UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

DEC 30 2015

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. John Baldridge
Senior Director Pipeline Operations
Alyeska Pipeline Service Company
Post Office Box 60469
Fairbanks, Alaska 99706

Dear Mr. Baldridge:

I am writing in response to your letter dated October 20, 2015. In that letter, you request an alternative test method for a soon to be installed turbine, labeled in the facility's Title V permit as Emission Unit 25a (EU 25a), at Alyeska Pipeline Service Company's (Alyeska) Pump Station 1 located on the North Slope of Alaska near Prudhoe Bay.

According to the information you provided, this turbine is subject to 40 CFR Part 60, Subpart KKKK, or the Standards of Performance for Stationary Combustion Turbines (Subpart KKKK), which states in 40 CFR 60.4400(b)(6) "The ambient temperature must be greater than 0°F during the performance test." You state that this requirement is problematic because the average ambient temperature at Pump Station 1 is consistently below 0°F from early November through early April. Additionally, you state that once installed, EU 25a will be equipped with inlet air preheaters which, when in use, "will ensure the turbine combustion air temperature, which is drawn from outside the turbine module, is maintained above 0°F."

As a result of the requirement found in 40 CFR 60.4400(b)(6) that the ambient temperature must be greater than 0°F during the performance test, and the fact that EU 25a will be equipped with inlet air preheaters which will ensure that the turbine inlet air is maintained at a temperature above 0°F, you are requesting to be allowed to conduct the initial and subsequent performance tests required to be performed on EU 25a at any ambient temperature as long as the turbine inlet air temperature is maintained at a temperature greater than 0°F.

After reviewing the information provided, we approve your request to conduct the initial and future performance tests on EU 25a at Pump Station 1 at ambient temperatures below 0°F, provided that when the ambient temperatures is below 0°F, the facility must operate the inlet air preheaters on EU 25a so that the turbine inlet air temperature is maintained at a temperature greater than 0°F.

Since this alternative method could be applicable to other similar facilities subject to the requirement found in 40 CFR 60.4400(b)(6), we will be posting this letter on our website at http://www.epa.gov/ttn/emc/approalt.html so that after the date of this letter other interested parties may make use of this alternative method. If you have any questions regarding this determination, please contact Ms. Kim Garnett of my staff at 919-541-1158 or garnett.kim@epa.gov.

Sincerely,

Steffan M. Johnson, Leader
Measurement Technology Group

cc: Katharine Owens, USEPA, Region X (Owens.Katharine@epa.gov)
Moses Coss, Alaska DEC (moses.coss@alaska.gov)
Christian Fellner, EPA/OAQPS SPPD (Fellner.Christian@epa.gov)
Lula Melton, EPA/OAQPS/AQAD (Metlon.lula@epa.gov)
Kim Garnett, EPA/OAQPS/AQAD (garnett.kim@epa.gov)