiver is not requested within 30 days, the right to appeal is waived. In addition, any other person who has a private, substantive, legally-protected interest under state law that may be affected by the permit action, or a person who participated in the public process, may request an adjudicatory hearing within 30 days of service of the action. If a hearing is granted, it will be limited to the issues related to this permit action. Even if a request for an adjudicatory hearing has been granted, all permit terms and conditions remain in full force and effect.

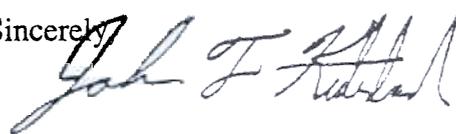
Steve Maltby  
Permit No. 9923-AC0004

-2-

July 14, 2003

Please note that Alaska's air quality statutes, regulations, and permit application information can be obtained from ADEC's web page at: <http://www.state.ak.us/dec/dawq/aqi/decaqi.htm>.

Sincerely,



John F. Kuterbach, Manager  
Air Permits Program

Enclosures: Permit No. 9923-AC004, Revision 1 and TAR

cc: Cynthia Espinoza, ADEC/AWQ/APP, Anchorage, AK  
Robert Cannone, ADEC/AWQ/APP, Fairbanks, AK  
Laurie Kral, EPA Region 10, Seattle, WA  
Daniel Bevington, Kenai Peninsula Borough, Soldotna, AK



ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
AIR QUALITY PERMIT

Permit No. 9923-AC004, Revision 1

Date: Final – July 14, 2003

The Department of Environmental Conservation (the Department), under the authority of AS 46.03, AS 44.19, AS 46.14, 6 AAC 50, and 18 AAC 50.315, issues an Air Quality Permit to:

**Owner and Operator:** Agrium Kenai Nitrogen Operations  
P.O. Box 575  
Kenai, Alaska 99611

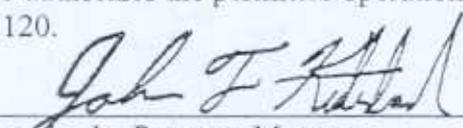
**Location:** Kenai Plant, Nikiski (Kenai), Alaska, Township 7 North, Range 12 West,  
Section 21, Seward Meridian, Mile 21 Kenai Spur Highway

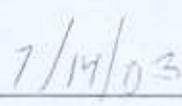
**Facility Contact:** Steve C. Maltby (907) 776-3150

This permit allows for the installation and operation of the Co-Generation Plant Project, as provided by AS 46.14.120. The project consists of a relocated turbine and startup engine, a heat recovery steam generator (HRSG), and the change in operation of existing sources. Under 18 AAC 50.305(a)(4), the permittee requested limits to avoid project classification as a PSD significant modification. The project consists of only the following air pollution emitting sources and controls:

1. One GE Frame 6B Turbine;
2. One Detroit Diesel startup engine;
3. One Heat Recovery Steam Generator

In order to accommodate the project and reduce overall emissions, Agrium also proposes to adjust operations of existing equipment at the plant. The Department authorizes the permittee to modify the Kenai Plant in accordance with the terms and conditions of this permit, and as described in the original permit application and subsequent submittals listed in Exhibit A. This permit also authorizes the permittee operation of the plant within limits as provided by AS 46.14.120.

  
John F. Kuerbach., Program Manager  
Air Permits Program

  
Date

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## PERMIT TERMS AND CONDITIONS

### A. Permit Continuity 18 AAC 50.340(i)

Except as revised or rescinded herein, or as superseded by an Air Quality Permit issued under AS 46.14.170, the Permittee shall comply with terms and conditions of Air Quality Control Permit to Operate No. 9423-AA011, as revised January 16, 1997.

2. If permit terms and conditions listed in this permit conflict with those of Permit No. 9423-AA011, the Permittee shall comply with terms and conditions listed herein.

### B. Standard Permit Conditions

3. The Permittee shall comply with each permit term and condition; noncompliance constitutes a violation of AS 46.14, 18 AAC 50, and the Clean Air Act and is grounds for:
  - 3.1 An enforcement action;
  - 3.2 Permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
  - 3.3 Denial of an operating permit application.
4. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
5. Each permit term or condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit;
6. Compliance with the permit terms and conditions is considered to be compliance with those requirements that are:
  - 6.1. Included and specifically identified in the permit; or
  - 6.2. Determined in writing in the permit to be inapplicable.
7. The permit may be modified, reopened, revoked and reissued, or terminated for cause; a request by the permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
8. The permit does not convey any property rights of any sort, nor any exclusive privilege.
9. The Permittee shall allow an officer or employee of the Department, or an inspector authorized by the Department, upon presentation of credentials and at reasonable times, with the consent of the owner or operator, to:
  - 9.1 Enter upon the premises where a source subject to the construction permit is located or where records required by the permit are kept;
  - 9.2 Have access to and copy any records required by the permit;
  - 9.3 Inspect any facilities, equipment, practices, or operations regulated by or referenced in the permit; and

- 9.4. Sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.
10. The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit, or to determine compliance with the permit. Upon request, the permittee shall furnish to the Department copies of records required to be kept; the Department, in its discretion, will require the permittee to furnish copies of those records directly to the federal administrator.
11. The Permittee shall certify all reports, compliance certifications, or other documents submitted to the Department under this permit as required by 18 AAC 50.205.

