



**REGION 10**  
SEATTLE, WA 98101

April 25, 2024

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 (GVEA) submitted to the U. S. Environmental Protection Agency, Region 10, dated February 9, 2024. The letter requests minor changes to the test method for mercury 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 AQ0173TVP03). EU ID 1 is a 25-megawatt Foster-Wheeler pulverized coal-fired boiler. EU ID 1, installed in 1967, meets the requirements of a *low emitting electric generating unit* (LEE) for mercury 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. In accordance with EPA's previous approval for alternative test dates, issued on September 29, 2020, GVEA began mercury testing for EU ID 1 on July 30, 2023. Due to several unforeseen issues, including equipment failures that led to invalid traps, logistics with GVEA's remote location, and unscheduled plant outages, the previous annual sorbent trap mercury test for EU ID 1 was completed on January 5, 2024. Therefore, according to the MATS Rule, the next test may not commence until

after November 20, 2024. However, GVEA is seeking approval to conduct testing during the third quarter of 2024 to better coordinate testing between facilities 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 beginning on July 16, 2024. Testing is projected to be completed on August 15, 2024.

### **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.”*

The Alaska Department of Environmental Conservation (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 previous consultation with the EPA’s Office of Air Quality Planning and Standards and Office of Enforcement and Compliance Assurance, it has been 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 one-time increase in the frequency of testing to synchronize testing between facilities 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 July 16 and August 15, 2024 (before 320 calendar days have elapsed since the previous test, which was completed on January 5, 2024), thus waiving the requirements of 40 CFR 63.10006(f)(1)(ii)(B).
2. This approval is contingent on the sorbent trap mercury testing conducted on EU ID 1 between July 16 and August 15, 2024, 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.
3. 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 about this matter, please contact Ms. Valerie Gardner of my staff at (907) 271-6561 or gardner.valerie@epa.gov.

Sincerely,

DAVID BRAY  Digitally signed by DAVID  
BRAY  
Date: 2024.04.25  
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David Bray, Acting Branch Manager  
Air Permits, Toxics, Transportation,  
and Communities Branch  
Air and Radiation Division

cc: Mr. Jim Plosay  
Alaska Department of Environmental Conservation

Mr. Moses Coss  
Alaska Department of Environmental Conservation