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From: MacClarence, Bill

To: Kuterbach, John; Stringham, Kathy

Sent: 3/23/02 9:20 PM

Subject: Air Quality Permit, BP Exploration (Alaska) Inc. Gathering Center 1

I submit the following comments for this permit:

1) Section 1 - Facility Name: All BP units within the Prudhoe Bay Facility are under common control, are interdependent, and share the same SIC code. In fact, the Statement of Basis stipulates that "Gathering Center 1 processes crude oil production fluids received from various crude oil accumulations located on the North Slope of Alaska, including (but not limited to) Well Pads D, E, F, G, Y, P, and various pads from Gathering Center 2 and 3 of the Western Operating Area." Thus, Gathering Center 1 should not be identified as the "facility," but rather as a unit of the Prudhoe Bay Facility

2) Section 2 - Facility Classifications: This should include 18 AAC 50.300(f) because the uncontrolled hazardous air pollutant (HAP) emissions from the three triethylene glycol (TEG) dehydrators would make the Gathering Center 1 unit a major HAPs facility with greater than 25 tons per year HAPs. Because there was no permit provision in place by December 31, 2000 (the EPA transition policy third extension) requiring maintenance of emission controls from the TEG dehydrators, the potential to emit must be based on uncontrolled emissions.

3) Section 2 - Operating Permit Classifications: This should include 18 AAC 50.325(b)(2) for the same reason as above. Additionally, since the Gathering Center 1 is simply a minor unit in the Prudhoe Bay Facility, combined HAPs potential emissions from the entire Prudhoe Bay Facility exceed 25 tons per year, even excluding the uncontrolled TEG dehydrator emissions.

4) Section 3 - Flare Rating/size: The flare rating size should include the maximum potential gas that could be flared, not simply pilot and purge gas. Gas flaring is not reported as an excess emission, and thus must be counted as potential to emit.

5) Section 4 - Potential to Emit: The listed value of 7482 tpy does not include potential VOC from the three TEG dehydrators. Additionally, there is a discrepancy in Table A of the Statement of Basis. The total PTE is listed as 7546 whereas the assessable PTE is listed as 7482. There is no discussion about the 64-tpy difference in these two numbers. Finally, if HAPs are aggregated for the entire Prudhoe Bay Facility, a large portion of HAPs will be assessable.

6) Section 5 and Section 12 - Particulate matter and visible emissions monitoring: In recently adopted regulations, the department has relaxed the monitoring protocol for visible and particulate matter emissions from those shown in this draft permit. Specifically, gas-fired source monitoring has been eliminated, and the particulate monitoring protocol design parameters of 21 inches and 12 percent opacity have been modified to 18 inches and 15 percent opacity. This is a violation of Section 504 of the Clean Air Act, because the modified protocol does not assure compliance with the particulate and visible emissions standards. These provisions in this draft permit should not be modified.

7) Section 5 - Use of emission factors for NOx, CO and particulate compliance monitoring: Using emission factors as the sole means of assuring compliance with allowable emissions for pollutant emissions for sources subject to these standards violates Section 504 of the Clean Air

Act. Source testing of these sources for these parameters must be required.

8) Section 5 - Periodic NOx monitoring for sources subject to federal NSPS for gas turbines: In recently adopted regulations, the department has relaxed the monitoring protocol for NOx monitoring. Specifically, the tiered approach has been abandoned. There is no justification for the abandonment of the monitoring protocol established in this draft permit. The majority of permits for gas turbines in other states support the tiered approach or more stringent monitoring. The tiered approach already included in several gas turbine permits requires biennial test if NOx emissions are measured at above 80 percent of the standard.

9) Section 12 - Flare Monitoring: There has been no demonstration of assured visible emission compliance with the use of knockout tanks. Even if this demonstration was forthcoming, and compliance could be assured when knockout tanks were "in service," the draft permit contains no definition for "out of service."

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