### **C. Record Keeping, Reporting, and Testing Conditions**

12. Except as provided for in Condition 16, submit three copies of any test plan, analytical protocol, quality assurance procedure, report, certification, and notice required under this permit, and permit No. 9423-AA011 to the Department's Air Quality Maintenance Section, 610 University Avenue, Fairbanks, AK 99709; telephone (907) 451-2106; facsimile (907) 451-2187.
13. Keep records of required monitoring data and support documentation for at least five years after the date of the collection. Support documentation includes calibration and maintenance records, sample analytical data (multi-media), original strip-chart recordings for continuous monitoring instrumentation, and copies of reports required by this permit. Keep monitoring and compliance records as required by the Clean Air Act and applicable federal air quality regulations.
4. If requested by the Department, conduct source sampling of unit exhausts and report the results as described in Appendix A of 40 CFR Part 60 and Part 63, effective July 1, 1997. The Permittee may propose alternative test methods if it can be shown to have equivalent accuracy, and will ensure compliance with the applicable standards or limits. Alternative test procedures must obtain the Department's approval before the test date. The Permittee shall comply with all applicable federal requirements, and shall:
- 14.1. Use the applicable test methods set out in 40 C.F.R. Part 60, Appendix A, effective July 1, 1997, and 40 CFR Part 61, Appendix B, effective December 19, 1996, to ascertain compliance with applicable standards and permit requirements;
- 14.2. Conduct source tests of unit exhausts and report the results as described. The Permittee may propose alternative test methods if it can be shown to be of equivalent accuracy, and will ensure compliance with the applicable standards or limits. Alternative test procedures must be approved by the Department prior to the test date.
- 4.2 Nitrogen oxides, NO<sub>x</sub>, expressed as NO<sub>2</sub> (ppm, lb/MMBtu, and lbs/hr):  
Reference Method 7E or Method 20 specified in 40 CFR, Part 60, Appendix A.
- 14.2.2. Oxygen, O<sub>2</sub> (percent): Reference Method 3 or 3A as specified in 40 CFR, Part 60, Appendix A.

- 14.2.3. Stack velocity and volumetric flow rate: Reference Methods 1-4 as specified in 40 CFR, Part 60, Appendix A.
- 14.2.4. Particulate matter (grains/dscf, lb/MMBtu, and lb/hr): Reference Method 5 as specified in 40 CFR, Part 60, Appendix A.
- 14.2.5. Sulfur dioxide, SO<sub>2</sub> (ppm, lb/MMBtu, and lbs/hr): Reference Method 6 or 6C as specified in 40 CFR, Part 60, Appendix A.
- 14.2.6. Carbon monoxide, CO (ppm, lb/MMBtu, and lb/hr): Reference Method 10 as specified in 40 CFR, Part 60, Appendix A.
- 14.3. Submit to the Department, within 60 days after receiving a request, and at least 30 days before the scheduled date of the tests, a complete plan for conducting the source tests;
- 14.4. Give the Department written notice of the tests 10 days before each series; and
- 14.5. Within 60 days after completion of the set of tests, submit the results, to the extent practical, in the format set out in Source Test Report Outline in Volume III, Section IV.3, of the State Air Quality Control Plan, adopted by reference in 18 AAC 50.030(8).
15. Conduct visible emissions Surveillance (Percent Opacity) in accordance with procedures set out in Reference Method 9 as specified in 40 CFR, Part 60, Appendix A, effective July 1, 1997. For emission units subject to only visible emission standards set out in 18 AAC 50.050(a) or 50.055(a), the permittee is not required to reduce observation data as set out in 40 CFR 60 Appendix A, Paragraph 2.5.
16. Install, calibrate, operate, and maintain air contaminant emissions and process monitoring equipment on the sources as described herein and in documents provided by the Permittee, listed in Exhibit C. Conduct applicable continuous monitoring system performance tests listed in 40 CFR 60, Appendix B, effective July 1, 1997, and certify test results. Submit monitoring equipment siting, operation, maintenance plans, and procedures for approval by the Department.

For continuous emission monitoring systems, comply with each applicable monitoring system requirement, as listed in 40 CFR 60.13, 60.19, 40 CFR 60, Appendix A, Method 19, Appendix B, Performance Specifications 2 and 6, and Appendix F, and the *EPA Quality Assurance Handbook For Air Pollution Measurements*, EPA/600 R-94/038b, effective July 1, 1997. Attach to the Facility Operating Report required by Condition H.25 and Exhibit D of Permit No. 9423-AA011: 1) a copy of each quarterly continuous emission monitoring system data assessment report for Quality Assurance Procedures conducted in accordance with 40 CFR 60, Appendix F; and 2) a copy of each quarterly monitoring systems performance report in accordance with 40 CFR 60.7.
17. The Permittee may seek Department approval of alternatives to the monitoring, record keeping, and reporting requirements of this permit by submitting a written request to the Department. Until such time as the Department approves an alternative of a monitoring, record keeping, or reporting requirement, the Permittee shall comply with the requirements listed in this permit.

## 8 Excess Emissions and Permit Deviation Reports.

18.1. Except as provided in Condition 38, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows

18.1.1. in accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report

18.1.1.1 emissions that present a potential threat to human health or safety; and

18.1.1.2. excess emissions that the Permittee believes to be unavoidable;

18.1.2. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;

18.1.3. report all other excess emissions and permit deviations

18.1.3.1. within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 18.1.3.2 and 18.1.3.3;

18.1.3.2. if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under Condition 18.1.3.1; and

18.1.3.3 for failure to monitor, as required in other applicable conditions of this permit.

18.2. When reporting excess emissions, the Permittee must report using either the Department's on-line form, which can be found at <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>, or if the Permittee prefers, the form contained in Exhibit D of this permit. The Permittee must provide all information called for by the form that is used.

18.3. When reporting a permit deviation, the Permittee must report using either the Department's on-line form, which can be found at <http://www.state.ak.us/dec/dawq/aqm/eeform.pdf>, or if the Permittee prefers, the form contained in Exhibit D of this permit. The Permittee must provide all information called for by the form.

