

Alaska Department of Environmental Conservation
Adoption Updates Package
Response to Comments
May 22, 2012

The Alaska Department of Environmental Conservation (ADEC, the Department) has proposed regulation changes including:

- Update adoption by reference dates of federal rules adopted in 18 AAC 50.035 and 18 AAC 50.040.
- Adopt a federal rule part and new subparts in 18 AAC 50.040.
- Repeal or delete obsolete language in 18 AAC 50.035, 18 AAC 50.040, 18 AAC 50.990, and 18 AAC 50.990 Editor's note.
- Add language to adopt and require Title V standard application forms in 18 AAC 50.035 and 18 AAC 50.326.
- Clarify modeling requirements in 18 AAC 50.215.
- Clarify requirements for owner requested limits in 18 AAC 50.225.
- Adopt clarifications to existing regulations to correct wording, to correct cross-references, and resolve internal regulation conflicts in 18 AAC 50.220, 18 AAC 50.302, 18 AAC 50.326, 18 AAC 50.345, 18 AAC 50.400, and 18 AAC 50.540.

Most of these changes are minor and did not receive comments. The one exception is the proposed Title V Operating Permit Standard Application Package (application package), which received lengthy comments from multiple parties.

This document addresses the public involvement process on the forms, general comments, and finally responds to individual comments made on the forms.

Additionally, after the regulation package went out for public comment, the Department became aware of several issues needing correction:

Additional Revisions:

- The effective date for 18 AAC 50.035(b) was listed incorrectly as December 21, 2010.
 - Action: The language in 18 AAC 50.035(b) has been corrected to read January 1, 2011.
- The proposed changes to the definition for “regulated NSR pollutant” created definition gaps elsewhere in the regulations. In order to resolve the discrepancy, the Department revised the regulations:
 - Action: Adopt the definition “regulated NSR pollutant” as defined in 40 C.F.R. 52.21(b)(50) in 18 AAC 50.040(h)(4)(C)(i) by repealing the exclusion of the 40 C.F.R. 52.21(b)(50) definition.

- Action: Retain 18 AAC 50.040(i)(1)(B)(i) as it currently is written (not repealing as was proposed in the package).
- Action: Revise the definition in 18 AAC 50.990(92) to read “(92) ‘regulated NSR pollutant’ has the meaning given in 40 C.F.R. 51.21(b)(50), adopted by reference in 18 AAC 50.040.”
- The first sentence of 18 AAC 50.326(c) has been revised for clarity by the Department of Law. The revised language states:

18 AAC 50.326:

(c) **Applications. To be timely, an application must satisfy AS 46.14.150, and 40 C.F.R. 71.5(a)(i) – (ii) do not apply. To be timely, an application for renewal must also meet 40 C.F.R. 71.5(a)(1)(iii).** [FOR THE PURPOSES OF 40 C.F.R. 71.5(A)(1)(I) AND (II), A TIMELY APPLICATION IS ONE THAT SATISFIES AS 46.14.150, AND 40 C.F.R. 71.5(A)(1)(I) - (II) DO NOT APPLY.]

Standard Forms Public Involvement Process:

For the forms proposed in this regulation package, the Department used a two step public comment process to gather input from interested parties:

1. Public review and informal comment period (July 30, 2010 to September 30, 2010).
2. Formal rulemaking to adopt the application package by reference (August 25, 2011 to October 17, 2011).

Step 1 – Public Review and Informal Comment Period

The Department developed the proposed forms in this regulation package in consultation with interested parties by making a preliminary draft application package available to the public on July 30, 2010 and holding a public workshop in Anchorage on September 1, 2010. The public notice review period was intended to allow interested parties an early opportunity to review and comment on the application package, including the potential costs to comply with the new application process.

Step 2 – Formal Rulemaking to Adopt the Application Package by Reference

On August 25, 2011, the Department posted a notice of public comment period on proposed changes to Department regulations under Title 18, Chapter 50 of the Alaska Administrative Code (AAC) dealing with Air Quality Control. A public hearing was held Wednesday October 28 from 2:00 to 3:30 pm in the Anchorage DEC Air Quality office. Final comments were due at 5:00 pm October 17, 2011. Among other proposed regulation changes, the regulation package included language to adopt and require Title V standard application forms in 18 AAC 50.035 and 18 AAC 50.326.

Five parties submitted comments and are referenced by abbreviation in the comments below:

- SLR – SLR Consulting

- APA – Alaska Power Association
- Kodiak – Kodiak Electric Association
- AOGA – Alaska Oil and Gas Association
- Entrix – CardnoENTRIX Corp

Many of the comments received in both public testimony and written comment centered on several repeating themes and topics. We address these repeating themes first as general comments (G1, G2, etc.); commenters are identified with the abbreviations provided above. The general comments are followed by a table of specific comments made by each party. These comments are referenced by submitter and comment number, e.g., AOGA-29.

General Comments on Forms

G1. The forms should be optional, not mandatory. (Kodiak, SLR, APA, AOGA, Entrix)

Response from ADEC: The use of the forms will be mandatory. No change will be made to the requirement to use the forms.

We are requiring the application forms for all permit applications submitted under the Title V program to ease the processing and increase the efficiency of applications. Since each application or revised application will look the same, application processing time and requests for additional information should go down.

The Department also expects that once the application package is in continual use by the pool of stationary sources permitted by ADEC, the applicants will see improved efficiencies in application preparation because forms from previous applications can easily be updated and submitted with new applications.

G2. We request at least a three to six month delay period be incorporated into the final regulations requiring the forms so that applications underdevelopment do not have to be rewritten on the new forms, but can be completed under the previous application process. (Kodiak, SLR, APA, AOGA, Entrix)

Response from ADEC: ADEC agrees and will not require the use of these forms until six months after the effective date of the regulations. At that time, all applications will need to be submitted on the new forms.

Because a permit application typically takes about four months to be prepared, the Department has adopted a six month delayed effective date period to allow permits already in preparation under previous application requirements to be completed.

ADEC amended the language in 18 AAC 50.326(c) to include a delayed date for required use of the forms:

... The requirements of 18 AAC 50.205 apply to a permit application, report, or compliance certification under this section, and 40 C.F.R. 71.5(d) does not apply.

After {effective date of the regulations plus 6 months (written as a date)}, an applicant for an operating permit, modification or revision to an operating permit, or renewal of an existing operating permit shall use the Title V Standard Application and Forms, adopted by reference in 18 AAC 50.035(a)(9). The owner or operator of an existing Title V source who is planning a modification that requires a Title I permit as well as an operating permit modification may request either...

G3. The forms require repetitive information in many places. Can they be consolidated to provide that information in only one place? (SLR, APA, AOGA)

Signature requirements: No changes will be made to signature requirements on the forms.

ADEC reviewed the forms for signature requirements. Signatures are required in only three places:

- Form A-1 certifies the stationary source information
- Form A-1R replaces Form A-1 for a permit revision
- Form A-4 replaces Form A-1 in a renewal application in which there are no changes from the original application.

These requirements are not excessive. At most an application would require two signature forms.

Duplicate information: The department made some modifications to the forms to reduce redundant information requirements.

We worked to further limit the need for duplicate information in the forms as much as possible.

However, some duplication is necessary to create well-organized and complete applications that facilitate efficient permit processing and reduce the need for additional information requests. The Department reviewed the final forms to ensure that redundant data fields are minimized.

Internal referencing: The department modified the instructions to allow cross-referencing between forms where the necessary detail is included in the referenced location.

In general, each form will need to be filled out. We are establishing this requirement because not every form will be submitted with every application. As long as all the information required is in the referenced location, the applicant may refer to that portion of the application.

- G4. The forms require the applicant to identify the applicable requirements for each emission unit, which can be repetitive if the permittee has many identical emission units. Can emission units be lumped together on a single form, or alternatively since only certain Federal standards apply within the State, would it not be better to identify the applicable requirement and then list the emission unit(s) subject to that requirement? (APA, SLR, AOGA, Entrix)**

ADEC Response: The Department has modified the instructions to allow regulations for identical units to be combined on one form.

The Department has chosen to require regulations by emission unit because this approach best supports efficient permit preparation. This format allows the application language to be directly translated from the application to the permit, reducing the workload of the permit writer, and should improve permit drafting completeness, accuracy, and speed.

For the applicant, the adopted format makes it easy to group emission units with similar regulatory applicability. Yet by requiring a separate form to identify the applicable regulations for each emission unit, this format supports clearly and appropriately identifying the minor, but important, differences in regulation applicability for each emission unit. We expect copying requirements to an additional form for each emission unit will not be a burdensome task.

Regarding identical units, the Department has modified the instruction to allow applicants to include identical units on a single form.

In addition, sometimes emission units are modified or removed without appropriate updates to the permits. Thus, the explicit requirement to list each emission unit at the stationary source will assist the Department in maintaining an accurate inventory of emission units and provide the basis for an accurate permit.

- G5. Many forms request technical data not required to determine regulatory applicability (e.g. land plots, steam production rates). Please remove these requirements so that they are not used to determine application completeness. (SLR, APA, AOGA, Entrix).**

Response from ADEC: The Department has modified the instructions to indicate that for some applicants, “not applicable” may be an appropriate response for some fields. The Department is not modifying any specific data element field for the requirements for applications to be deemed complete.

The Department understands the concern that data not specifically required for application completeness may be used to determine completeness with these forms. The Department developed the forms so that they prompt the applicant for all of the information necessary to fully describe a stationary source including its emission units, processes, operating scenarios, and any effects that it may have on surrounding areas, such as contiguous and adjacent permitted sources. This approach should reduce the burden on applicants unfamiliar with the Title V process as well as reduce the need for additional data requests for all applicants.

We acknowledge that not all fields on the forms will be applicable to every applicant and “not applicable” may be the appropriate response for some fields. Yet the majority of the information requested is needed to complete the permit. For example, an overhead image or land plot helps staff developing the draft permit understand the stationary source, including any stationary sources located nearby which may have contiguous or adjacent issues within the permit context, or the ability to require monitoring based on physical attributes which are not apparent from a description alone. Other information, such as steam rates, may or may not be needed to determine specific regulatory applicability, but cannot be determined until each element is reviewed in the context of the complete application and applicable standards. Including this data in the application will help the permit writer fully understand the process in which the emission unit is used and will preclude a possible information request at a later date.

The Department merged the descriptive fields into a single application field requesting “*Stationary Source Description (a thorough description of the stationary source, its processes, raw materials, operating scenarios, and other specific information that may be necessary to determine the applicability of Title V requirements.) The information may include property area or map, number of employees, maximum capacity, and other primary emission-generating activities co-located or on adjacent properties.*”

Finally, the Department expects that none of these data elements constitute a burdensome requirement, e.g., an overhead land plot or satellite image graphic of the stationary source can be obtained off the internet for free.

G6. The forms do not allow reference to external application material, such as old applications, which the applicant may use to reduce the size of a current application. (AOGA, Entrix)

Response from ADEC: The Department is maintaining the requirement for no external references.

The Department's application processing procedure requires that all the information needed to process the application be contained within the application package:

- Geographically remote contract permit writers do not have access to past applications.
- As a state agency, the Department follows the legislatively-mandated document retention schedule; legacy application material may no longer be available.
- It is the applicant's responsibility to provide the information needed when applying for a permit.

The Department is aware (AOGA-14) that a permit modification application submitted subsequent to a permit renewal application would be required to include all information provided in the renewal application. This makes each application a stand-alone set of documents where the permit drafter has everything needed to efficiently process the application in a timely manner. For the same reasons, the Department is also requiring the applicant to submit any alternative monitoring protocol or waivers the applicant uses to support a regulator exemption (AOGA-61). The applicant can reasonably be expected to provide a copy of any and all waivers or alternative monitoring protocols that are being used to support source-specific monitoring, recordkeeping or reporting with each application that references them.

