UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

AUG 29 1997

Reply To
Attn Of: OAQ-107

Alison Cooke
BP Exploration (Alaska) Inc.
PO Box 196612
Anchorage, Alaska 99519-5111

Randy Poteet
ARCO Alaska, Inc.
PO Box 100360
Anchorage, Alaska 99510-0360

Re: Request for Administrative Revisions to PSD Permits for Prudhoe Bay Facilities; ARCO Alaska, Inc. and BP Exploration (Alaska), Inc.

Dear Mr. Poteet and Ms. Cooke:

ARCO Alaska Inc.(AAI)and BP Exploration (Alaska) Inc. (BPX)requested administrative revisions to four federally issued prevention of significant deterioration (PSD) permits: PSD-X79-05, PSD-X80-09, PSD-X81-01, and PSD-X81-13 issued between 1978 and 1981. AAI and BPX have requested (in preparation for their Alaska Department of Environmental Conservation (ADEC) Title V permits) administrative revisions to both short-term and ton per year emission limitations for the above mentioned PSD permits.

In response to our March 31, 1991 letter, the companies have provided the additional information in the August 23, 1997 submittal (in addition to the September 18, 1996 and March 4, 5, 14, and July 17, 1997 letters) needed to complete our review regarding the replacement of field-wide ton per year emission limits with new unit-specific emission limitations. Based on a review of that information, my staff concluded that the short-term emission limits and the unit-specific ton per year emission limits will result in an overall decrease in allowable emissions. Therefore, because this action is considered an administrative action, additional public participation requirements in accordance with the PSD regulations will not be required.

In order to implement the requested administrative changes, the four PSD permits have been modified to reflect those changes. All references to emission limitations in the current permits have been deleted and replaced with emissions limitations set out in the attachments to this letter. Accordingly, this letter hereby modifies the PSD permits as stipulated in Attachments 1 through 4. If you have any questions, please feel free to contact Raymond Nye of my staff at (206) 553-4226.

Sincerely,

for Anita Frankel, Director
Office of air Quality

cc: J. Stone, ADEC
J. Pavitt, AOO-A

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ATTACHMENT 1

Emission Limitations - PSD-X79-05

Facility	Equipment Tag Number	Manufacturer/ Model	NO_x		VOC lb/MMBtu	CO lb/MMBtu
			ppmv[1]	tons/year		
BP GC#2	GTRB-02-7000	GE/MS5352B	150 (14.4/Y)	1,115	0.002	0.17
BP GC#2	GTRB-02-7001	GE/MS5352B	150 (14.4/Y)	1,115	0.002	0.17

[1]Corrected to 15% O_2 Y= manufacturers rated heat rate at manufacturers rated peak load (kJ/W-hr).

ATTACHMENT 2

Emission Limitations - PSD-X80-09

Facility	Equipment Tag Number	Manufacturer/ Model	NO_x			CO		PM		Opacity
			ppmv[1]	lb/MMBtu	tons/year	lb/MMBtu	tons/year	lb/MMBtu	tons/year	
BP GC#1 Turbines	NGT-7000	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	NGT-7001	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	NGT-3204	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	0.014	16	10%
BP GC#2 Turbines	GTRB-02-7529	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%
	GTRB-02-7504A	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	0.014	2.0	10%
	GTRB-02-7504B	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	0.014	2.0	10%
	GTRB-02-7704A	Sulzer	150 (14.4/Y)		230	0.17	56	0.014	4.6	10%
Heaters	B-02-7000	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-02-7001	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-02-7002	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
BP GC#3 Turbines	GTRB-03-7000	GE/MS5352B	150(14.4/Y)		1,115	0.17	269	0.014	22	10%
	GTRB-03-7001	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	GTRB-03-7704A	Sulzer	150 (14.4/Y)		230	0.17	56	0.014	4.6	10%
Heaters	B-03-7000	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-03-7001	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-03-7002	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-03-7003	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
	B-03-7004	CB/200800		0.14	21	0.035	5.1	0.011	1.6	5%
AAI CCP Turbine	18-1813	GE/MS5371	none			none		0.014	22	10%

ATTACHMENT 2 (continued)

Facility	Equipment Tag Number	Manufacturer/ Model	NO_x			CO		PM		Opacity
			ppmv[1]	lb/MMBtu	tons/year	lb/MMBtu	tons/year	lb/MMBtu	tons/year	
AAI FS#1 Turbines	15-1803	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	15-1804	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	15-15107	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%
AAI FS#2 Turbines	16-1803	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	16-1804	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	16-15105	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%
	16-15106	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%
AAI FS#3 Turbines	14-1803	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	14-1804	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	0.014	22	10%
	14-1806	GE/MS5322R	150 (14.4/Y)		1,016	0.17	196	0.014	16	10%
	14-15105	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%
	14-15106	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	0.014	3.2	10%

[1]Corrected to 15% O_2 Y = manufacturers rated heat rate at manufacturers rated peak load (kJ/W-hr).