18.4. If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

19. <Requirement Removed>

**D. Operating Condition**

20. The Permittee is authorized to install the following components at the Kenai Chemical-Urea Plant:

## 20.1. Co-Generation Plant

<u>Source #</u>	<u>Model</u>	<u>Heat Input/Size</u>	<u>Installation Date</u>
GGT-1746	MS6001B (Frame 6) General Electric Heavy Duty Gas Turbine, Serial No. TN 282612	437.1 mmBTU/hr/39 MW	2000
GSE-1746	Detroit Diesel Engine	650 HP	2000
B-707	Heat Recovery Steam Generator	471 mmBTU/hr (HHV)	2000

## 20.2. Modified Sources

<u>Source #</u>	<u>Model</u>	<u>Design Capacity</u>	<u>Installation Date</u>
GC-401A	Clark CO2 Compressor	5.2 mm BTU/hr	1968
GC-401B	Clark CO2 Compressor	5.2 mm BTU/hr	1968
GC-401C	Clark CO2 Compressor	5.2 mm BTU/hr	1981
GGT-744A	Solar Turbine	37.5 mm BTU/hr	1977
GGT-744B	Solar Turbine	37.5 mm BTU/hr	1977
GGT-744C	Solar Turbine	37.5 mm BTU/hr	1977
GGT-744D	Solar Turbine	37.5 mm BTU/hr	1977
GGT-744E	Solar Turbine	37.5 mm BTU/hr	1977

## 20.3. Sources Subject to Owner Requested Limits

<u>Source #</u>	<u>Model</u>	<u>Design Capacity</u>	<u>Installation Date</u>
B-705A	Waste Heat Boiler	50 mm BTU/hr	1986
B-705B	Waste Heat Boiler	50 mm BTU/hr	1986
B-705C	Waste Heat Boiler	50 mm BTU/hr	1986
B-705D	Waste Heat Boiler	50 mm BTU/hr	1986
B-705E	Waste Heat Boiler	50 mm BTU/hr	1986
B-600A	Package Boiler	156.0 mm BTU/hr	1968
B-600B	Package Boiler	156.0 mm BTU/hr	1968
B-600C	Package Boiler	183.0 mm BTU/hr	1968
B-700A	Package Boiler	230.0 mm BTU/hr	1977
B-700B	Package Boiler	230.0 mm BTU/hr	1977

## 20.4. Sources Removed from Service

<u>Source #</u>	<u>Model</u>	<u>Design Capacity</u>	<u>Installation Date</u>
GG-644A	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644B	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644C	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644D	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644E	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644F	IC engine-1365 kw	15.3 mm BTU/hr	1968
GG-644G	IC engine-1365 kw	15.3 mm BTU/hr	1968

- 21 Revise the Standard Operating Procedures for the Kenai Plant to include the Co-Generation Plant sources listed in Condition 20.1. Maintain and follow the standard operating procedure program for the Co-Generation Plant and its components listed in Condition 20.1 of this permit. Locate the standard operating procedures at the facility so that the procedures are available to the operators of the system and to any authorized representative of the Department.
- 22 Install, maintain, and operate, in accordance with standard operating procedures, all process equipment, instrumentation, testing and monitoring devices or instruments, emission controls, and alarms to ensure control of contaminants during the lifetime of the project.
- 22.1. <Requirement removed.>
- 22.2. Maintain and operate the monitoring system as set out in the CEMP. Record the date, time, HC and CO emission concentration, the steam production rate from B707, and the turbine power production rate for each sampling interval.
- 22.3. Attach to the Facility Operating Report required by Condition H.25 and Exhibit D of Permit No. 9423-AA011: The date and time of HC and CO sampling, the boiler steam production rate, the turbine power production rate, and average HC and CO emission concentration.
23. Permit on File--Permittee shall keep a copy of this permit, the State Air Quality Control Regulations 18 AAC 50, and Alaska Statutes 46.14, at the permitted facility.

**E. Owner Requested Limits to Avoid Classification under 18 AAC 50.305(a)(3)**

24. <Requirement removed.>
25. For all sources listed in Condition 20.1, except Detroit Diesel Source GSE-1746, use as fuel only natural gas. Use natural gas with an H<sub>2</sub>S concentration of no more than 40 ppm.
26. Burn no more than 2,000 gallons of fuel per 12-month period in the Detroit Diesel Source GSE-1746. Use fuel with a sulfur content of no more than 0.5 percent by weight.
27. Burn no greater than 3,250 mmscf of natural gas per 12-month period in all sources Boilers B600A-C, B700A-B.
28. Monitoring:
- 28 <Requirement removed.>

28.2. Monitor and record the natural gas fuel sulfur content as provided for in Condition 33.4.

28.3. Maintain records for the Detroit Diesel Source GSE-1746:

28.3.1. fuel purchase of No. 1 or No. 2 fuel oil;

28.3.2. For each shipment of fuel, test the fuel-oil sulfur content, and record the percent sulfur content by weight, using any appropriate method listed in ASTM D 396 (or later publications of the same listing); or

28.3.3. For each shipment of fuel, obtain the fuel oil analysis from the vendor.

28.4. Measure and record the total fuel gas consumption (mmscf) from Boilers B600A-C and B700A-B, and fuel gas consumption from each of GGT-1746 and B-707 each month.

28.5. Measure and record the total fuel oil consumption (gallons) from Source GSE-1746 each month.

## 29. Reporting

29.1. <Requirement removed.>

29.2. Attach to the Facility Operating Report required by Condition H.25 and Exhibit D of Permit No. 9423-AA-011:

29.2.1. The monthly total fuel gas consumption and 12-month rolling average fuel consumption for boilers B600A-C and B700A-B, and each of Sources GGT-1746 and B-707;

29.2.2. The monthly fuel oil consumption and 12-month rolling average fuel consumption from the 650 HP Detroit Diesel Engine;

29.2.3. The measured H<sub>2</sub>S content of each fuel gas analysis.

29.2.4. Fuel oil type of each fuel oil shipment for Source GSE-1746 and fuel sulfur content if required by Condition 28.3.2-3.

## F. 18 AAC 50.040: Federal Standards Adopted by Reference

Comply with the requirements of 40 CFR 60, New Source Performance Standards (NSPS) as they apply to affected facilities specified below.

Submit a copy of all NSPS reporting to the U.S. EPA Region 10 and the Department, as required by the applicable Federal standards. The Permittee may attach periodic federal reporting to the Facility Operating Report required by Condition H.25 and Exhibit D of Permit No. 9423-AA011.

Notify the Department of any U.S. Environmental Protection Agency- (EPA) granted waivers of NSPS emission standards, record keeping, monitoring, performance testing, or reporting requirements within 30 days after the Permittee receives a waiver.