G7. Many forms require external data to be copied onto the form, such as EPA TANKS output runs or Excel calculation spreadsheets. In order to reduce error and increase efficiency, can the application forms be modified to accept external data without transcribing it to the forms? (APA, AOGA, Entrix).

Response from ADEC: The Department has modified the instructions to accept external data output and Excel spreadsheets.

Calculation spreadsheets should be provided in both printed form and as electronic files so the Department may review the underlying equations or calculations that support the results.

Individual Comments

The following table includes all verbal and written public comments received during the comment period. Comments received verbally as public testimony are noted with the comment number.

The Department addressed each comment individually and, as appropriate, referenced the relevant general comment. Comments submitted as redline edits were reviewed and have been incorporated as the Department determined appropriate. However, due to the volume of redline edits provided,

we are unable to address individual edits here; refer to final forms for modifications incorporated.

Also note, the Department may revise the forms later (through a regulation update) based upon lessons learned from the first few cycles of application submittals with the forms and industry input.

ID	Comment	ADEC Response
SLR-1 verbal	Responsible official is required to sign on multiple pages and we think that would be slightly onerous and really think it should just be one -- one signature for the entire application.	<u>Action:</u> no changes See response to comment G3.
SLR-2 verbal	The forms actually require that the permit number and stationary source name be entered in on every single page. And considering that these are going to PDF fill-ins, that means every single page they'd have to do a PDF fill-in -- on that which is extremely time consuming. And I don't think it's really necessary since all the identifying information is included in Form A1.	<u>Action:</u> forms modified to require only the permit number on the first page of each form.
SLR-3 verbal	There's a lot of external data that has to be transferred from one form and into your specific forms. For example, the EPA TANKS outputs have to transfer - transferred to the Form B series. And as everyone knows, a lot of mistakes can be made in transferring data, which would lead to more information requests and more problems. And instead, we requested ADEC -- instead of having all the TANKS output data be included as inputs into the form, that ADEC just put a list of everything they want to see in the TANKS output data and let us provide you with that external form that TANKS provides. Same thing is somewhat with the emissions calculations. It requires transferring the emissions calculations from the excel spreadsheet into your specific form. And we requested ADEC switch to allowing -- to having a list of everything they wanted to see in the emission calculations and then allow us to just submit live excel sheets that has all that information and then ADEC can see how the calculations were done and still have all that information without requiring the permittee community to do more transferring of data.	<u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets. See response to comment G7.
SLR-4 verbal	There's some information that is required in the forms that we don't believe has any merit for Title V applicability or rule designation. For example, regional maps and USGS maps, plot lines, anchorage. Those sort of things are required for Title I permitting but aren't used in Title V rule applicability or permitting. And we think that if those elements are required, ADEC can	<u>Action:</u> instructions modified to indicate "not applicable" may be appropriate

ID	Comment	ADEC Response
	determine that an application is incomplete based upon someone, a permittee, not submitting that information, even though that information isn't even used to develop the Title V permit application.	for some applications. See response to comment G5. To date the Department has not judged any application to be incomplete by applicants using the draft forms because of these issues.
SLR-5 verbal	Let's see, there is several different places where information is repetitive. They'll ask for information in B1 and then in B2 it's asked for the same information in just a slightly different format. We prefer that all the information just be required once.	<u>Action:</u> no changes See response to comment G3.
SLR-6 verbal	Let's see, the forms require that actual emissions be included for each emission unit and for each field burning industrial process that are designated as insignificant. However , actual data is not required. Title V is based on potential to emit.	<u>Action:</u> Form D1 modified as follows: For insignificant emission units, expected actual annual emissions are only required if the unit is an insignificant unit on an emission rate

ID	Comment	ADEC Response
		basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-15).
SLR-7 verbal	There are requirements for insignificant units to supply actual data to demonstrate that they are insignificant on emission rate basis. And in those cases, we agree that that should – that information should be included but not for each and every insignificant emission unit that's insignificant, say under F, which is categorically insignificant according to ADEC like, lube -- lube oil tanks. Let's see, I got -- I get that, sorry.	<u>Action:</u> Form D1 modified as follows: For insignificant emission units, expected actual annual emissions are only required if the unit is an insignificant unit on an emission rate basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-

ID	Comment	ADEC Response
		15).
SLR-8 verbal	B1 forms also require that a separate form be submitted for each and every emission unit, instead of having it sort of consolidated and to identifying all the emission units, because a lot of emission units have the exact same requirements. For example, every field burning equipment that's in a Title V permit, you know, turbines, engines, that sort of thing, all have to meet 18 AAC 055. For visibility emissions, in particular matter sulfur, and there is a facility wide portion of the form, which you could put that in. But not everything in our facility is necessarily going to be subject to fill the 18 AAC 50.055 because it's not -- everything is field burning. So, you know, fuel – storage tanks and those sort of things, so I think we're getting -- it's getting a little bogged down on the repetitiveness for each emission unit. So, also a lot of engines are the same make and model and have a lot of the same requirements outside of 18 AAC 50.055 that would like to be able to consolidate into, you know, maybe one page or one form.	<u>Action:</u> modified instructions to allow <u>identical</u> units to be combined on one form. See response to comment G4
SLR-9 verbal	The B -- form B1 also requires to report the install dates, serial numbers, steam production rates, steam pressure and steam temperature. Besides the installation date, the information is not required for rule applicability and, so that'd be a completeness issue within the application. And it also requires both the design rate of capacity and maximum hourly firing rate information, which is also unnecessary to evaluate applicability. And we request that ADEC remove those requirements to be in the form as a completeness issue.	<u>Action:</u> no changes While this information is not needed to determine rule applicability, it is needed to fully develop the permit. See response to comment G5.
SLR-10 verbal	Form B2 requires the rate of capacity and horsepower hour or kilowatt hour. Those are output -- and we do use input units, which are horsepower and kilowatts. Also it requires that you -- that the permittee include horsepower kilowatt and MMBtu. And we request that ADEC reduce that to	<u>Action:</u> forms modified to require heat input or to

ID	Comment	ADEC Response
	just one because you can get to all the others very simply with conversion factors and request the one that you most prefer, I suppose.	specify rating where applicable. Various federal rules (RICE MACT) require size or rating while others (Boiler MACT) require heat input capacity. The appropriate entry should be provided.
SLR-11 verbal	Okay. B4 relates back to the EPA TANKS example provided before. It requires that they transfer all the information from the EPA TANKS programs into your -- into the ADEC specific form, which could potentially have quite a few errors instead of just allowing the permittee to submit the EPA TANKS output file. And we request that B Form be deleted and require that the output form be provided.	<u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets. See responses to comments G7 and SLR-3.
SLR-12 verbal	Also, emissions from low vapor pressure products, such as -- from tanks -- such as distillate fuels, We don't think should be included as a requirement in the forms. Most distillate fuel tank -- storage tanks emit less than one ton per year, usually less than .01 tons per year VOC. And ADEC actually has been designated as insignificant -- the most low vapor pressure storage tanks as categorically insignificant.	<u>Action:</u> no changes. See response to comment G5 and SLR-7.

ID	Comment	ADEC Response
SLR-13 verbal	Please delete the D -- form D series there – and instead require the permittee to submit live excel spreadsheets containing the calculations, instead of having the form D series presented now. Make it a list of everything ADEC wants to see in a live excel spreadsheet.	<p><u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets.</p> <p>See responses to comments G7 and SLR-3.</p> <p>ADEC is unable to provide a comprehensive list of all calculations that covers all cases. Applicants may contact the Department with questions about individual permits.</p>
SLR-14 verbal	And please delete the requirement to calculate the expected actual annual emissions for all units. Insignificance levels in 18 AAC 326 requires actuals from the past two years to demonstrate that its insignificant unit, based on an emission rate basis and ADEC does not -- well Title V rule applicability does not use actual projected – actual annual emissions. And, therefore, it shouldn't be a required element of the application. Let's see, we already talked about that. Okay.	<p><u>Action:</u> Form D1 modified as follows:</p> <p>For insignificant emission units, expected actual annual emissions are only required if</p>

ID	Comment	ADEC Response
		<p>the unit is an insignificant unit on an emission rate basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-15).</p> <p>See response to comment G5.</p>
SLR-15 verbal	<p>E -- Form E4 requires is a the -- the -- has the same requirements as Form B series, which already requires that each field be submitted with each individual emission unit and therefore we don't think -- we think ADEC -- we requested ADEC consolidate these two forms together and that -- I think that'll do it, or I'm done.</p>	<p><u>Action:</u> no changes.</p> <p>See response to comment G3.</p>
Kodiak-1 verbal	<p>Due to ongoing cycles of Title V renewals, I would request that if the forms become finalized and adopted into the regulations, that there be a window of opportunity for transition that the implementation date and require date to use the forms be extended out for a period, at least six months. So, for example, if these rules go into regulation January 1, 2012, I request that they do not be required for a Title V Permit application until July 1, 2012. That six month window would give a transitional -- lead the transition into the new reg so that any permit applications that are</p>	<p><u>Action:</u> Use of the forms will not become mandatory until six months after the effective date of the regulations.</p>

ID	Comment	ADEC Response
	currently being developed can still move forward without having to redo the application processes.	See response to comment G2.
SLR-16 verbal	<p>SLR Consulting supported Kodiak Electric Association Comment No. 1, and added the following: Comment and support it, as well, with the six-month delay after -- after the regulations become effective. Mainly because, if the regulations come into effect as she put into example on January 1, 2012, a permittee may have the requirement to submit a permit application no later than January 2, 2012, creating an impossible situation where they wouldn't be able to complete the forms in time. And secondly, even if there is lead time and they know these forms are coming, six months is a more reasonable transition time to allow for the larger companies that have multiple permits, not just, you know one or two, but you know, 26 that may be coming due all within the same sort of time frame. I don't know that situation is actually true, but this -- for example, and that would give them the time that they would need to actually create all the new applications for their stationary sources.</p>	<p><u>Action:</u> Use of the forms will not become mandatory until six months after the effective date of the regulations.</p> <p>See response to comment G2.</p>
APA-1a	<p>Eliminate Extraneous Information Requests:</p> <p>According to 40 CFR 71.5(c) as adopted in 18 AAC 50, only the information necessary to determine rule applicability and requirements of the Clean Air Act are required to be included in a Title V application. Yet, throughout the newly proposed Title V application forms, ADEC is requiring additional information that extends beyond the jurisdiction of the Title V program. APA is concerned that the extra time, effort and cost needed to complete portions of these proposed forms is unwarranted.</p>	<p><u>Action:</u> no change</p> <p>See response to comment G5.</p> <p>The Department's authority to require specific information be included for an application to be deemed complete stems from §71.5. While the items in</p>

ID	Comment	ADEC Response
		<p>§71.5(a)(2) are required for completeness, §71.5 does not limit completeness to these items. The section also gives the Department authority to develop a standard application package to “best meet the program needs and administrative efficiency.” The Department is also authorized to request additional information under 18 AAC 50.200.</p>
APA-1b	<p>Proposed Form A2 requires the submission of property area information including a regional map and a USGS map; however, that information is not used to develop a Title V operating permit. While such geographical information may be required to obtain a minor permit or a PSD permit under the Title I program, Title V permits do not require modeling. Establishing the area, terrain, and elevations of the stationary source is not required for determining applicability to regulations, and APA is concerned that ADEC would deem an application incomplete if such unnecessary</p>	<p><u>Action:</u> no action See response to comment G5 and APA-1a.</p>

