

Consent Agenda Briefing for PWSRCAC Board of Directors – January 2024

ACTION ITEM

Sponsor: Sadie Blancaflor and the TOEM Committee

Project number and name or topic: 5570 – Valdez Air Quality

1. **Description of agenda item:** The Board is being asked to approve a contract with Ron Sahu to conduct work related to the Valdez Marine Terminal (VMT) Title V Air Quality Permit Review and associated work with tank venting estimates in an amount not to exceed \$50,000.

2. **Why is this item important to PWSRCAC:** Since its inception, PWSRCAC has had a continuing interest in the environmentally responsible operation of the VMT. Concerns related to the emission of air pollutants from operations at the VMT are consistent with PWSRCAC’s mission, as well as our mandates under OPA 90 and the contract with Alyeska. This project is necessary to ensure that PWSRCAC can provide technical advice and recommendations related to the VMT Title V air quality permit, as well as provide advice related to the operation and maintenance of facilities to help mitigate and eliminate sources of air pollution at the VMT which may pose adverse environmental and health impacts.

3. **Previous actions taken by the Board on this item:** None.

4. **Summary of policy, issues, support, or opposition:**

Tank Vent Damage Monitoring: PWSRCAC submitted two Public Records Requests on July 27, 2023, and August 31, 2023, requesting information related to the tank vent damage emissions. Included among the documents received was a letter detailing that the Alaska Department of Environmental Conservation issued a Notice of Violation to Alyeska on May 3, 2022, for three separate incidents, with two incidents carrying twelve counts of violation.

Air Quality: The VMT Title V Air Quality Permit was originally slated to be released for public comment on June 16, 2023, but as communicated to Council staff by ADEC Air Quality, that date has been delayed and no release date has been made available at this time. The Council transmitted a letter to ADEC and EPA in August 2023, requesting an updated timeline on when the Title V Air Quality Permit would be released for public comment, an update on the status of ADEC’s Notice of Violation Investigation regarding the tank vent damage upset, and any information on emissions estimates from the upset, if those estimates exist. On October 6, 2023, ADEC Air Quality responded to the Council’s letter, noting that no timeline was available for the release of the permit for public comment, and its release was contingent on Alyeska’s current appeal of EPA NESHAP-OLD provisions. ADEC confirmed the investigation into the tank vent damage incident was ongoing and no emission estimates are available at this time.

Preparations to on board an air quality contractor for tank vent damage emission estimates, Title V Air Quality permit preparation, and NESHAP-OLD provisions are ongoing, and Ron Sahu, PhD, was selected as the recommended contractor.

Contract Approval for Air Quality Monitoring at the VMT 3-1

5. **Committee Recommendation:** At their January 5, 2024 meeting, the Terminal Operations and Environmental Monitoring Committee recommended that the Board approve funding in an amount not to exceed \$50,000 for selected contractor, Ron Sahu, PhD, to conduct work related to the VMT Title V Air Quality Permit Review and associated air quality issues.

6. **Relationship to LRP and Budget:** Project 5570 – Valdez Air Quality would be added to the FY2024 budget in the amount of \$50,000, assuming that item 4-2 Approval of FY2025 Budget Modifications is approved by the Board on the January 25, 2024 agenda.

7. **Action Requested of the Board of Directors:** Authorize a contract with Ron Sahu, PhD, in an amount not to exceed \$50,000 to conduct work related to VMT Title V air quality permit review and associated air quality issues under project 5570 - Valdez Air Quality.

Note: This action is contingent upon Board approval of the budget modification for project 5570 - Air Quality, as included under item 4-2, for this work.

8. **Alternatives:** None.

9. **Attachments:** None.