If the permit terms in Section F conflict with Federal Standards adopted by reference in 18 AAC 50.040, comply with the Federal Standards.

30. 40 CFR 60, Subpart A, GE Turbine Source GGT-1746 and Heat Recovery Steam Generator Source B707;
  - 30.1. In accordance with 40 CFR 60, Subpart A and 18 AAC 50.040, for each construction, modification, or reconstruction of affected facilities regulated under 40 CFR 60:
  - 30.2. Notify the Department and EPA
    - 30.2.1. No later than 30 days after construction/reconstruction commencement in accordance with 40 CFR 60.7(a)(1);
    - 30.2.2. No more than 60 days prior and no less than 30 days prior to initial start-up, as defined in 40 CFR 60.2 (setting into operation of any affected facility for any purpose) in accordance with 40 CFR 60.7(a)(2);
    - 30.2.3. No more than 15 days after start-up in accordance with 40 CFR 60.7(a)(3);
    - 30.2.4. 60 days prior or as soon as practicable before modifying facilities that would be subject to NSPS as set out in 40 CFR 60.7(a)(4);
    - 30.2.5. No less than 30 days prior to conducting a demonstration of continuous monitoring system performance as set out in 40 CFR 60.7(a)(5);
    - 30.2.6. No less than 30 days prior to the anticipated date for conducting opacity observations or using a continuous opacity monitoring system required by 60.11(e)(1), as set out in 40 CFR 60.7(a)(6) and (7).
    - 30.2.7. No less than 60 days prior to commencement of reconstruction or replacement of a facility, as defined in 40 CFR 60, notify the Department and EPA with information as set out in 40 CFR 60.14(d).
  - 30.3. For affected facilities regulated under 40 CFR 60, maintain records of occurrence and duration of start-up, shut-down, or malfunction of an affected facility, control equipment, or monitoring equipment as set out in 40 CFR 60.7(b). Submit continuous monitoring system performance reports as set out in 40 CFR 60.7(c) and (d). Maintain a file of measurements as set out in 40 CFR 60.7(e).
  - 30.4. For affected facilities regulated under 40 CFR 60, sixty days after achieving maximum production rate, but not later than 180 days after initial startup, and upon the EPA Administrator's request, under Section 114 of the Clean Air Act, conduct performance tests as follows:
    - 30.4.1. Notify the Department and EPA at least 30 days in advance of any performance test and opacity observation as set out in 40 CFR 60.8(d), 60.11(e)(1), and Condition 14;
    - 30.4.2. Conduct performance tests and data reduction as set out in 40 CFR 60.8(b) and (f);
    - 30.4.3. Provide the Department copies of EPA administrator approvals for alternative performance testing; and
    - 30.4.4. Provide sampling ports and platform(s), safe access to platforms(s), utilities, and conduct testing as set out under 40 CFR 60.8(c)(and (e)).

- 30.4.5. Furnish the Department and EPA a copy of the performance test and opacity observations as set out in 40 CFR 60.8(a) and 60.11(e)(2)-(5).
- 30.5. At all times maintain and operate each affected facility including pollution control equipment, as set out in 40 CFR 60.11(d).
- 30.6. The permittee is prohibited from concealing a violation of any applicable NSPS standard as set out in 40 CFR 60.12.
- 30.7. For continuous monitoring systems and devices required under NSPS:
- 30.7.1. Except for NO<sub>x</sub> monitoring for the Heat Recovery Steam Generator, ensure all systems and devices are installed, calibrated, and operational as set out in 40 CFR 60.13(b) prior to conducting a performance test under 40 CFR 60.8;
- 30.7.2. <Requirement removed.>
- 30.7.3. <Requirement removed.>
- 30.7.4. Ensure all continuous monitoring systems meet the minimum frequency of operation requirements set out in 40 CFR 60.13(e), and are kept in continuous operation, except for system breakdowns, repairs, calibration checks, and zero/span adjustments;
- 30.7.5. Install continuous monitoring systems to obtain representative emission or process parameters, as set out in 40 CFR 60.13(f);
- 30.7.6. Reduce continuous monitoring system data as set out in 40 CFR 60.13(h); and
- 30.7.7. Provide the Department a copy of each EPA alternative monitoring approval or relative accuracy test audit approval issued under 40 CFR 60.13(i) or (j).
- 31 <Requirement removed.>
32. 40 CFR 60, Subpart Db; HSRG Unit B-707
- 32.1. Applicability and delegation of authority, 40 CFR 60.40b. An affected source is each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity of greater than 100 mm BTU/hr.
- 32.2. Standard for nitrogen oxides, 40 CFR 60.44b. Comply with the nitrogen oxide (NO<sub>x</sub>) new source performance emission limit of 0.20 lb/mm BTU heat input. (40 CFR 60.44b(a)(4)(i))
- 32.2.1. The NO<sub>x</sub> standards listed in 40 CFR 60.44b(a)(4)(i) applies at all times including startup, shutdown, or malfunction. (40 CFR 60.44b(h))
- 32.2.2. Except as provided for in 40 CFR 60.44b(j), determine compliance with the NO<sub>x</sub> standard on a 30-day rolling average basis. (40 CFR 60.44b(i))
- 32.3. Compliance and performance test methods and procedures for nitrogen oxides, 40 CFR 60.46b.
- 32.3.1. Based on U.S. Environmental Protection Agency Region 10, May 10, 1999 CEMS monitoring waiver, 40 CFR 60.46b(e) is not applicable.