ID	Comment	ADEC Response
	<p>information were not included in the application. While ADEC may have a desire for this extra information, the request for it is not warranted under the regulatory code. Since the requested property area information in Form A2 is not required for Title V permit/rule applicability, APA feels that ADEC should remove this extraneous information request from the proposed Title V application forms.</p>	
APA-1c	<p>Proposed Form A2 also requires the applicant to include a description of any proposed modifications that will occur in the future. Yet, Title V operating permits are intended to only address requirements applicable at the time of permit issuance. Future hypothetical changes at a stationary source should not be required in a Title V permit application.</p>	<p><u>Action:</u> no action. The applicant should include any <u>known</u> proposed modifications in the application. If a permittee has pre-approved changes authorized under a PAL permit or flexible air permit that are known and pre-planned, or a minor permit application being developed, the applicant should include these changes in the permit application.</p>

ID	Comment	ADEC Response
APA-1d	<p>Proposed Forms A3 and A4 both require an operating schedule for the hours/day, days/week, and weeks/year that a unit is run; however, all of the emission calculations relating to a Title V permit are based on the potential to emit. The potential to emit is determined by an operation of 8,760 hours per year, or by an applicable operating limit. Requiring operating schedule information in a Title V application is unnecessary and should be eliminated. If ADEC desires actual emission data, then it should refer to the emission inventories that are already reported by each stationary source on an annual or triennial basis, rather than require it to be provided in a Title V permit application.</p>	<p><u>Action:</u> forms modified to suggest this information as part of the stationary source description, but not require it on Form A2. A renewal application only needs to include a Form A2 if there have been changes to this information since the previous permit (item 3 of Form A4).</p> <p>Sources operating under multiple operating schedules must provide operating schedule information for the Department to determine or regulate emissions.</p> <p>If no specific</p>

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		<p>operating schedule is used in the emission calculations other than the 8,760 hr/yr assumption or as required in §71.5(c)(7), then this section can be marked “not applicable.”</p> <p>If a specific schedule is used to limit emissions, then it should be described here.</p>
APA-1e	<p>Further, the requirement to calculate expected actual annual emissions for all units should be eliminated from proposed Form B2. Other than determining the significance of an emission unit (EU), rule applicability is not based on actual emissions; therefore, there is no basis for ADEC to require that information for the application to be complete.</p>	<p><u>Action:</u> no action. See responses to comments G5 and SLR-14.</p>
APA-1f	<p>Proposed Form A4 requires the applicant to report their number of employees. This information is not required to determine rule applicability and should not be included in the Title V permit application forms.</p>	<p><u>Action:</u> forms modified to suggest this information as part of the stationary source</p>

ID	Comment	ADEC Response
		description, but not require it on Form A2. A renewal application only needs to include a Form A2 if there have been changes to this information since the previous permit (item 3 of Form A4).
APA-1g	Proposed Form B1 requires the applicant to report steam production rate, steam pressure, and steam temperature; yet, only the design rated capacity and maximum hourly firing rate information are needed to evaluate NSPS and MACT applicability. Proposed Form B3 requires information on gas residency time, maximum flue gas outlet temperature, and other extraneous information that is unrelated to rule applicability or emission calculations. Such information requests contained throughout the B Series Forms that are unrelated to rule applicability should be eliminated from the forms.	<u>Action:</u> no action. See responses to comments G5. And SLR-9
APA-1h	APA requests that ADEC re-examine each of the newly proposed Title V application forms and eliminate any information requests that are not required by the Title V program.	<u>Action:</u> The Department merged the descriptive fields into a single application field requesting

ID	Comment	ADEC Response
		<p><i>“Stationary Source Description (a thorough description of the stationary source, its processes, raw materials, operating scenarios, and other specific information that may be necessary to determine the applicability of Title V requirements.) The information may include property area or map, number of employees, maximum capacity, and other primary emission-generating activities co-located or on adjacent properties.”</i></p> <p>See response to</p>

ID	Comment	ADEC Response
		comment G5.
APA-2	<p>Design Forms per Rule. Rather than per Emission Unit</p> <p>The proposed Title V application forms are currently designed so that each emission unit (EU) must be listed separately, with rule applicability repeated over and over for each EU. This is a very cumbersome approach to a Title V permit application. Many stationary sources have multiple units with the same make, model, and emission profile, and completing the same form multiple times with the same information is repetitive and unnecessary.</p> <p>APA requests that ADEC consider re-designing the forms so that they are based on rule applicability for all units at the stationary source. For the vast majority of Alaska sources, there are only a handful of potentially applicable requirements - 18 AAC 50.055(a)-(c), NSPS Subparts De, Kb, GG, KKKK, IIII, JJJJ, and MACT Subparts JJJJJ, and ZZZZ. ADEC could create forms for this limited number of standards, along with a generic applicable standard form that could be used for all other rules for which a specific form had not yet been created.</p> <p>This per-rule approach would help the applicant identify applicable standards, and it would better match the current operating permit structure where the standard is listed followed by each EU subject to it. These redesigned forms would allow for multiple units to be listed together if they are identical, which would help to streamline the application process.</p> <p>Also, since each regulation has defined applicability triggers expressed in specific units of measure, designing the application forms by rule would help clarify how engine specification data should be presented in the application forms. For example, rules related to RICE engines are typically triggered by a horsepower rating, while rules relating to turbines and boilers typically are typically triggered by rated heat inputs (MMbtu/hour). Being able to specify the exact data format in each per-rule form would help clarify the application requirements, thereby eliminating time-consuming follow-up requests for data after an application has been filed.</p>	<p><u>Action:</u> modified instructions to allow identical units to be combined on one form.</p> <p>See response to comment G4.</p> <p>Regarding units of measure, as the commenter notes, various federal rules (RICE MACT) require size or rating while others (Boiler MACT) require heat input capacity. The appropriate entry should be provided.</p>

ID	Comment	ADEC Response
APA-3	<p>Distinguish Significant and Insignificant Emission Units</p> <p>Pursuant to 18 AAC 50.326, certain insignificant EUs are specifically excluded from being required in a Title V application. Yet, the proposed B-Series Forms require that each EU at the source be included in the Title V permit application regardless of whether the unit is insignificant, unregulated, or both. While 18 AAC 50.326(d)(4) states that an application cannot omit information needed to evaluate fees, the cost borne by utilities to collect and report the actual and potential emissions from insignificant sources far exceeds the negligible amount of revenue that ADEC may generate through emission fees on insignificant units. APA requests that ADEC revise the forms to allow an applicant to distinguish between significant and insignificant EUs throughout the Title V application.</p> <p>ADEC should not require emissions estimates from tanks storing low vapor pressure products, such as distillate fuels. Such tanks represent the vast majority of units in Alaska and are all insignificant, even at bulk storage facilities. ADEC can easily verify the very low emissions using the TANKS program, and a hypothetical case of a very large tank (e.g., 1,000,000 gallons) and a very high throughput (e.g. 20,000,000 gallons per year). Emissions from such a grossly excessive scenario are still less than 1 tpy VOC. Virtually all typical distillate tank emissions are less than 0.1 tpy VOC. Further, distillate storage tanks are exempt from federal emission standards and have no applicable requirements. APA believes there is no reason for ADEC to require such extensive data on these tanks as part of the Title V permit process.</p> <p>After an applicant lists each EU that is insignificant on an emission rate basis or on a size/production rate basis in Form B, the proposed B1 through B9 Forms should then only be required for regulated, significant EUs.</p>	<p><u>Action:</u> Form B has been modified to add a separate page for insignificant units.</p> <p>Form D1 has been modified as follows: For insignificant emission units, expected actual annual emissions are only required if the unit is an insignificant unit on an emission rate basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-15).</p> <p>All applications containing insignificant</p>

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		<p>pollutant emitting activities shall include those emission units under 18 AAC 50.326(d)(3) & (4). Based on the submitted information the Department will determine whether IEU categorization and emissions require further investigation.</p> <p>The Department has found that emission units are sometimes modified without applying for appropriate permits. Also, emission units are sometimes physically removed, but remain in the permit because the</p>

ID	Comment	ADEC Response
		<p>permittee does not provide an accurate emission unit inventory. The explicit requirement to list each emission unit at the stationary source is intended to assist both the permittee and the Department.</p>
APA-4a	<p>Eliminate Redundant and/or Unnecessary Information Requests</p> <p>In general, if information is already required in one form, then an applicant should simply be able to reference that part of the application rather than repeating that information over and over throughout the application.</p>	<p><u>Action:</u> modified instructions to allow cross-referencing between forms for identical information.</p> <p>See response to comment G3.</p>
APA-4b	<p>Proposed forms A2, A4 and B2 require information that is already reported in the emission calculations, if relevant. Proposed Form A2 requires the maximum hourly and annual capacity to be reported, while this is already reported in the emission calculations. Proposed Form A4 requires the applicant to submit process information in the form of production, fuel usage, and raw material usage, which if relevant would already be included in the emission calculations. Proposed Form B2 requires fuel usage and maximum hourly firing rate, but again this information would be included in</p>	<p><u>Action:</u> modified instructions to allow cross-referencing between forms for identical information.</p>

ID	Comment	ADEC Response
	the emission calculations, if it were relevant. Requiring this information again in Forms A2, A4 and B2 is repetitive and unnecessary.	Forms A2 and A4 have been modified to suggest capacity and process information as part of the stationary source description, rather than require it. See response to comment G3.
APA-4c	The proposed forms also require multiple signatures by the Responsible Official throughout the entire application. Requiring multiple signatures and certification statements is repetitive and unnecessary. APA suggests that ADEC redesign the application package so that the certification statement can be made with only one signature by the Responsible Official, rather than including the certification statement within each of the separate forms.	<u>Action:</u> no action. See response to comment G3.
APA-4d	Also, each page of the proposed form requires the applicant to input the stationary source name and permit number. Since these forms will likely be used in a fill-in PDF format, the applicant is then required to manually input the stationary source name and permit number over and over on every single page of the application. APA recommends that ADEC remove this cumbersome requirement. A stationary source can provide its name and permit number information once on Form A1, and then submit to ADEC a bound application as one single document. By requiring a bound application document, ADEC would avoid having different pages of one application separated and confused with another stationary source's application. If ADEC must require identifying information on each page, then it should either be the stationary source name or the permit number, but not both.	<u>Action:</u> forms modified to require only the permit number on the first page of each form. See response to comment SLR-2.

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APA-4e	<p>The proposed application instructions also require the applicant to manually number each page of the completed application, which is another cumbersome exercise. While it is understood that different stationary sources will use different sets of forms, ADEC should simply use the numbering system currently included in the forms as they are. If additional pages are needed, then the instructions can require that the page number for that form be electronically updated accordingly.</p>	<p><u>Action:</u> instructions modified to remove the requirement to number the pages of the application. The pages of each form should be numbered , i.e., Form D, pages 1 – 5, etc.</p>
APA-4f	<p>In addition to the cumbersome administrative requirements imposed by the newly proposed application format, the new application forms also require re-submittal of information that had already been provided to ADEC. If the intent of the new application forms is to increase efficiency, then the forms should be clarified and streamlined to allow the efficient preparation of a Title V permit application. When supporting information is not necessary or is inapplicable, then that additional supporting information should not be required in the Title V application forms.</p>	<p><u>Action:</u> no action. See response to comment G6.</p>
APA-4g	<p>Proposed Form A3 asks for different alternate operating scenarios that may trigger different applicable requirements than those to which the source is otherwise subjected; yet most stationary sources do not require multiple operating scenarios in their Title V permit. The proposed application forms should be better designed to prevent the re- submittal of supporting information that is not required, and avoid the need for applicants to prepare alternative operating information when their stationary source does not choose to have more than one operating scenario. APA requests that ADEC identify which components of each form are only required “if applicable” and clarify the forms language accordingly.</p>	<p><u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications. If a specific schedule is used to limit emissions, or</p>

ID	Comment	ADEC Response
		change rule applicability, then it should be described here.
APA-4h	After an initial Title V permit has already been issued, a Title V renewal application should only focus on any changes from the previous permit rather than requiring repeated submittals of supplemental information. Title V renewal applications should be more streamlined and quicker to process than an initial Title V permit, and the proposed application forms could be clarified to better reflect that.	<u>Action:</u> no action. We agree that renewal applications should be more streamlined with the new forms. Previously submitted forms for those elements of the facility that have not changed can be resubmitted as is.
APA-4i	The proposed Title V application forms require a significant amount of information to be transferred from an external source into the ADEC forms, such as EPA TANKS output file into Form B4, or from live Excel spreadsheets into the D series forms. Transcribing data can require a substantial amount of time, especially if the format of the ADEC form is inconsistent with the format of the original, external source. The proposed forms should not require information to be transferred, but rather should continue allowing an applicant to reference the detailed TANKS output file, or a live Excel spreadsheet that already contains all the parameters needed to process a permit application. If ADEC requires a standard format for the live Excel spreadsheets or desires a specific format for the summary of total stationary source emissions, then ADEC can simply provide that guidance in the	<u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets. See responses to comments G7 and SLR-3.

