



REGION 10

SEATTLE, WA 98101

May 21, 2026

Allison M. Hebard
Environmental Officer
Golden Valley Electric Association
P.O. Box 71249
Fairbanks, Alaska 99707

Dear Ms. Hebard:

This letter responds to Golden Valley Electric Association's March 3, 2026, correspondence submitted to the U.S. Environmental Protection Agency's Region 10 office. In its letter, GVEA requests an alternative test date for a coal-fired boiler at the Healy Power Plant in Healy, Alaska (identified as emission unit (EU) ID 1). This unit is subject to 40 CFR part 63, subpart UUUUU: National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units, also known as the Mercury and Air Toxics Standards. Based on the information provided in GVEA's letter, EPA is granting the alternative test date for EU ID 1.

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 from the Alaska Department of Environmental Conservation (permit AQ0173TVP03). According to the letter, "EU ID 1 is a Foster-Wheeler pulverized coal-fired boiler rated at approximately 28-megawatt gross output." EU ID 1, installed in 1967, fulfills the requirements of a *low emitting electric generating unit* for mercury under the MATS Rule (see 40 CFR 63.10005(h)). EU ID 2 is a 54-megawatt TRW Integrated Entrained Combustion System pulverized coal-fired boiler installed in 1996 and does not fulfill the requirements for LEE status.

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." According to GVEA, the previous annual sorbent trap mercury test for EU ID 1 concluded on October 27, 2025. In its letter, GVEA requests to begin annual testing for this unit on July 7, 2026, which is 253 days after the previous test's end date. However, GVEA is seeking approval to conduct this testing earlier than 320 days after the previous test's end date to better coordinate testing between facilities, given the remote location and to mitigate travel and work hazards for testing contractors, plant personnel, and regulatory observers given the weather at this facility.

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.”

Additionally, 40 CFR 63.90(a) defines a minor change in methodology as a “modification to federally required monitoring that...(iii) is site-specific, made to reflect or accommodate the operational characteristics, physical constraints, or safety concerns of an affected source...”

The ADEC has not requested delegation of the MATS Rule, so EPA is the authority to review minor changes to test methods.

Determination

EPA has determined that the requested changes are considered minor modifications to the test method in 40 CFR 63.90(a). Reducing the duration between tests, in this case, does not decrease the stringency of the limit or standard, has no national significance, and is site-specific. GVEA is requesting a one-time increase in the frequency of testing to coordinate 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, EPA is waiving the requirements of 40 CFR 63.10006(f)(1)(ii)(B) in this instance to allow GVEA to rely on sorbent trap mercury testing for 30-boiler operating day LEE tests for EU ID 1 at the Healy Power Plant. GVEA will conduct this testing between July 7, 2026, and August 6, 2026 (*i.e.*, less than 320 calendar days after the completion of the previous test).

This approval is contingent on the sorbent trap mercury testing on EU ID 1 between July 7, 2026, and August 6, 2026, meeting all other requirements of the MATS Rule. This approval does not apply to EU ID 2 or any other equipment. This approval also does not affect the maximum duration between any tests, nor does it affect any other applicable requirement that applies to EU ID 1. After the current test cycle, the requirements of 40 CFR 63.10006(f)(1)(ii)(B) and (f)(1)(iii) shall resume.

If GVEA has any questions about this matter, please contact Geoffrey Glass at EPA Region 10 at glass.geoffrey@epa.gov.

Sincerely,

**KARL
PEPPLE**

Digitally signed by
KARL PEPPLE
Date: 2026.05.21
10:57:52 -07'00'

Karl Pepple
Acting Branch Manager
Air Permits, Toxics, Transportation,
and Communities Branch
Air and Radiation Division

cc: Mr. Moses Coss, ADEC