- 32.3.2. Determine compliance with NO<sub>x</sub> emission limit based on performance testing for duct burners, using Method 20 upstream (at the outlet of the turbine exhaust) and downstream (outlet) of the steam-generating unit. Calculate the emission rate by subtracting the emission rate at the outlet of the turbine exhaust from that measured at the outlet of the steam-generating unit. (40 CFR 60.46b(f)) Determine the emissions from the steam-generating unit as provided for in Section 2.8 of Method 19, 40 CFR 60, Appendix A. To assure compliance with NSPS Subpart GG for the turbine exhaust, include with reports, information as listed in 40 CFR 60.334(c), (c)(2) and (c)(4).
- 32.4. Emission monitoring for nitrogen oxides. Based on U.S. Environmental Protection Agency Region 10, May 10, 1999 CEMS monitoring waiver, section 40 CFR 60.48b is not applicable. Conduct periodic NO<sub>x</sub> performance tests of the steam-generating unit no less than once every twelve months, as set out in Conditions 14 and 32.3.2.
- 32.5. Reporting and recordkeeping requirements, 40 CFR 60.49b.
- 32.5.1. Include in the construction notification required under 40 CFR 60.7 and Condition 30.2, the information listed in 40 CFR 60.49b(a)(1) through (4) applicable to the steam-generating unit.
- 32.5.2. Submit the initial performance test data. (40 CFR 60.49b(b))
- 32.5.3. Record and maintain records of each fuel amount combusted during each 24-hour period. Calculate an annual capacity factor for each fuel for each calendar quarter. Determine the annual capacity factor on a 12-month rolling average basis with a new annual capacity factor being calculated at the end of each calendar month. (40 CFR 60.49b(d))
- 32.5.4. Based on U.S. Environmental Protection Agency Region 10 May 10, 1999 CEMS monitoring waiver, section 40 CFR 60.49b(g) and (i) are not applicable.
- 32.5.5. Submit excess emissions reports for any calendar quarter during which excess emissions occur. If no excess emissions occur during a calendar quarter, report with the semiannual report that no excess emissions occurred during the given semiannual reporting period. (40 CFR 60.49b(h))
- 32.5.6. Maintain records required by 40 CFR 60.49b for no less than two years following the date of the record. (40 CFR 60.49b(o))
- 32.5.7. Permittee may request to submit electronic quarterly reports required under 40 CFR 60.49b(h), (i), (j), (k), or (l) in lieu of written reports. Coordinate the form of submittal with the permitting authority prior to exercising this option.
33. 40 CFR 60, Subpart GG; Turbine unit GGT-1746—GE MS5001B Turbine.
- 33.1. Applicability and designation of affected facilities, 40 CFR 60.330. Affected sources are stationary gas turbines with a heat input at peak load equal to or greater than 10.7 gigajoules per hour (10.1 MMBtu/hr) based on lower heating value as described in 40 CFR 60.330(a) and (b).

- 33.2. Standard for nitrogen oxides, 40 CFR 60.332(a)(1). Comply with the NO<sub>x</sub> emission limitation as listed in 40 CFR 60.332(a)(1). The limit is  $STD = 0.0075(14.4)/Y + F$ ; where STD is the allowable NO<sub>x</sub> emissions (percent by volume) at 15% O<sub>2</sub>, Y is the manufacturer's rated heat rate (kilojoules per watt hour), and F is the emission allowance for fuel-bound nitrogen.
- 33.3. Standard for sulfur dioxide, 40 CFR 60.333. Comply with the sulfur dioxide new source performance limitation listed in 40 CFR 60.333(a) or (b) of 150 ppm exhaust concentration or 0.8% fuel sulfur content by weight, respectively. Comply with these requirements by burning natural gas with a hydrogen sulfide content no greater than 40 ppm.
- 33.4. Monitoring of operations, 40 CFR 60.334:
- 33.4.1. Install and operate a continuous monitoring system that is accurate within five percent for recording fuel consumption and water injection rate in accordance with 40 C.F.R. 60.334(a).
- 33.4.2. Comply with 40 CFR 60.334(b) to monitor the nitrogen and sulfur content of the fuel gas. Record fuel gas sulfur content or develop a custom schedule to test fuel as specified in 40 C.F.R. 60.334(b)(2). Include with reports submitted under 40 CFR 60.7(c), information as listed in 40 CFR 60.334(c)(1), (c)(2) and (c)(4). Keep a copy of each U.S. EPA-issued monitoring waiver or custom monitoring schedule with the permit at the facility.
- 33.5. Test methods and procedures, 40 CFR 60.335.
- 33.5.1. Conduct performance tests once every twelve months in accordance with Conditions 14, 32.3.2, and 32.4 as required in 40 CFR 60.335(b) and (c), or alternative test methods in accordance with 40 CFR 60.335(f).
- 33.5.2. Determine compliance with the sulfur content standard using methodology as described in 40 CFR 60.335(d).
- 33.5.3. The permittee may propose an alternative to the reference methods in accordance with 40 CFR 60.335(f)(1). Keep a copy of each U.S. EPA-issued alternative monitoring method with the permit at the facility.

#### **G. 18 AAC 50.055: Industrial Processes and Fuel-Burning Equipment**

34. Comply with 18 AAC 50.055(a)(1) (Visible Emissions) and 18 AAC 50.055(b)(1) (Particulate Matter) as follows:
- 34.1. **Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from the sources listed in Condition 20.1 to reduce visibility through the exhaust effluent by any of the following:
- 34.1.1. more than 20 percent for a total of more than three minutes in any one hour<sup>1</sup>;
- 34.1.2. more than 20 percent averaged over any six consecutive minutes<sup>2</sup>.

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<sup>1</sup> For purposes of this permit, the "more than three minutes in any one hour" criterion in this condition and condition A.34.1.1 will no longer be effective when the Air Quality Control (18 AAC 50) regulation package effective 5/3/02 is adopted by the U.S. EPA.