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	forms' instructions. Requiring a redundant transcription of information into separate forms is an inefficient use of time, and potential source of transcription errors.	
APA-5	<p>Provide a Six-Month Delay for the Effective Date</p> <p>If these newly proposed Title V permit application forms are implemented, APA requests that ADEC allow for a six-month delay in requiring use of the new application format. Providing a six-month delay from the new rule's effective date is a common practice by EPA when it implements new regulatory requirements. Understanding the new application format and forms, and preparing information according to the newly required forms will take time. Providing a delayed effective date allows current applicants to proceed with submitting their Title V permit applications in a timely manner, while also providing advance notice to future applicants of the new application requirements.</p> <p>It is unreasonable for ADEC to require utility staff who are currently working on Title V permit applications for stationary sources to rewrite their entire permit applications according to a newly adopted format. Reasonable flexibility should be provided to stationary sources currently engaged in the permit application process. Providing a six-month delay in the effective date of this regulatory change would provide that needed flexibility for stationary sources currently engaged in Title V permit applications.</p> <p>APA is extremely concerned over the potential compliance problems that could arise if the forms become effective upon adoption into AAC regulations without a delay in effective date. If the new Title V permit application requirements are adopted into regulation on February 28, 2012 when a utility is required to submit their permit application no later than March 5, 2012, then the utility would only have 5 days to rewrite their entire permit application according to the new format. If the utility staff or their consulting team is unable to rewrite and submit a timely and complete application to ADEC according to the new application format before their required deadline, then</p>	<p><u>Action:</u> Use of the forms will not become mandatory until six months after the effective date of the regulations.</p> <p>See response to comment G2.</p>

ID	Comment	ADEC Response
	<p>the stationary source would no longer qualify for a permit shield. Losing a permit shield would require a utility to either stop operations at their stationary source, or risk becoming a high priority violator for operating their power plant without an operating permit when their current Title V permit expires six months later.</p> <p>The arbitrary implementation of a new application format should not force a utility into a situation where it would have to either shutdown operations at its power plant, or face penalties imposed on violators. Providing a reasonable six-month delay in the implementation of the new application format would avoid this unfortunate situation.</p>	
AOGA-1	<p>In the August 25, 2011 proposed amendment to 18 AAC 50.326(c), ADEC has included language indicating that “an applicant for an operating permit, modification, or revision to an operating permit, or renewal of an existing operating permit shall use the Title V Standard Application and Forms, adopted by reference in 18 AAC 50.035(a)(9). (emphasis added)</p> <p>Section 502(b) of the Clean Air Act (CAA) requires EPA to promulgate regulations establishing minimum elements of the Title V permit program, with one of these elements being a standard application form. The Alaska Statute mirrors this requirement under AS 46.14.140(a)(1), directing the ADEC to adopt regulations addressing elements of the emission control program, including a standard application form that meets the requirements of Section 502(b) of the CAA. EPA addressed the above CAA directive in 40 CFR 70.5(c) and 71.5(c). In both cases, EPA requires the development of a standard form by the permitting authority. However, neither Part 70 nor 71 require the owner or operator of the Title V source to use the forms developed by the administrator. At 40 CFR 70.5(a)(2) and 71.5(a)(2), an application is deemed complete if it provides all the information required by 40 CFR 70.5(c) or 71.5(c), as applicable. Use of the form is not specified.</p> <p>In the 18 AAC 50 rule package, we suggest the ADEC insert clarifying language similar to that found in the State of Washington Title V program at WAC 173-401-500(7)(a), which states the use</p>	<p><u>Action:</u> no action.</p> <p>See responses to comments G1 and G5.</p> <p>Adopting the forms as optional does not meet the Department’s goal of standardization and efficiency improvements since not all applications would be in the same format. The forms will be required.</p> <p>Specific data items</p>

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	<p>of a standard application form is not required if all of the data elements required in the application form and relevant to the stationary source are provided. AOGA believes this approach is consistent with 40 CFR 70.5(a)(2) and 71.5(a)(2).</p> <p>Alternatively, AOGA believes that ADEC could insert additional language into the proposed revisions to 18 AAC 50.326(c) that allow the use of an alternative application format by an applicant if approved by the Department for that applicant, and provided the Department agrees in principle and would be willing to grant such an approval on a reasonable basis. (See our specific requested rule language revisions in comment 2, below.)</p> <p>Importantly, whether the ADEC requires the use of specific forms or simply references in regulation the required form data elements that are to be included in an application, the forms themselves must contain only information required to deem the application complete as discussed in comments 5 and 6, below. Further, AOGA formally requests that ADEC explain in the public record how each individual data element that we have identified as unnecessary, but ADEC believes to be necessary and does not remove from the forms, is or will be specifically used to develop or renew Title V permits.</p>	<p>identified as unnecessary in comments are discussed in that comment response.</p>
AOGA-2	<p>We request that if ADEC elects to require use of the standard application and forms, ADEC allow for at least a three month delay in making the Title V application forms required, but would prefer a 6 month delay due to the time that could be required to transfer an application for a large stationary source to the forms. Deferral of the effective date of a rule is common practice by EPA. For example, 40 CFR 63 Subpart ZZZZ (Subpart ZZZZ) regulations were modified on March 3, 2010 and EPA delayed the “effective” date of the rule to two months later, May 3, 2010, in order to give affected facilities time to come into compliance.</p> <p>Importantly, if the forms become effective upon adoption into regulations, there could be potential non-compliance for a source immediately upon the date of the rule change. For example, if the</p>	<p><u>Action:</u> Use of the forms will not become mandatory until six months after the effective date of the regulations.</p> <p>See response to comment G2.</p>

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	<p>forms are adopted into regulation on February 28, 2012 and a stationary source is required to submit a permit application no later than March 1, 2012, the stationary source would only have 1 day to complete the forms. If a timely and complete application is not submitted before the required deadline, the stationary source will no longer qualify for a permit shield and either must stop operations or become a high priority violator for operating a stationary source without a Title V permit when the permit expires (6 months after the required submittal deadline). If the stationary source opts to shutdown the stationary source until a Title V permit can be issued or a compliance order by consent is agreed upon, the operations may be shut down for a period of months to years. If the stationary source opts to continue to operate without a Title V operating permit, the stationary source would be a high priority violator (HPV). A HPV is subject to enforcement actions and severe penalties. Allowing a delay in the “effective” date of the requirement to use the Title V standard application forms could help to avoid both situations.</p> <p>We understand that once the Commissioner signs the regulation into law, there will be a 30 day window before the Title V standard application forms would become a regulation. However, during those 30 days the Department of Law (DOL) can make changes to the forms. So even if a permittee were to prepare the forms ahead of time, DOL could make significant enough changes that the forms would need to be completely redone. And continuing with the scenario described above, 1 day would not be or even 30 days may not be enough time to complete the forms and submit them timely.</p> <p>The rule revisions we propose below would address this issue as well as our previous comment requesting that use of the forms should not be required. The following is our preferred revision to the regulation: “An applicant for an operating permit, modification or revision to an operating permit, or renewal of an existing operating permit shall use the Title V Standard Application and Forms, adopted by reference in 18 AAC 50.035(a)(9), unless the applicant has received approval from the department to use a stationary-source specific application format. To be deemed complete,</p>	

ID	Comment	ADEC Response
	<p>the application must include all information outlined in the Title V Operating Permit Application Completeness Checklist, which is included with the Title V Standard Application and Forms package.”</p> <p>Alternatively, the rule language could be amended as follows to at least address deferral of the effective date: “An applicant for an operating permit, modification or revision to an operating permit, or renewal of an existing operating permit shall use the Title V Standard Application and Forms, adopted by reference in 18 AAC 50.035(a)(9), beginning no later than [6 months after the effective date of the amended regulation].”</p>	
AOGA-3	<p>Based on our experience, the minor air quality permit application forms created by the ADEC did not streamline the application process and instead made the application process more burdensome for both the permittee and ADEC. More information requests appear to be required to complete the application process, not less. In many cases, the information requested is only necessary to complete the form, not to develop the permit, resulting in a “fill in the box” approach that is inefficient. We believe that the forms as currently proposed could be streamlined to improve their administrative efficiency and still meet the needs of the ADEC Title V program. Some requested improvements are included in our comments below.</p>	<p><u>Action:</u> no action.</p> <p>The Department intends the Title V permit application forms to be efficient for both the applicant as well as the Department by making most information available in the application from the start. Unique circumstances may require additional information requests.</p>

ID	Comment	ADEC Response
		<p>The Department may revise the forms later based upon lessons learned from the first few cycles of application submittals with the forms and additional industry input.</p>
AOGA-4	<p>We suggest that where the requested information must be generated externally before being listed in the application form, e.g., emissions calculations prepared in Excel spreadsheets, the associated form be either eliminated or significantly simplified by stating only the required elements, and referencing the external information source, which would be required as an attachment.</p> <p>For example, Form B4 requires a significant amount of information to be transferred from an external source into the forms (e.g., from the EPA TANKS output file). Transcribing such a large amount of data can cause significant delays if the format of the form is inconsistent with the format of the information from the original, external source. Such inconsistencies have been observed when using the Minor Permit forms and have caused significant delays in obtaining minor permits by prompting a series of information requests. We suggest redesigning the forms to eliminate the transfer of information, and to allow the permittee to reference the “detailed” information attached to the application such as the TANKS output file containing all the tank parameters. We find this approach superior because transferring the information to the forms is unnecessarily time consuming, and subject to error. The forms are better served for bringing together in one place</p>	<p><u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets.</p> <p>See responses to comments G7 and SLR-3.</p>

ID	Comment	ADEC Response
	information that was obtained from several sources or documents, e.g., emission standards applicable to an emission unit.	
AOGA-5	<p>The Series B Forms B1-B9 as currently drafted require the permittee to obtain and incorporate into the application very detailed emission unit information, the majority of which will not be utilized by ADEC to determine federal or state air quality rule applicability, estimate assessable emissions or prepare the permit. We strongly believe that information not directly used to develop the permit should not be required by the forms because the forms are being established to verify the completeness of the application. The issue of completeness is a critical one. As the ADEC is aware, the permittee cannot lawfully operate a Title V source without a valid Title V permit or permit application shield, the latter requiring a complete application.</p> <p>We request that ADEC be very careful not to create incompleteness issues related to extraneous, unnecessary or redundant information. Because the forms do not otherwise differentiate between critical and noncritical data, we conclude that every applicable blank must be filled by the applicant, or the application will be deemed incomplete. Alternatively, ADEC would need to train staff to judge which information is actually required for completeness. By doing this, ADEC would then clearly establish that some of the information required by the forms was indeed irrelevant to evaluating completeness.</p> <p>More practically, we believe the forms should be streamlined, and only require information directly related to the completeness determination. Collecting data that is extraneous is a significant burden to both the permittee and ADEC staff because its presence unnecessarily complicates and lengthens the forms. We can think of no reason how such an approach will improve/ streamline the Title V permitting process, which we assume is a key ADEC goal.</p>	<p><u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications.</p> <p>See response to comment G5.</p>
AOGA-6	We also note that although ADEC provided for some differentiation between initial and renewal applications, the forms are generally more appropriate for an initial application. We suggest that	<u>Action:</u> modified instructions to