ATTACHMENT 3

Emission Limitations - PSD-X81-01

Facility	Equipment Tag Number	Manufacturer/ Model	NO_x			CO		Opacity
			ppmv[1]	lb/MMBtu	tons/year	lb/MMBtu	tons/year	
AAI SIPE Turbines	31-15101	RR/RB211-24A	150 (14.4/Y)		885	0.17	178	10%
	31-15102	RR/RB211-24A	150 (14.4/Y)		885	0.17	178	10%
	31-15301	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	10%
	31-15302	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	10%
	31-15303	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	10%
	31-15304	Ruston/TA2500	150 (14.4/Y)		86	0.17	24	10%
Heaters	31-1401	Broach		0.08	26	0.061	20	5%
	31-1402	Broach		0.08	26	0.061	20	5%
AAI STP Heaters	11-14401	Lummus		0.08	61	0.061	46	5%
	11-14402	Lummus		0.08	61	0.061	46	5%
	11-14403	Lummus		0.08	61	0.061	46	5%
	11-14404	Lummus		0.08	61	0.061	46	5%
	11-14405	Lummus		0.08	61	0.061	46	5%
	11-14406	Lummus		0.08	61	0.061	46	5%
BP GC#1/SIPW Turbines	GTRB-51-8002A	RR/RB211-24A	150 (14.4/Y)		283	0.17	57	10%
	GTRB-51-8002B	RR/RB211-24A	150 (14.4/Y)		283	0.17	57	10%

[1]Corrected to 15% O_2 Y = manufacturers rated heat rate at manufacturers rated peak load (kJ/W-hr).

ATTACHMENT 4

Emission Limitations - PSD-X81-13

Facility	Equipment Tag Number	Manufacturer/ Model	NO_x			CO		SO_2	PM	Opacity
			ppmv[1]	lb/MMBtu	tons/year	lb/MMBtu	tons/year	tons/year	tons/year	
BP GC#1/SIPW Turbines	GTRB-51-3304	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	5.0	16	10%
	GTRB-01-7704A	Sulzer/S3	150 (14.4/Y)		230	0.17	56	1.5	4.6	10%
	GTRB-01-7704B	Sulzer/S3	150 (14.4/Y)		230	0.17	56	1.5	4.6	10%
BP GC#2 Turbines	GTRB-W-3152	Solar/Mars	150 (14.4/Y)		400	0.17	84	2.2	6.9	10%
	GTRB-02-7704B	Sulzer/S3	150 (14.4/Y)		230	0.17	56	1.5	4.6	10%
BP GC#3 Turbine	GTRB-03-7704B	Sulzer/S3	150 (14.4/Y)		230	0.17	56	1.5	4.6	10%
AAI CGF Turbines	19-1801	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	6.5	16	10%
	19-1802	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	6.5	16	10%
	19-1805	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	6.5	16	10%
	19-1855	RR/RB211-24C	150 (14.4/Y)		999	0.17	193	6.5	16	10%
	19-1806	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	9.0	22	10%
	19-1856	GE/MS5352B	150 (14.4/Y)		1,115	0.17	269	9.0	22	10%
Heaters	19-1401	Chiyoda/Zink		0.08	84	0.061	64	5.4	12	none
	19-1402	Chiyoda/Zink		0.08	84	0.061	64	5.4	12	none
	19-1403	Chiyoda/Zink		0.08	84	0.061	64	5.4	12	none
AAI FS#2 Turbine	16-15133	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	1.2	3.2	10%
AAI FS#3 Turbines	14-15188	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	1.2	3.2	10%
	14-15189	Ruston/TB5000	150 (14.4/Y)		141	0.17	38	1.2	3.2	10%

[1]Corrected to 15% O_2 Y = manufacturers rated heat rate at manufacturers rated peak load (kJ/W-hr).