- 34.2. **Particulate Matter.** The Permittee shall not cause or allow particulate matter emitted from the sources listed in Condition 20.1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
35. **Sulfur Compound Emissions.** Comply with 18 AAC 50.055(c) by burning natural gas fuel with a hydrogen sulfide concentration not to exceed 40 ppmv within units listed in Condition 20.1 (except GSE 1746). The standard states that sulfur compound emissions, expressed as sulfur dioxide, may not exceed 500 ppm averaged over a period of three hours.
36. Monitoring and recording:
- 36.1. Upon Department request, conduct a particulate matter emission test or sulfur dioxide emission test in accordance with Condition 14.
- 36.2. Conduct visible emission surveillance in accordance with Condition 15:
- 36.2.1. On the heat recovery steam generating unit Source B-707 exhaust during the initial performance test and upon Department request. Reduce data as set out in 40 CFR 60, Appendix A, Method 9 to compare with the applicable NSPS Opacity limits listed in Condition 31.3.
- 36.2.2. On the Diesel Source GSE-1746 no less than once every 12 months or when it is next operated if it is not operated within a 12 month time frame.
- 36.3. Monitor fuel sulfur content:
- 36.3.1. For Source GTE-1746 and B-707 based upon methods and schedule set out in Condition 33.4 and 33.5
- 36.3.2. For Source GSE-1746 as set out in Condition No. 28.3.
37. Reporting--The Permittee shall:
- 37.1. Attach to the Facility Operating Report—Condition H.25 and Exhibit D of Air Quality Permit No. 9423-AA011:
- 37.1.1. A copy of visible emission surveillance results for surveillance conducted during the reporting period of the emission units listed in Condition 20.1.
- 37.1.2. The results of each natural gas H<sub>2</sub>S analysis for the combustion turbine and heat recovery steam generator as set out in Condition 29.2.3; and
- 37.1.3. The results of each fuel oil sulfur analysis as set out in Condition 29.2.4.
- 37.2. Submit to the Department emission source test results in accordance with Condition 14.

## H. Air Pollution Prohibited.

- 38 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.

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<sup>2</sup> The six-minute average standard is enforceable only by the state until 18 AAC 50.055(a)(1), dated May 3, 2002, is approved by EPA into the SIP at which time this standard becomes federally enforceable.

- 38.1. If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 18.
- 38.2. As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 38.
- 38.3. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
- 38.3.1. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the facility have caused or are causing a violation of Condition 38; or
- 38.3.2. the Department notifies the Permittee that it has found a violation of Condition 38.
- 38.4. The Permittee shall keep records of
- 38.4.1. the date, time, and nature of all emissions complaints received;
- 38.4.2. the name of the person or persons that complained, if known;
- 38.4.3. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 38; and
- 38.4.4. any corrective actions taken or planned for complaints attributable to emissions from the facility.
- 38.5. With each facility operating report under Condition H.25 and Exhibit D of Air Quality Permit No. 9423-AA011, the Permittee shall include a brief summary report which must include
- 38.5.1. the number of complaints received;
- 38.5.2. the number of times the Permittee or the Department found corrective action necessary;
- 38.5.3. the number of times action was taken on a complaint within 24 hours; and
- 38.5.4. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.
- 38.6. The Permittee shall notify the Department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

**I. <Requirement removed.>**

**EXHIBIT A - FACILITY OPERATING REPORT ATTACHMENTS**

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Submit the Facility Operating Report required under Condition H.25 and Exhibit D of Permit No. 9423-AA001 to the Department's Fairbanks Office as set out in Condition 12. Unless transmitted under a separate cover to the Department, the Permittee shall attach or include reports to the Facility Operating Report as set out in the Conditions cited below:

1. <Requirement removed.>
2. Condition 19.1.2 — Excess emission report certifications in accordance with 18 AAC 50.205 per Consent Decree, Case No. A97397CIV.
3. Condition 22.3—Results of periodic CO and HC emissions from the Co-generation Project emission sources.
4. Conditions 29.2, 37.1.2, and 37.1.3 — Monthly total fuel consumption and 12-month rolling average fuel consumption, H<sub>2</sub>S content, and fuel oil sulfur analysis/records.
5. Condition 30.3—Attach Continuous Monitoring System performance reports.
6. Section F, Condition 32.5.3, 32.5.5, and 32.5.7—Attach copies of periodic reporting required by Federal New Source Performance Standards for source B-707.
7. Condition 37.1.1 – Attach a copy of each Visible Emission surveillance conducted during the quarter.
8. Condition 38.1.1 – the written description of any public complaint.

Certify the Facility Operating Report in accordance with Condition 11

**EXHIBIT B - SUBMITTAL LIST**

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- Certify and submit all notifications in accordance with Condition 11.
2. Condition 14.1, 14.2, 14.3, 14.4, 14.5, 30.4.1, 30.4.5, and 37.2--Submit a complete plan, a written notice, and an emission source test report for performance testing.
  3. Condition 16--Submit Monitoring Equipment siting, operation, maintenance plans, and procedures for contaminant and process monitoring.
  4. Condition 17—Submit written requests for alternative monitoring, record keeping, and reporting.
  5. Condition 19. Submit written notice of excess emissions and deviations from permit requirements.
  6. <Requirement Removed>  
Condition 30.2.1 through 30.2.7, 32.5.1, and 33.4—Submit NSPS-affected facility notifications.
  8. Condition 30.7.7. Submit a copy of each alternative monitoring or relative accuracy test audit approval.
  9. Condition 38.1.3—Notify the Department of planned modification or replacement of system equipment that might result in increased potential air pollution.