ID	Comment	ADEC Response
	ADEC revise the forms and instructions to better clarify and establish the information required for initial versus renewal applications, or prepare a completely different set of forms for renewal applications.	clarify what is required for initial versus renewal applications.
AOGA-7	Further to our previous comment, as currently directed, permittees with Title V Operating Permits already in place and who would now be required to complete the forms cannot take advantage of the Department's direction suggesting that forms submitted previously that are unchanged need not be submitted again with a permit renewal application. Since in every case these forms have never been completed previously, all permittees will be required to prepare the next permit renewal application after the effective date of the rule as if it were an application for an initial permit, with extraneous data requests that clearly were not critical for preparation of the Title V Operating Permits that are already in place. We request that ADEC include a provision in the instructions for permit renewal applications indicating that the instructions for permit renewal form requirements can be followed as if a standard form had previously been used with the initial permit application, even if the standard forms were not used previously. In other words, submittal of a form as part of any permit renewal application for existing permits issued prior to the rule change would only be necessary to document changes to the source, applicable requirements, non-applicable requirements, etc.	<p><u>Action:</u> no action.</p> <p>The first time applicants renew existing Title V permits, they will need to submit the completed forms. The Department recognizes this will require effort on the part of the permittee but anticipates both the Department and the permittee will benefit in the long-term from having the application materials in a standard form.</p> <p>See also the responses to</p>

ID	Comment	ADEC Response
		comments G3 and G6.
AOGA-8	<p>A signature by the Responsible Official is required by Forms A1 and A4. For a renewal permit, the permittee is required to fill out Form A4. However, if any changes have been made to the information contained in Form A1, the permittee must also fill out Form A1. Instead of including the certification statement within the forms, we request that ADEC state in the instructions that the application must include a signature by the Responsible Official following the certification statement. We request that if information is already required in one form that the permittee may just reference that part of the application.</p>	<p><u>Action:</u> modified instructions to allow cross-referencing between forms for identical information where necessary detail is included in referenced location. See the responses to comments G3 and G6.</p>
AOGA-9	<p>Each page of each form requires that the permittee input the stationary source name and permit number. Since this going to be a fill-in PDF form, the permittee will have to input the stationary source name and permit number on every page. Please remove the requirement to state the stationary source name and permit number on every page and just require the information be included only on Form A1. Instead of requiring the information on each page, please update the instruction to require that the entire hard copy of the application be bound into one single document. That will prevent the different pieces of the application from being separated and someone confusing one piece of an application as belonging to a different stationary source. Or if ADEC requires identifying information on each page, please only require either the stationary source name or the permit number.</p>	<p><u>Action:</u> Forms modified to require only the permit number on the first page of each form.</p>

ID	Comment	ADEC Response
AOGA-10	<p>On the first page of the instructions titled “Submitting the Alaska Title V Operating Permit Application to the Department” it states that:</p> <p>“Upon completing the application materials, the owner/operator should:</p> <ol style="list-style-type: none"> 1. Print a hard copy of the application and number the pages of the application sequentially starting with ‘1’ in the top right corner of each page of the application.” <p>We acknowledge that different applications will use different forms and therefore the numbering of each application may be different. However, requiring manual input of each page number is time consuming and costly. Instead, we request ADEC use the numbering system currently included in the forms as they currently are. If additional pages are needed, the instructions can require that the page number for that form be electronically updated. For example, the Form B Supplement Emission Unit-Specific Shield Request may require additional pages. In this case the permittee would be required to update the page numbers currently located at the bottom right hand corner. This would require that the form allow manipulation of the total number of pages and the page number.</p> <p>As a separate option to hand entering page numbers, include on the top of each page a field that can be updated for the page number and total number of pages.</p> <p>The proposed forms will be more difficult for rural stationary sources to use because of their complexity. The forms are repetitive and require information not readily available to most stationary sources, some of which is not used to directly evaluate applicability or emissions (e.g., specific plot lines and acreage).</p>	<p><u>Action:</u> modified instructions to remove the requirement to number the pages of the application. The pages of each form should be numbered , i.e., Form D, pages 1 – 5, etc.</p>
AOGA-11	<p>The permittee should not be required to submit electronic copies on CD, which are being phased out by the computer industry. Other formats should be allowed, e.g., USB flash memory drive, or email (perhaps to a dedicated email address of ADEC’s choosing).</p>	<p><u>Action:</u> modified instructions to clarify acceptable</p>

ID	Comment	ADEC Response
		<p>submission media. Applicants may submit applications via a variety of media, including: CD, data-DVD, or USB drive.</p>
AOGA-12	<p>As discussed below, some supporting information is unnecessary, except for an initial Title V application. The instructions state that some information is only required “if applicable.” We request that ADEC identify which components of the forms are only required “if applicable” in the actual form.</p>	<p><u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications. See response to comment G5.</p>
AOGA-13	<p>To aid an applicant’s intent to be compliant with applicable submittal requirements, these instructions should include information on what is required to be submitted to EPA. We suggest using language similar to that used in ADEC’s Standard Operating Permit Condition XIV, except that the permittee should be instructed to submit a copy of initial Title V Operating Permit applications as well as applications for modification or renewal (SPC XIV does not address initial applications). In addition, the instructions should provide the appropriate EPA address where copies are to be sent, similar to the standard language that ADEC includes in Title V Operating Permits.</p>	<p><u>Action:</u> instructions modified to direct applicant to submit application to EPA and include EPA’s mailing address.</p>
AOGA-14	<p>The instructions for Form Series A seem to provide conflicting instructions and directions regarding. On the one hand, the instructions indicate that for a renewal application, only certain forms and</p>	<p><u>Action:</u> instructions modified to clarify</p>

ID	Comment	ADEC Response
	<p>supporting documentation are to be provided. However, the instruction also indicate in bold font that renewal applications “shall not incorporate reference to any previous permit applications” and “shall be a complete stand-alone document with all required information”, which implies that a renewal application must include all information that was provided in the initial application. We request that ADEC remove or modify the language indicating that each application must be a complete stand-alone document. The forms proposed by ADEC (at least those in Series A) suggest that the intent is not to require submittal of all forms with a renewal application.</p>	<p>requirements. Once the permittee completes the initial permit package or a renewal application using the standard forms, pages containing information that has not changed from a previous submission may included in subsequent renewal packages. Each subsequent renewal package must be complete, and contain all required forms.</p>
AOGA-15	<p>Although it is not a requirement of 40 CFR 71.5(c), we request that ADEC include on Forms A1 and A4 a location to enter the NAICS code of a source. This could be included in the instructions as an optional entry. The NAICS codes are used as part of the applicability determination for risk management plans (40 CFR 68) and are used in the emissions inventory reporting rule. The NAICS codes are intended to eventually replace the SIC codes (although that may never happen given the number of rules that refer to the SIC codes).</p>	<p><u>Action:</u> form and instructions modified to include NAICS code.</p>

ID	Comment	ADEC Response
AOGA-16	<p>Form A2, items 2, 5, 6, and 7, requires the submission of property area including a plot plan, regional map, and a USGS map. This information is not used to develop the operating permit. While the information may be required to obtain a minor permit or PSD permit, those are Title I permitting actions. Title V permits do not require modeling and knowing the area, terrain, and elevations of the stationary source is not required for permit/rule applicability determinations. We are concerned that ADEC would apparently deem an application incomplete if such information is not included but yet the information is unnecessary to develop the permit. While we understand that ADEC may want this information for different reasons, 18 AAC 50.326 requires that Title V applications include the information contained in 40 CFR Part 71 except as specified in 18 AAC 50.326(b) through (k). 18 AAC 50.326(b) through (k) deal with modifying definitions; stating that 40 CFR 71.5(a)(i)-(ii), (a)(3), (c)(11) and (d) do not apply; specifications of what constitutes an insignificant emission unit; required permit content; and how the permit is to be reviewed and issued.</p> <p>ADEC’s proposed Title V Operating Permit Application Completeness Checklist outlines the requirements of 40 CFR Part 71.5(c). The list of required application elements found in the checklist/§71.5(c) does not include data such as the property area, plot plan, or regional/USGS maps.</p> <p>As noted in 40 CFR 71.5(c)(3)(ii), (iv), (vii), and (c)(5) and adopted in 18 AAC 50; only information required to determine rule applicability or to determine the applicable requirements of the Act are required to be in a Title V application. Therefore requiring property area including a regional map, USGS map, area, terrain, and elevations of the stationary source is not required for Title V permit/rule applicability. We request that ADEC remove all information from the forms that is strictly used for Title I permit applications.</p>	<p><u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications.</p> <p>See response to comment G5.</p> <p>The Department’s authority to require specific information be included for an application to be deemed complete stems from §71.5. While the items in §71.5(a)(2) are required for completeness, §71.5 does not limit completeness to these items. The section also gives the Department authority to develop a standard</p>

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		<p>application package to “best meet the program needs and administrative efficiency.” The Department is also authorized to request additional information under 18 AAC 50.200.</p> <p>In addition, AS 46.14.150(a) states that the applicant “shall submit the required application and other information required by the Department by regulation” and authorizes the Department to require more information than the minimum elements required in §71.5.</p>

ID	Comment	ADEC Response
AOGA-17	Form A2, item 4, requires the maximum hourly and annual capacity to be reported. This information is required where necessary to complete emission calculations and is included with those emission calculations. Requiring this information in Form A2 is repetitive and unnecessary.	<p><u>Action:</u> forms modified to suggest this information as part of the stationary source description, but not require it on Form A2.</p> <p>See response to comment G3.</p>
AOGA-18	In summary of our comments 16 and 17, we request that ADEC delete items 2, 4, 5, 6, and 7 from Form A2.	<p><u>Action:</u> no action.</p> <p>See the response to comments AOGA-16 and AOGA-17.</p>
AOGA-19	Form A2, item 1 bullets 3 and 4, requests the permittee include a description of any proposed modifications that will occur in the future and any proposed construction that the permit will need to address. Operating permits address requirements applicable at the time of permit issuance. Future, hypothetical changes at a stationary source are not required to be included in a Title V permit application. However, we acknowledge that this information would be pertinent if a Title V application was prepared and submitted in concert with a Title I application or if a Title I permit had not yet been issued by ADEC in response to a Title I permit application that had previously been submitted by the permittee. Providing this information would help to tie together the two separate applications. We request a modification to the instructions for Form A2 to include the following prior to the last two bullets under item 1 – “If a Title I construction or minor permit application is submitted along with this Title V application or the owner/operator has previously submitted a Title	<p><u>Action:</u> no action.</p> <p>Including any <u>known</u> proposed modifications in the application will assist the Department with emission calculations and determining applicable</p>

