



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

AIR & RADIATION
DIVISION

September 29, 2020

Ms. Naomi Morton Knight, P.E.
Environmental Officer
Golden Valley Electric Association
PO Box 71249
Fairbanks, Alaska 99707-1249

Re: Alternative Test Dates for Boiler Subject to MATS Rule at Healy Power Plant

Dear Ms. Morton Knight:

This letter is a response to your letter on behalf of Golden Valley Electric Association submitted to the U. S. Environmental Protection Agency, Region 10, dated September 2, 2020. The letter requests minor changes to the test methods for sorbent trap mercury and hydrogen chloride testing for the coal-fired boiler identified in your permit with the Alaska Department of Environmental Conservation as emission unit ID number one (EU ID 1) required under 40 CFR part 63, subpart UUUUU: *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam generating Units* (the MATS Rule) that apply to the Healy Power Plant in Healy, Alaska. We are granting the modification requested as described in this letter.

Background

GVEA operates the Healy Power Plant, an electrical power generating facility in Healy, Alaska, that includes two coal-fired power boilers identified as EU ID 1 and EU ID 2 in its major source operating permit issued by ADEC (permit AQ0173TVP02). EU ID 1 is a 25-megawatt Foster-Wheeler pulverized coal-fired boiler. EU ID 1, installed in 1967, that meets the requirements of a *low emitting electric generating unit* for mercury and HCl under the MATS Rule. See 40 CFR 63.10005(h). EU ID 2, a 54-megawatt TRW Integrated Entrained Combustion System pulverized coal-fired boiler installed in 1996, does not meet the requirements of a LEE.

According to 40 CFR 63.10006(f)(1)(ii)(B), at least 320 calendar days, measured from the most recent test's end date, must separate annual sorbent trap mercury testing for 30-boiler operating day LEE tests. The previous annual sorbent trap mercury test for EU ID 1 was completed on January 21, 2020. Therefore, according to the MATS Rule, the next test may not commence until after December 6, 2020. However, GVEA is seeking approval to conduct testing during the third quarter of 2020 to better coordinate testing between the two units and to take advantage of more favorable weather conditions in Alaska. Specifically, GVEA requested approval to conduct annual sorbent trap testing for EU ID 1 required by the MATS Rule between August 17 and September 16, 2020. Because GVEA's request was dated September 2, 2020, after the beginning of GVEA's proposed testing period, and because the EPA

is acting on GVEA's request after the end of GVEA's proposed testing period, the EPA is considering GVEA's request as a request for the EPA approval to allow the annual sorbent trap mercury testing for 30-boiler operating day LEE tests that was conducted between August 17 and September 16, 2020 to meet the requirements of 40 CFR 63.10006(f)(1)(ii)(B).

GVEA is also requesting approval to conduct HCl LEE testing for EU ID 1, during the third quarter of 2020. HCl testing for EU ID 1 is required every three years and tests must be separated by at least 1,050 days. See 40 CFR 63.10006(f)(1)(iii). As GVEA completed the last HCl LEE test for EU ID 1 on November 29, 2017, the MATS Rule requires that the next test not occur until after October 14, 2020. GVEA is requesting the EPA's approval to allow an HCl LEE test on EU ID 1 conducted on August 12, 2020, to meet the requirements of 40 CFR 63.10006(f)(1)(iii).

Regulatory Basis

According to 40 CFR 63.7(e)(2)(i), "*performance tests shall be conducted and data shall be reduced in accordance with the test methods and procedures set forth in this section, in each relevant standard, and, if required, in applicable appendices of parts 51, 60, 61, and 63 of this chapter unless the Administrator specifies or approves, in specific cases, the use of a test method with minor changes in methodology.*"

ADEC has not requested delegation of the MATS Rule, so the EPA is the agency with authority to review minor changes to test methods.

Determination

In consultation with the EPA's Office of Air Quality Planning and Standards and Office of Enforcement and Compliance Assurance, we have determined that these changes meet the definition of a *minor change to test method* in 40 CFR 63.90(a) because reducing the duration between tests in this case does not decrease the stringency of the limit or standard, have no national significance, and are site-specific. GVEA is requesting a temporary increase in the frequency of testing to synchronize testing between two units and improve the safety of emissions testers visiting the interior of Alaska. Furthermore, approval of GVEA's requests would not result in changes to the analytical method or means of data reduction.

Specifically, GVEA is approved to do the following:

1. Rely on sorbent trap mercury testing for 30-boiler operating day LEE tests for EU ID 1 at the Healy Power Plant conducted between August 17 and September 16, 2020 (before 320 calendar days have elapsed since the previous test, which was completed on January 21, 2020), thus waiving the requirements of 40 CFR 63.10006(f)(1)(ii)(B).
2. Rely on HCl LEE testing for EU ID 1 at the Healy Power Plant conducted on August 12, 2020, (before 1,050 calendar days have elapsed since the previous test, which was completed on November 29, 2017), thus waiving the requirements of 40 CFR 63.10006(f)(1)(iii).
3. This approval is contingent on the testing conducted on EU ID1 between August 17 and September 16, 2020, (sorbent trap mercury testing for 30-boiler operating day) and on August 12, 2020, (HCl LEE testing) meeting all other requirements of the MATS Rule. It does not apply to EU ID 2 or any other equipment; it does not affect the maximum duration between any tests; nor does it affect any other applicable requirement that applies to EU ID 1.

4. After the current test cycle, the requirements of 40 CFR 63.10006(f)(1)(ii)(B) and (f)(1)(iii) shall resume.

If you have any questions regarding this letter, please contact Geoffrey Glass at (206) 553-1847 or at glass.geoffrey@epa.gov.

Sincerely,

Johansen,
Amy

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Johansen, Amy
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Amy Johansen, Chief
Air Permits and Toxics Branch

cc: Mr. James Plosay
ADEC

Mr. Moses Coss
ADEC