**EXHIBIT C - PERMIT DOCUMENTATION**

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August 30, 1999	Letter from Denise Newbould, ANP, to Jim Baumgartner, ADEC regarding supplemental comments about SO <sub>2</sub> ambient impact modeling and transitional period for equipment.
August 26, 1999	Letter from Rachel Clark, Kenai Peninsula Borough (KPB), Planning Department to Jim Baumgartner, ADEC, regarding KPB concerns about SO <sub>2</sub> ambient impact modeling and proposing permit condition language.
August 16, 1999	Letter from Denise Newbould, ANP, to Jim Baumgartner, ADEC, regarding UNOCAL's comments on the preliminary permit decision documents.
June 8, 1999	E-mail from Denise Newbould, Alaska Nitrogen Products, LLC (ANP) to Jim Baumgartner, ADEC, regarding Source ID numbers.
May 10, 1999	Letter from Gil Haselberger, US EPA Region 10, to Denise Newbould, KFC, regarding CEMS waiver.
April 19, 1999	Letter from Denise Newbould, KFC, to Rebecca Smith, ADEC, submitting a copy of the GE Frame 6B turbine emission test.
March 16, 1999	Letter from Michelle Deitering, KFC, to Jim Baumgartner, ADEC, submitting additional information to complete the co-generation project application.
March 10, 1999	Letter from Stephen Long, B&W, to Michelle Deitering, KFC, regarding NO <sub>x</sub> emissions from the B&W package boilers at Unocal.
March 1, 1999	Letter from Jason Brown, Solar Turbines, to Denise Newbould, KFC, regarding turbine particulate matter emissions.
February 18, 1999	Letter from Denise Newbould, KFC, to Jim Baumgartner, ADEC, submitting additional information to complete the co-generation project application.
February , 1999	Memorandum from Ted Fuhrman, Aalborg, Inc., to Joe Pault, KFC, regarding NO <sub>x</sub> versus load from the Keystone Boiler.
February 9, 1999	Letter from Michelle Deitering, KFC, to Bill MacClarence, ADEC, notifying ADEC of the company name change.
January 5, 1999	Letter from Michelle Deitering, KFC, to Ray Nye, US EPA Region 10, submitting the final draft of the Unocal Combustion Efficiency Monitoring Program.
November 24, 1998	Letter from Denise Newbould, KFC, to Jim Baumgartner, ADEC, submitting the construction permit application and coastal project questionnaire for the Co-generation Project prepared by CH <sub>2</sub> M Hill.
June 8, 1998	Consent Decree for Case No. A97 397 CIV (JRS).
March 26, 2003	Letter from Michelle Grzybowski, Agrium, to Jim Baumgartner, ADEC, Subject: Application for Construction Permit Revisions, Permit No. 9923-AC004.

**EXHIBIT D – ADEC NOTIFICATION FORM**

**ADEC Notification Form**

Fax this form to: (907) 269-7508 Telephone: (907) 269-8888

**Error! Reference source not found.**

Company Name

**Error! Reference source not found.**

Facility Name

**Reason for notification:**

**Excess Emissions**

*If you checked this box  
Fill out section 1*

**Other Deviation from Permit Condition**

*If you checked this box  
fill out section 2*

When did you discover the Excess Emissions or Other Deviation

Date: \_\_/\_\_/\_\_ Time: \_\_:\_\_

**Section 1. Excess Emissions**

(a) **Event Information** (Use 24-hour clock):

	START Time: (hr:min):	END Time:	Duration
Date: _____	_____	_____	_____
Date: _____	_____	_____	_____
<b>Total:</b>			_____

(b) **Cause of Event** (Check all that apply):

- START UP
- UPSET CONDITION
- CONTROL EQUIPMENT
- SHUT DOWN
- SCHEDULED MAINTENANCE
- OTHER \_\_\_\_\_

*Attach a detailed description of what happened, including the parameters or operating conditions exceeded.*

(c) **Sources Involved:**

*Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.*

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____

(d) **Emission Limit Potentially Exceeded**

*Identify each emission standard potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Identify what observation or data prompted this report. Attach additional sheets as necessary.*

Permit Condition	Limit	Emissions Observed
_____	_____	_____
_____	_____	_____

(e) **Excess Emission Reduction:**

*Attach a description of the measures taken to minimize and/or control emissions during the event.*

(f) **Corrective Actions:**

Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.

**(g) Unavoidable Emissions:**

Do you intend to assert that these excess emissions were unavoidable?

YES       NO

Do you intend to assert the affirmative defense of 18 AAC 50.235?

YES       NO

**Section 2. Other Permit Deviations**

**(a) Sources Involved:**

Identify each emission source involved in the event, using the same identification number and name as in the permit. List any control device or monitoring system affected by the event. Attach additional sheets as necessary.

Source ID No.	Source Name	Description	Control Device
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

**(b) Permit Condition Deviation:**

Identify each permit condition deviation or potential deviation. Attach additional sheets as necessary.

Permit Condition	Potential Deviation
_____	_____
_____	_____
_____	_____

**(c) Corrective Actions:**

Attach a description of actions taken to correct the deviation or potential deviation and to prevent recurrence.

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**TECHNICAL ANALYSIS REPORT**

Agrium U.S., Inc.  
Kenai Nitrogen Operations  
Co-Generation Project  
Revision 1

This report contains the technical and regulatory basis for Applicable Requirements under Alaska Air Quality Control Regulations 18 AAC 50

Final Decision Document

July 14, 2003

Prepared by Sally A. Ryan, P. E.

Alaska Department of Environmental Conservation  
Air Quality Maintenance Section  
Construction Permits  
410 Willoughby Avenue, Suite 105  
Juneau, AK 99801-1795

## **INTRODUCTION**

Agrium U.S., Inc., operates an ammonia and urea manufacturing plant located in Kenai, Alaska. The plant's most recent operating permit is Air Quality Control Permit-to-Operate No. 9423-AA011. A Title V permit application has been submitted and determined to be complete, and a Title V permit is pending. Therefore, the Kenai Plant presently operates under the shield created by submitting a complete operating permit application under AS 46.14.275.

The most recent construction permit is Construction Permit No. 9923-AC004. The Department of Environmental Conservation (ADEC) received a request to revise this construction permit dated March 26, 2003. The revisions include general housekeeping changes, deletion of one-time requirements that are now complete, and changes in permit conditions to reflect recent rulemaking.

The requested changes and ADEC's responses are listed in Appendix A. The final revision 1 to the permit reflects ADEC's responses as indicated in Appendix A.

ADEC has determined that the proposed modifications will not cause additional impacts to the coastal use or resource and therefore do not require a consistency review under Alaska Coastal Management Program provisions of 6 AAC 50.810.

## **FINAL DECISION**

ADEC has made a final decision to issue the construction permit under the authority of AS 46.14 and 18 AAC 50.

The terms and condition of the construction permit do not preclude any action by the state, EPA, or the Federal Land Manager to mitigate any material violation of the permit, or the mitigation of any secondary effect from the emissions of the facility.