ID	Comment	ADEC Response
	<p>I application and the Department has not yet issued the resulting Title I permit, then provide the following additional information:”</p>	<p>regulations.</p> <p>If a permittee has pre-approved changes authorized under a PAL permit or flexible air permit that are known and pre-planned, or a minor permit application being developed, the applicant should include these changes in the permit application.</p>
<p>AOGA-20</p>	<p>This Form [A3] should be optional, and is unnecessary for what ADEC describes as the “base operating scenario,” a term not referenced in Part 70/71. Permittees can easily describe their very general, “base” scenario in Form A2, Source Description. Form A3 allows for the application to include different alternate operating scenarios that trigger different applicable requirements than to which the source is otherwise subject. Most stationary sources do not require multiple operating scenarios in their Title V permit making this form only applicable to a select few stationary sources. We request that ADEC only require that this form be completed if the stationary source chooses to have more than one operating scenario.</p>	<p><u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications.</p> <p>Sources operating under multiple operating schedules must provide</p>

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		<p>operating schedule information for the Department to determine or regulate emissions.</p> <p>If no specific operating schedule is used in the emission calculations other than the 8,760 hr/yr assumption or as required in §71.5(c)(7), then this section can be marked “not applicable.”</p> <p>If a specific schedule is used to limit emissions, then it should be described here.</p>
AOGA-21	Form A4, item 5, requires the permittee to submit process information in the form of production, fuel usage, and raw material usage. This information, if relevant, is required to complete emission calculations and is included with those emission calculations. Requiring this information in Form	<u>Action:</u> Form A2 has been modified to suggest this

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	A4 is repetitive and not necessary.	information as part of the stationary source description. A renewal application only needs to include a Form A2 if there have been changes to this information since the previous permit (item 3 of Form A4). See response to comment G3.
AOGA-22	Form A4, item 7, requires the permittee to report the number of employees. While it is understood that the definition of a Responsible Official can change depending upon whether a stationary source has more or less than 250 employees, it is not an element required to determine rule applicability and should not be a completeness issue as it is not an application element as described in Comment 16. If there are questions about whether a person claiming to be a Responsible Official, ADEC should handle that designation outside of the Title V application process. If ADEC decides to retain a request for this information, we request that it be included as part of Form A1 or Form A2. Form A4 is intended specifically for permit renewal applications. It seems unusual that ADEC would request this data as part of a renewal application, but not as part of an initial permit application.	<u>Action:</u> Form A2 has been modified to suggest this information as part of the stationary source description. A renewal application only needs to include a Form A2 if there have been changes

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		<p>to this information since the previous permit (item 3 of Form A4).</p> <p>See response to comment G3.</p>
AOGA-23	<p>Form A4 instructions indicate that the current permit as well as any permit addendums issued since the permit was issued should be gathered by the owner or operator. It seems to us that the “current” Title V permit would include all of the permit addendums, making it unnecessary to gather the original permit if it has been amended. We suggest deleting the third bullet at the top of page 1 and amending the first bullet as shown in our redline strikeout edits to this page.</p>	<p><u>Action:</u> no action.</p> <p>Not all minor permits may have been incorporated into the “current” Title V permit as of the date that the renewal application is submitted, so those permit elements should be provided as part of the application package.</p>
AOGA-24 a	<p>Other general issues we have identified on the Form A4 (renewal application) instructions include:</p> <p>a. The opening paragraph says that renewal applications are due twelve (12) months prior to the expiration date of the permit. The correct requirement is no sooner than 18 months and no later than 6 months prior to the expiration date of the permit.</p>	<p><u>Action:</u> modified text to correctly describe the application requirements.</p>

ID	Comment	ADEC Response
AOGA-24 b	b. The second bullet at the top of page 8 says to gather “a compliance certification for the stationary source”. We suggest that it would be most relevant to gather the most recent compliance certification.	<u>Action:</u> modified text instructions for clarity on requirement. In order to create a complete application, the applicant must submit a complete compliance certification as part of the application.
AOGA-24 c	c. The third paragraph on page 8 provides instructions for submitting a renewal application to ADEC. We request that the form also include instructions for submitting a renewal application to EPA. See also our comment 13 for suggestions on how to address this.	<u>Action:</u> instructions modified as suggested. See response to AOGA-13.
AOGA-24 d	d. The fifth paragraph on page 8 provides information about the schedule and process for deeming an application complete, including the potential need to submit an amended application. Since this is information pertinent to any type of application, not just a renewal application, we request that ADEC move this paragraph to page 1 of the Form Series A instructions.	<u>Action:</u> instructions modified as suggested.
AOGA-24 e	e. The instructions for Item 1 of Form A4 indicate that the stationary source fax number is to be included on the form, but there is no place on the form to enter the fax number. There is also no requirement to include the fax number for an initial Title V permit application under Form A1.	<u>Action:</u> instructions modified as suggested.

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	We suggest removal of the instruction to include a fax number for the source.	
AOGA-24 f	f. The instructions for Item 9 of Form A4 on page 9 refer to “18 AAC 50.500”. Since there is no such entry in the rules, we suggest, based on our understanding of the intent, a change to the language so that it states “18 AAC 50, Article 5” instead.	<u>Action:</u> instructions modified as suggested.
AOGA-24 g	g. Items 11 (40 CFR 64) and 12 (40 CFR 68) of Form A4 should be stated on specific forms and instructions that pertain to these rules and as part of an initial permit application, not as requirements that need only be addressed as part of a renewal application.	<u>Action:</u> instructions modified as suggested.
AOGA-24 h	h. Item 20 asks if a request is being made to change “the non-applicable requirement conditions”. We do not understand this instruction. If the requirement is non-applicable, it would not be included as a condition in the permit, unless ADEC is referring to the permit shield condition. Please clarify item 20 instructions and item 20 on the form. Perhaps the instruction and form should refer to the appropriate Form Series C form and request that the entry in item 20 would be to list the emission unit where a change in the non-applicable requirements is to be made in the permit, not the condition.	<u>Action:</u> instructions clarified. Non-applicable conditions may not have been included in the previous permit based on changes to federal rules, for example, RICE MACT.
AOGA-25	AOGA has also suggested changes to the Form Series A instructions and associated forms which we believe better clarify intent. See our proposed edits to the instructions and associated forms included in the redline/strikeout edits provided with these comments.	<u>Action:</u> some modifications incorporated. Due to the volume of edits provided, we are not able to address individual

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		redline comments here. Refer to final forms for modifications incorporated.
AOGA-26	Form B does not distinguish between significant and insignificant emission units. We request that ADEC update the form to allow the permittee to distinguish between significant and insignificant emission units.	<u>Action:</u> Form B has been modified to create a new page for insignificant units. See responses to comments G5 and SLR-14.
AOGA-27	The instructions for Form A4 – Renewal Application, indicate that only Form A4 is required if there are no changes to incorporate into the renewal permit. However, the Form Series B instructions state that “Form Series B must be completed for each initial and renewal application...” AOGA believes that the Form A4 instructions are appropriate for a renewal application, and we have proposed changes to Form B instructions that eliminate the inconsistency, and for renewals, require Form Series B only for emission units that were not identified in the original or most recent Title V application, or that have been modified since the original or most recent Title V permit was issued. We also made appropriate changes to Form B. See our redline/strikeout edits provided with these comments to the forms.	<u>Action:</u> clarified instructions for renewal applications.
AOGA-28	The Form B Series instructions as well as instructions for Form Series C and E include discussions pertaining to a requirement to include “all state and federal standards applicable and non applicable	<u>Action:</u> clarified instructions.

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	<p>to...” indicating that all “must be identified”. (emphasis added) It is not a requirement of the Title V program that a permittee identify all non-applicable requirements. That would be excessive and certainly unnecessary. A literal read of the language in the instructions would be impossible to comply with. The requirement is better stated in the opening paragraph of the section pertaining specifically to identification of non-applicable requirements, where it states that “regulations for which the owner/operator would like a permit shield should be identified”. This is a much better description of the requirement. We request that ADEC rewrite the opening paragraph of the section titled “Applicable and Non-Applicable Requirements” as well as the opening paragraph of the section titled “Reasons for Regulatory Applicability Determinations” to better reflect the intent as stated in the opening paragraph of the section titled “Non-Applicable Requirements”.</p>	<p>ADEC does not intend to require the applicant to identify every non-applicable regulation for the stationary source, but it would be appropriate to identify those regulations which might cast some doubt on their applicability or may initially appear to be applicable and a description of why they are not, similar to the information ADEC places in their Title V permit statements of basis.</p>
AOGA-29	<p>Identification of emission unit specific applicable requirements is currently embedded in the emission unit data Forms B1-B9. This approach causes a great deal of redundancy because many air quality requirements are widely applicable, e.g., the emission standards in 18 AAC 50.055 apply to all fuel burning equipment, and therefore must be repeated for every heater, boiler, engine, and</p>	<p><u>Action:</u> no action. See response to comment G4.</p>

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	<p>turbine at the source. Instead of requiring repetitive entry of the same information for each B1-B9 form and emissions unit, AOGA suggests that ADEC create new “emission unit applicable requirements” forms for each fundamental state and federal standard to be included as part of the Series E forms, along with the “stationary source applicable requirements” Form E1. All emission units subject to the standard would then be listed on the appropriate form. For example, all heaters, boilers, engines and turbines would be listed (based on the EU IDs on Form B) on the form “State of Alaska Fuel Burning Equipment Visible Emissions Standards.” This approach would help the applicant identify applicable standards, and also mirror the format used in the operating permit, where the standard is listed, followed by each emission unit subject to it.</p> <p>For the vast majority of Alaska facilities (for which these forms should be optimally designed to address), there are only a handful of potentially applicable requirements – 18 AAC 50.055(a)-(c), NSPS Subparts Dc, J, Ka, Kb, GG, KKKK, IIII, JJJJ, and MACT Subparts JJJJJ, and ZZZZ. ADEC could create forms for these standards, and also a generic applicable standard form that could be used for all other rules (and Title I requirements) for which a specific form has not been created. This generic form would look very similar or identical to the current applicable requirements form used for all B Series forms B1-B9, which is already generic.</p> <p>Alternatively, ADEC could use the current generic applicable requirements form, but incorporated into the Series E forms, rather than attached to each emission unit. The form would be revised only to allow for the identification (listing) of the emission unit or emission units to which the standard applies.</p> <p>Either approach is workable with AOGA’s proposal that insignificant and significant emission units be listed on Form B, but Series B1-B9 forms only be required for significant emission units. If ADEC agrees with this approach, the stand-alone series of revised applicable requirements forms would allow the identification of applicable requirements for both significant and insignificant emission units by their listing therein.</p>	<p>The Department acknowledges the redundancy of the method chosen but also expects that the burden to the permittee will not be very great because of the relative simplicity of the state emission standards.</p> <p>The Department believes developing individual forms for many NSPS and MACT standards would be overly complex and necessitate an almost complete repeat of each standard due to the large number of individual nuances allowed by each</p>

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		<p>rule. This complexity would make a rule-base approach impractical. Our chosen method allows the applicant to cite only the applicable requirements of each standard, which is much simpler and aids in efficient permit development.</p>
AOGA-30	<p>Generally, Series B forms require data that is not directly used by ADEC to determine rule applicability or estimate emissions. For example, the serial numbers for each emission unit located onsite. Serial numbers are not used for rule applicability, and often are representative of only a component of an emission unit, or a package for which the emission unit is only a part of, not the emission unit itself. AOGA can find no basis for determining an application without this information as incomplete.</p>	<p><u>Action:</u> no action. Serial numbers are requested by ADEC to track changes made at the stationary source and ensure that ADEC has an up-to-date database of the actual emission</p>

