



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

**Department of Environmental
Conservation**

DIVISION OF AIR QUALITY
Air Compliance Program

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May 22, 2024

Phillip Zavadil, City Manager
City of Saint Paul
St. Paul Power Plant
PO Box 901
St. Paul, AK 99660

Subject: Source Test Extension Request Approval for City of Saint Paul, Saint Paul Power Plant,
Operating Permit No. AQ0319TVP04

Dear Mr. Zavadil:

The Alaska Department of Environmental Conservation received a source test extension request from the City of Saint Paul (the Permittee), who initially contacted the Department on April 21, 2022. Operating Permit AQ0319TVP04 Condition 15 requires the Permittee to source test EU IDs 5, and EU ID 1 or 6 every 5 years. These source tests were due by June 7, 2022. The City of Saint Paul informed the Department that they would be unable to source test by the deadline due to several factors including overdue maintenance and significant financial hardship. Under 18 AAC 50.345(a) & (l), the Department granted the City of Saint Paul a source test extension until June 7, 2024. On March 21, 2024, the City of Saint Paul requested a second source test extension, with the request asking for an extended deadline till December 31, 2025.

The Department grants the City of Saint Paul a second source test extension until December 31, 2025. If the City of Saint Paul cannot conduct the required source tests by **December 31, 2025**, the Permittee shall submit a detailed explanation of the reason by **December 17, 2025**. If the source test can be conducted sooner, the City of Saint Paul shall provide the Department with an updated projected date for the source testing as soon as possible.

In accordance with Condition 50 of Permit AQ0319TVP04, at least ten days before conducting the source test, the City of St. Paul shall provide the Department written notice of the date and time the test will begin, as the Department may opt to send an observer. If the City of St. Paul intends to modify or deviate from the submitted test plan, written approval must be obtained from the Department prior to conducting the test. As set forth in 18 AAC 50.345(o), the final test results are due within 60 days of test completion. When submitting the final report, please be sure to include the responsible official's signature and certification as required by 18 AAC 50.205.

This letter does not waive any past or future violations under the above-referenced or other applicable Air Quality permit(s) or any rights of the Department or the State of Alaska under applicable law. If you have any questions, please contact Breanna Howard at 907-269-7685 or via email at breanna.howard@alaska.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Dylan B Morrison".

Dylan Morrison
Air Compliance Program Manager

cc: Chuck Hoyle, chuck.hoyle@steigers.com
Dylan Morrison, ADEC/ACP, Juneau
Samantha Hoover, ADEC/ACP, Anchorage
Nilima Hullavarad, ADEC/ACP, Fairbanks
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