**APPENDIX A**  
**ADEC Responses to March 26, 2003 Requested Changes**

<b>Condition Number</b>	<b>Requested Change</b>	<b>Response to Requested Change</b>	<b>Reason for Response</b>
Cover Page	Owner and Operator: Alaska Nitrogen Products, LLC	Acceptable.	Update facility information.
14.5	Allow 60 days to submit source test results.	Acceptable.	Conforms with 5/3/02 revisions to 18 AAC 50.345(o) – Construction and Operating Permits: Standard Permit Conditions.
18	Agrium requests that only the (800) 478-9300 number be listed.	Update conditions 18 and 19 on with the new (adopted 5/3/02) standard condition on excess emission reporting. Also update condition 38 with the new standard condition on Air Pollution Prohibited and include the new standard condition for ADEC's Notification Form as Exhibit D <sup>1</sup>	Continuity.
22.1	Remove.	Acceptable.	This condition has been satisfied (letter from Steve Maltby, Agrium, to Dan Meyer, EPA, dated 5/15/01). There are no further obligations incumbent on the permittee regarding this condition.
24 (including 24.1-3)	Remove.	Acceptable.	The Fairbanks Morse Generators have been decommissioned (ADEC Inspection Report dated 12/11/01, and letter from Steve Maltby, Agrium, to Tim Pilon, ADEC, dated 1/29/02). Additionally, reports demonstrate

<sup>1</sup> The new standard condition for excess emissions reporting includes cross-reference to the new standard conditions for Air Pollution Prohibited and the ADEC Notification form.

			that the 40 ton per year (tpy) threshold was not exceeded during the commissioning phase. The greatest increase was 7.6 tons per 12-month period.
25	Correct condition number to cross-reference condition 20.1 rather than condition 21.	Acceptable.	Typographical error.
28.1	Remove.	Acceptable.	Tim Pilon, ADEC, verified that this condition has been satisfied during an inspection conducted on 12/11/01. Completion of the requirements of this condition was again documented in a letter from Agrum to Tim Pilon, ADEC, dated 1/129/02. There are no further obligations incumbent on the permittee regarding this condition.
29.1	Remove.	Acceptable.	Decommissioning activities were completed on 12/31/01 so this condition has been satisfied (letter from Steve Maltby, Agrum, to Tim Pilon, ADEC, dated 1/29/02). There are no further obligations incumbent on the permittee regarding this condition.
30.7.2 and 30.7.3	Remove.	Acceptable.	Condition 31.5.1.1 states that no continuous emissions monitoring system (CEMS) is required if initial performance tests are less than 0.14 lb NO <sub>x</sub> /MMBtu. Results of initial tests indicate a maximum NO <sub>x</sub> rate of 0.12 lb/MMBtu (Source Test dated May 2001).
31 (including 31.1-6)	Remove.	Acceptable.	The New Source Performance Standards (NSPS) 40 C.F.R. 60, Subpart D provisions no longer apply to turbine duct burners, per revision October 2001. In 18 AAC 50.040(c). ADEC has incorporated by reference provisions of NSPS 40 C.F.R. 60, Subpart D as revised as of July 1, 2001. Therefore ADEC has not yet incorporated the revision to Subpart D.
34	Change to an average over any six consecutive	Update this condition to contain the old three-minute aggregate	ADEC's authority to enforce the Clean Air Act is based on the approved State Implementation Plan, which contains the

	minutes.	standard and the new six-minute average standard, as listed in new standard condition for visible emissions, and add footnote regarding the old standard sunset timeframe.	old three-minute standard. The new six-minute standard has been adopted by ADEC so it must also be included. However the old three-minute standard is still federally enforceable until EPA approves ADEC's new regulations.
39, 39.1, and 39.2	Remove.	Acceptable.	These conditions have been satisfied (letter from Jeff Anderson, ADEC, dated 3/20/01). Therefore they no longer apply.
Exhibit A – condition 1	Remove requirement for CEMS reporting.	Acceptable.	The Heat Recovery Steam Generator system does not require a CEMS.
Exhibit A – condition 3	Add language at the end, “per Consent Decree, case No. A97397CIV.”	Acceptable.	Clarity.
Exhibit A – condition 5	Remove.	Keep the condition as is, and add in the requirement for a continuous monitoring system (CMS) in accordance with 40 C.F.R. 60.334(a)	GGT-1746 was required to use water injection in Permit No. 8923-AA004 for the Alaska Electric Generating and Transmission Soldotna #1 substation, in order to meet the NSPS NO <sub>x</sub> limit (and BACT limit). Permit No. 8923-AA004 contained operational limits and water injection rates for natural gas- and distillate fuel-firing for the purpose of meeting the NSPS limit. The turbine was relocated to Agrium KNO in 1999 and is still is required to use water injection to meet NSPS NO <sub>x</sub> limit. The turbine is now prohibited from burning distillate fuel under condition 25. 40 C.F.R. 60.334(a) requires any turbine subject to Subpart GG and using water injection to meet the NO <sub>x</sub> limit must install and operate a CMS to monitor and record the ratio of water to fuel being fired in the turbine. For this reason, the continuous monitoring system performance reports are still necessary as required in Condition 30.3 and Exhibit A, condition 5.
Exhibit A –	Drop references to	Accept the change with the	ADEC has approved the removal of condition 31.

condition 7	conditions 31.5.4 and 32.5.7 and mention that this condition refers to source B-707.	exception that condition 32.5.7 be kept.	Therefore cross-references to it must be dropped. Keeping condition 32.5.7 provides an alternative reporting scenario. Reference to source B-707 adds clarity.
Exhibit B – condition 2	Replace with, “Condition 14.2, 14.3, 14.4, 14.5, 30.4.1, 30.4.5, and 37.2...”	Replace with, “Condition 14.1, 14.2, 14.3, 14.4, 14.5, 14.6, 30.4.1, 30.4.5, and 37.2...”	Correct typos.
Exhibit B – condition 6	Remove.	Acceptable.	Condition satisfied with no further obligations.