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		units at the stationary source.
AOGA-31	<p>The B Form series requires that each emission unit at the source be included in the Title V permit application regardless of whether the unit is insignificant, unregulated, or both. For example, the forms as presently instructed would require very detailed information on small, unregulated tanks that contain volatile organic or petroleum liquids. 18 AAC 50.326 specifically excludes certain insignificant emission units from being required in the application. While 18 AAC 50.326(d)(4) states that an application cannot omit information needed to evaluate fees, emissions from insignificant emission units are accepted by ADEC and industry to be negligible, and the cost of collecting the necessary data to rigorously document actual and potential emissions from insignificant sources and the cost of ADEC to verify the emissions would far out way the revenue ADEC would receive from them. Assessable emissions and fees are collected by ADEC mainly to pay for the Title V permit program. ADEC procedure is to conduct a fee study to determine if the fees collected on assessable emissions cover the cost of the Title V Operating Permit Program. If the fees do not cover the cost of the operating the program, ADEC increases fees to recover the loss. Requiring stationary sources to include, for example, unregulated lubricating oil storage tanks with potential emissions of perhaps a pound or two, that will not even be included in the permit, would not add any value to the Title V permit program, and therefore would not justify the additional cost for ADEC or the permittee. AOGA has suggested changes to the forms such that Forms B1-B9 are only required for each regulated, significant emission unit. The permittee would still need to list each emission unit that is insignificant on an emission rate basis or on a size/production rate basis in Form B.</p>	<p><u>Action:</u> no action.</p> <p>See response to comment G4.</p> <p>18 AAC 50.326(d), (e), (f) and (g) requires insignificant emission units to be included in applications.</p> <p>Those emission units identified as insignificant will not be regulated under the permit.</p> <p>Documenting insignificant emission units in the application supports efficient inspections by limiting potential confusion.</p>
AOGA-32	B Series forms require that a separate form be completed for each emission unit. Many stationary	<u>Action:</u> modified

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	sources have multiple emission units (e.g., heaters) with the same make, model, and emission profile. Completing the same form multiple times with the same information is repetitive and not necessary. The forms should be revised to allow for multiple units to be listed if identical. We acknowledge that other states typically require a separate form for each emission unit, but we suggest and request that ADEC improve upon this approach by simply modifying the form to allow all detailed identifying information (EU ID, tag number, etc.) for each otherwise identical emission unit with exactly the same applicable requirements to be listed on a single form.	instructions to allow identical units to be combined on one form. See response to comment G4.
AOGA-33	Form B1 requires the permittee to report the date installed, serial number, steam production rate, steam pressure, and steam temperature (items 3, 4, 9, 10, and 11). This information is not required for rule applicability and should not be a completeness issue. Both the design rated capacity and maximum hourly firing rate information are unnecessary to evaluate applicability and emissions. ADEC should just require the design capacity, which is used to evaluate NSPS and MACT applicability.	<u>Action:</u> no action. See response to comment G5.
AOGA-34	Although we agree that the firing method should be included in the description of a boiler/heater, Form B1, item 7, requires “additional information needed to adequately describe the firing method”. This information is not required for rule applicability and should not be a completeness issue.	<u>Action:</u> no action. See response to comment G5.
AOGA-35	Fuel usage information required by Form B1, item 12, will be included with the emissions calculations attached to a permit application. A requirement to include that information here is unnecessary and redundant.	<u>Action:</u> no action. See responses to G3 and G5.
AOGA-36	The question regarding waste heat (item 13) is unnecessary to evaluate applicability. If ADEC finds waste heat to be an applicability trigger, ADEC should specify the exact situation where the information is a completeness issue. In the form instructions, ADEC uses “glycol dehydrator heat source” as an example, which is confusing because fuel-fired dehydration unit reboilers typically use	<u>Action:</u> clarified example. See response to comment G5.

ID	Comment	ADEC Response
	direct heat from the heater, not waste heat.	
AOGA-37	The form (items 8 and 9) should be redesigned to require design capacity in either hp for engines, or MMBtu/hr, for turbines, not both. Engine rules base applicability on hp rating, and turbine rules base applicability on heat input.	<u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications. See response to comment G5.
AOGA-38	Form B2 requires fuel usage and maximum hourly firing rate. This information is not typically required to complete emission calculations, but if necessary is included with those emission calculations. Requiring this information in Form B2 is repetitive and not necessary.	<u>Action:</u> no action. See response to comment G5.
AOGA-39	Much of the required information in Form B3 is unrelated to rule applicability or emission calculations (e.g. primary combustion chamber temperature (part of items 10 and 11), gas residency time (part of item 11), maximum flue gas outlet temperature (item 16), incinerator design efficiency (item 19), a diagram of the incinerator (item 21), the energy balance equations for materials incinerated (item 22), etc.). Please revise the form by eliminating all extraneous information, otherwise ADEC will be forced to declare applications missing any required, yet unnecessary data element, to be incomplete. If there are any elements that are pertinent to rule applicability determination for certain (e.g., newer) incinerators which commenced construction after a certain date or dates, then the requirement to provide that data point should be set based on the applicability date of a rule that requires that data and the form should clarify this. It should not be required for older incinerators that are not subject to more recent rules.	<u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications. See response to comment G5.
AOGA-40	Much of the information requested is produced by the EPA TANKS program, and is listed in the	<u>Action:</u> instructions

ID	Comment	ADEC Response
	TANKS emissions output file, which is required to be submitted as part of the application. AOGA sees no reason to base completeness on a transfer of the detailed tank parameters from the EPA TANKS output file to Form B4. Please either delete the form in its entirety, or delete the detailed information that is unnecessary to determine rule applicability (as shown).	modified to accept external data outputs and Excel spreadsheets. See responses to comments G7.
AOGA-41	ADEC should not require emissions estimates from tanks storing low vapor pressure products, such as distillate fuels. Such tanks represent the vast majority of units in Alaska, and are all insignificant, even at bulk storage facilities. ADEC can easily verify the very low emissions using the TANKS program, and a hypothetical case of a very large tank (e.g., 1,000,000 gal) and a very high throughput (e.g. 20,000,000 gal/yr). Emissions from such a scenario, which is grossly excessive, are less than 1 tpy VOC. Virtually all typical distillate tank emissions are less than 0.1 tpy VOC. Distillate storage tanks are also exempt from federal emission standards and have no applicable requirements. We can find no reason for ADEC to require such extensive data on such tanks as part of the permit process.	<u>Action:</u> no action. See responses to comments G5 and SLR-6, -7 and -14.
AOGA-42	Item 5 of Form B4 requires providing the manufacturer of a tank. We believe this is not pertinent to rule applicability and, for tanks, not very useful information even for identifying the tank at a source. We request removal of this data element from the form and suggest that it be replaced with a requirement to enter the material stored in a tank.	<u>Action:</u> instructions modified as suggested.
AOGA-43	Items 10 and 21 of Form B4 require indicating if a tank has a submerged fill pipe and how submerged fill is achieved. We acknowledge that this is relevant information for gasoline tanks subject to NESHAP Subpart CCCCCC, but we do not believe it is relevant for most tanks. We request that ADEC add clarity to the form to identify when certain elements need to be reported, such as in these examples. There is no relevance to this question, for example, to distillate fuel	<u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some

ID	Comment	ADEC Response
	storage tanks.	applications. See response to comment G5.
AOGA-44	We are not aware of any rules that require the information required by item 13 of Form B4 (pipe data) to determine rule applicability, even for above ground storage tanks. We request remove of this and other extraneous requirements as indicated by our redline/strikeout edits of the form provided with these comments. If ADEC believes this information is necessary, we request that ADEC provide specific details in the public record.	<u>Action:</u> instructions modified to indicate “not applicable” may be appropriate for some applications. See response to comment G5.
AOGA-45	This form uses the term “VOC storage tank”. We do not believe that this term is defined in regulation. 18 AAC 50.990 defines “volatile liquid storage tank”, NSPS Subparts K and Ka apply to storage vessels of petroleum liquids, and NSPS Subpart Kb applies to storage vessels of volatile organic liquids. We suggest that the form use the term defined in 18 AAC 50 – “volatile liquid storage tank”.	<u>Action:</u> instructions modified as suggested.
AOGA-46	AOGA has also suggested changes to the Form B Series instructions and to the Form B Series forms which we believe better clarify intent. See our proposed edits to the instructions and associated forms included in the redline/strikeout edits provided with these comments.	<u>Action:</u> some modifications incorporated. Due to the volume of edits provided, we are not able to address individual redline comments

ID	Comment	ADEC Response
		here. Refer to final forms for modifications incorporated.
AOGA-47	Remove all requested data that is unnecessary to deem the application complete as described in Comment 16, and consistent with the comments on Forms B1-B4.	<u>Action:</u> no action. See responses to comments G5 and AOGA-16.
AOGA-48	Remove all requested data that is unnecessary to deem the application complete as described in Comment 16, consistent with the comments on Forms B1-B4. (We have not included all appropriate edits in our redline/strikeout edits of the Form C Series instructions and forms.)	<u>Action:</u> no action. See responses to comments G5 and AOGA-16.
AOGA-49	In conjunction with our request to remove the portions of the B1-B9 forms addressing emission unit applicable requirements and incorporate them into Form Series E, please also move the control device applicable requirements forms to Form Series E.	<u>Action:</u> no action. See response to comment G5.
AOGA-50	AOGA has also suggested changes to the Form C Series instructions and to the Form C Series forms which we believe better clarify intent. See our proposed edits to the instructions and associated forms included in the redline/strikeout edits provided with these comments.	<u>Action:</u> some modifications incorporated. Due to the volume of edits provided, we are not able to address individual redline comments

ID	Comment	ADEC Response
		here. Refer to final forms for modifications incorporated.
AOGA-51	<p>The instructions for Forms D1 and D2 each indicate that emissions from all emission units are to be accounted for in these forms. We request that the instructions and forms distinguish between significant and insignificant emission units (IEUs). IEUs typically do not have an EU ID number and individually have minimal emissions. As commented above, we believe it is unnecessary to require emissions information from individual units that are classified as IEUs based on size or production rate (18 AAC 50.326(g)). However, if ADEC is unwilling to agree to removal of the requirement to document emissions from 18 AAC 50.326(g) IEUs, then we request that the instructions indicate that only one Form D1 be completed to document emissions from all 18 AAC 50.326(g) IEUs identified in the Form Series B forms of the application.</p>	<p><u>Action:</u> forms modified as follows: For insignificant emission units, expected actual annual emissions are only required if the unit is an insignificant unit on an emission rate basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-15). See responses to comments G5 and SLR-14.</p>

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AOGA-52	In conjunction with our previous comment, we also request that ADEC amend the instructions for Forms D1 and D2 to clarify that emissions from any nonroad engines (NREs) at the source should not be included on these forms. Per 18 AAC 50.100, the actual and potential emissions of NREs are not included when determining the classification of a stationary source under AS 46.14.130 (Stationary Sources Requiring Permits) and, as determined by ADEC, emissions of NREs are not to be included when calculating the assessable potential to emit for fees.	<u>Action:</u> instruction clarified. All emissions from the stationary source must be quantified before exclusions are made in the application.
AOGA-53a	Please revise Form D1 by making it a list of the documentation ADEC wants to see in the live Excel emissions calculation spreadsheets. As is, Form D1 is simply an emission unit by emission unit duplication of information already submitted because ADEC requires that all emissions calculations be documented in the application.	<u>Action:</u> instructions modified to accept external data outputs and Excel spreadsheets. See responses to comment G7.
AOGA-53b	In conjunction with the changes to Form D1, and if ADEC still believes that it is necessary to document individual emission unit emissions in the spreadsheets and in a form, the Department could revise Form D2 such that it consolidates forms D1 and D2 by requiring a list of each emission unit (by number) and the emission unit's emissions, followed by a simple summary line at the bottom for total stationary source emissions.	<u>Action:</u> no action. See response to comment AOGA-53a.
AOGA-54	Please delete the requirement to calculate expected actual annual emissions for all units. Significance is based on a unit's two year average actual emissions, not a projection of expected actual emissions. If ADEC believes that the applicant must document actual emissions when classifying an emission unit as insignificant on an emission rate basis, the Department could only	<u>Action:</u> forms modified as follows: For insignificant emission units,

