UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAR 08 1983

Action Memorandum - Arco Alaska, Incorporated - PSD Permit Revision

Alexandra B. Smith, Director
Air and Waste Management Division, M/S 532

John R. Spencer
Regional Administrator, M/S 601

Background

Arco Alaska, Inc. has requested a revision to their December 29, 1981 PSD permit to install additional gas fired turbines and heaters at the Kuparuk oil field. To obviate the need for a PSD review for the proposed changes, the Company opted to demonstrate that a no net increase in emissions would result. At our request, the Company supplied an ambient impact evaluation demonstrating that the change in impacts due to the changes in location of the central production facilities and the changes in the turbine and heater sizes would not exceed the ambient levels resulting from the previously permitted emission limits.

Discussion

Our technical staff has reviewed the submitted information and concludes that the potential emissions are equal to or less than the emissions proposed in the original PSD permit application. The emission limitations stated in the Kuparuk PSD permit still apply to the proposed sources and represent BACT for the project.

It should be noted, however, that while there is a decrease in emissions which would normally tend to improve air quality, the change in the source locations from four central processing stations to three has resulted in a slight increase in particulate impacts. This is due to the decrease in the spatial separation of the central compressor stations and the existing point sources at those locations. Under certain conditions the combined impacts of these sources is slightly greater than was predicted in the original application. However, these small increases are less than EPA's Levels of Significant Ambient Impact, and can be considered insignificant. We therefore feel that it is not necessary to subject the permit modifications to the public participation procedures.

Recommendation

Because the first PSD permit application generated no public comment, it does not seem appropriate to re-open the public comment period for the proposed permit modifications. The staff recommendation is that you sign the letter to Mr. Ronsio.

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Final:Nye:kaf:3/8/83:#4128X,pl

CONCURRENCES

SYMBOL	RN				mcc			
SURNAME	NYE	JOHNSTON	GAULDING	FINDLEY	COYLE			
DATE	3/9/83	3/11/83	3/18	3/18	3/24			

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