ID	Comment	ADEC Response
	<p>require that actual emissions be presented in such cases, or alternatively, ADEC can address their concerns under 18 AAC 50.326(d)(4) or 18 AAC 50.200. Other than for determining significance, which is only necessary for a small subset of units, rule applicability is not based on actual emissions and therefore there is no basis for ADEC to require the information for the application to be complete. See our suggested revisions to Form D2 shown in the redline/strikeout amendments to the proposed form included with these comments.</p>	<p>expected actual annual emissions are only required if the unit is an insignificant unit on an emission rate basis under 18 AAC 50.326(e) and potential annual emissions exceed 80% of the thresholds in 18 AAC 50.326(e)(1-15).</p> <p>See response to comment G5 and SLR-6, -7 and -14.</p> <p>For existing sources most applicants will have this data available because the permittee is allowed to submit actual emissions as the basis for annual emission fee</p>

ID	Comment	ADEC Response
		<p>requirements.</p> <p>For new applicants, expected actual emissions would be either PTE or “unknown.”</p> <p>The Department is requesting the information to develop permit terms and conditions for an applicant who may be operating close to an enforceable limit and to determine what compliance may be appropriate for such a stationary source.</p>
AOGA-55	<p>Because permit limits are federally enforceable restrictions that are accounted for under the definition of potential emissions we request that ADEC remove from Form D1 the reference to “limitations” in the column heading “before controls/limitations.” The only reason we can determine for ADEC to request pre-control device emissions is to assess the applicability of 40 CFR 64 (Compliance Assurance Monitoring or CAM) to an emission unit and its pollution control device.</p>	<p><u>Action:</u> instructions clarified.</p> <p>The Department requires the emissions</p>

ID	Comment	ADEC Response
	<p>Since any limit other than that of a control device affects the “potential pre-control device emissions”, which must be known to determine CAM applicability, we believe it is appropriate to take such limits into account when assessing the pre-control device potential emissions of a unit.</p>	<p>information in order to assess compliance with regulatory requirements beyond CAM applicability, such as the RICE MACTs requirement to reduce CO emissions (Table 2a to Subpart ZZZZ of Part 63). In order to fully determine compliance, Form D-1 asks for three items:</p> <ol style="list-style-type: none"> 1. Expected annual emissions from an emission unit with all limits or controls in place 2. Unrestricted PTE based on no controls or limits 3. Restricted PTE

ID	Comment	ADEC Response
		based on enforceable controls or limits
AOGA-56	As stated in our previous comment, we believe the only purpose for requesting information on pre-control device potential emissions is to use that information to assess CAM applicability to an emission unit. We do not believe there is any reason to document the pre-control device potential emissions from the entire stationary source. As such, we request that ADEC delete the column from Form D2 titled “Potential Annual Emissions (before controls/limitations)(tons/year)” if our proposed revamp of Form D2 as stated in comment 53 (and shown in our redline/strikeout edits of Form D2) is not agreed upon by ADEC.	<u>Action:</u> instructions clarified. See response to comment AOGA-55.
AOGA-57	AOGA has also suggested changes to the Form D Series instructions and to the Form D Series forms which we believe better clarify intent. See our proposed edits to the instructions and associated forms included in the redline/strikeout edits provided with these comments.	<u>Action:</u> some modifications incorporated. Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications incorporated.
AOGA-58	As discussed previously, we request that ADEC address all applicable requirements under Form Series E rather than on an emission unit-by-emission unit basis in Form Series B.	<u>Action:</u> no action. See response to comment G4.

ID	Comment	ADEC Response
AOGA-59	As discussed previously AOGA requests that ADEC develop forms for widely applicable emission standards. We also request that the ADEC pre-insert stationary source wide applicable requirements that apply to all facilities (e.g., 50.110) into the Stationary Source Applicable Requirements Form.	<u>Action:</u> no action. See responses to comments G4.
AOGA-60	The ADEC should clarify that the emission unit and stationary source applicable requirements forms in this section are not generally required for renewal applications, except for requirements that are not addressed in the most recent Title V permit. Consistent with this approach, the emission unit and stationary source applicable requirements forms in this section would only address Title I permit conditions or recently promulgated rules under NSPS or NESHAP not included in a Title V permit.	<u>Action:</u> clarified instructions to indicate subsequent applications can resubmit previously prepared forms for facility elements that have not changed. The emission unit and stationary source applicability forms will be required for renewal applications. See also response to comment G6.
AOGA-61	Form E5 requires the permittee to submit AMPs or EPA waivers with the renewal permit application. We request that ADEC specify that only AMPs and EPA waivers issued within the previous permit term are required to be included with a renewal permit application. The form should be modified to distinguish between an initial or renewal application.	<u>Action:</u> no action. Each application submission needs need to be a

ID	Comment	ADEC Response
		<p>complete submittal and include all applicable AMPs or EPA waivers on which permit terms and conditions are expected to be based upon, regardless of when issued.</p> <p>See response to comment G6.</p>
AOGA-62	<p>The instructions for Forms E2 and E3 refer to “18 AAC 50.300” and “18 AAC 50.500”. Since there are no such entries in the rules, we suggest, based on our understanding of the intent, a change to the language so that it states “18 AAC 50, Article 3” and “18 AAC 50, Article 5” instead.</p>	<p><u>Action:</u> modified instructions to reflect current regulations.</p>
AOGA-63	<p>The next to last sentence in the first paragraph of the “Background” section of the instructions for Form E2 states that “if a condition has been imposed as a result of a NSR/PSD permit, then the condition may not be changed.” However, as noted in the previous paragraph of the Form E2 instructions, “one-time” requirements such as an initial source test or visible emissions observation or reporting requirement should be “removable” even if it is found in a PSD/NSR permit. In addition, monitoring, recordkeeping, and/or reporting used to determine compliance with a limit in a PSD/NSR permit can be changed if it is more stringent than that required by the PSD/NSR permit, so the “condition” in the permit can be changed in this case. ADEC’s instructions would be clarified if the language in the paragraph used the term “limit” instead of “condition” to describe applicable</p>	<p><u>Action:</u> modified forms as suggested.</p>

ID	Comment	ADEC Response
	requirements from a PSD/NSR permit that cannot be changed. The quote stated above will then be changed to “if a limit has been imposed as a result of a NSR/PSD permit, then the limit may not be changed.” (Note: all of the examples provided on the form instructions are limits, not monitoring, recordkeeping, or reporting requirements.)	
AOGA-64	The five bullets included in the Form E5 instructions appear to have been copied from a Form Series B form and as a result include text that is out of context for Form E5. We have included suggested revisions to these bullets in our redline/strikeout edits of the Form Series E instructions provided with these comments.	<p><u>Action:</u> some modifications incorporated.</p> <p>Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications incorporated.</p>
AOGA-65	AOGA has also suggested changes to the Form E Series instructions and to the Form E Series forms which we believe better clarify intent. See our proposed edits to the instructions and associated forms included in the redline/strikeout edits provided with these comments.	<p><u>Action:</u> some modifications incorporated.</p> <p>Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final</p>

ID	Comment	ADEC Response
		forms for modifications incorporated.
AOGA-66	We suggest and request that ADEC include the introductory language of 40 CFR 71.5(c)(2) adopted by regulation at the top of the checklist to clarify the specific requirements that apply in order to deem an application complete. The language to be inserted is – “To be deemed complete, an application must provide all information required pursuant to 40 C.F.R. 71.5(c), except that applications for permit revision need supply such information only if it is related to the proposed change.”	<u>Action:</u> no action. See response to comment G5.
AOGA-67	The majority of the language used in the checklist is taken directly from 40 CFR 71.5(c) without making changes to the language to provide context within the checklist instead of within the rule. We have made a number of proposed and suggested changes to the checklist to fix this problem. See our proposed edits to the Completeness Checklist included in the redline/strikeout edits provided with these comments.	<u>Action:</u> some modifications incorporated. Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications incorporated.
AOGA-68a	ADEC has included in the checklist some basic information regarding which form(s) contain the required application information. However, we believe some of the direction included by ADEC is incorrect, as follows:	<u>Action:</u> some modifications incorporated.

ID	Comment	ADEC Response
	a. The second and fourth bullet identified under §71.5(c)(3) – Emissions-Related Information appears to be found in Form Series D, not in Form Series B as indicated on the checklist;	Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications incorporated.
AOGA-68b	b. The fifth bullet identified under §71.5(c)(3) – Emissions-Related Information pertains to identification of air pollution control equipment. This is done in Form Series C, not Form Series B;	
AOGA-68c	c. The checklist indicates that Form E1 includes the information required under 40 CFR 71.5(c)(4) – Air Pollution Control Requirements. However, we believe the checklist should instead refer to Form Series C here;	
AOGA-68d	d. ADEC has not identified which form(s) address the general requirement of 40 CFR 71.5(c)(5) – Other Specific Information. It would be helpful to the applicant and the ADEC personnel reviewing the completeness of an application if the checklist identified the applicable form(s) that address this required application element;	
AOGA-68e	e. The checklist indicates that the requirements of §71.5(c)(6) – Exemptions is found on Form E5. §71.5(c)(6) requires that the applicant include an explanation of any proposed exemptions from otherwise applicable requirements. We do not see this as being part of Form E5.	
AOGA-68f	f. Form A3 does not appear to address the requirement under 40 CFR 71.5(c)(7) to provide additional information to “define permit terms and conditions implementing §71.6(a)(10) [emissions trading] or §71.6(a)(13) [operational flexibility]”. Form A3 only addresses alternate operating scenarios under §71.6(a)(9);	
AOGA-68g	g. The checklist indicates that Form Series E includes the requirements of §71.5(c)(8) – Compliance Plan as well as §71.5(c)(9) – Compliance Certification. However, we do not find in any Series E form the required compliance plan information. In fact, we do not find anywhere in the application a place to make either of the required statements under §71.5(c)(8) that must be	

ID	Comment	ADEC Response
	<p>made for requirements for which the source is in compliance and for requirements that will become effective during the permit term. Further, we do not find any forms in the application package that address submittal of a compliance plan and schedule for requirements for which a source is not in compliance at the time of permit issuance;</p>	
AOGA-68h	<p>h. The last two bullets under §71.5(c)(9) – Compliance Certification (i.e., a schedule for submission of compliance certifications during the permit term and a statement indicating the source’s compliance status with any applicable enhanced monitoring and compliance certification requirements of the Act) do not appear to be included on any forms.</p> <p>Frankly, though, we are not sure what the last bullet is referring to as far as the required compliance status is concerned;</p>	
AOGA-68i	<p>i. The checklist addresses the timeliness of an initial application under 18 AAC 50.326(c) and AS 46.14.150, but does not address timeliness for permit renewal applications under 40 CFR 71.5(a)(1)(iii). We have added proposed language to the draft checklist in our redline/strikeout edit of the checklist included with these comments;</p>	
AOGA-68j	<p>j. We do not believe that the last bullet under the “Timely Application” section of the checklist is relevant in the context of the checklist and we propose that it be deleted. If ADEC elects not to delete this bullet, it should be clarified as it is difficult to understand, especially in the context of a checklist;</p>	
AOGA-68k	<p>k. The “Fees” section of the checklist should be supplemented to include instructions on where to find in the regulations information on the required fee retainer to be submitted with an application. We believe that the “retainer fee” referenced by this section of the checklist is required only when submitting an application to administratively amend a Title V permit (per 18 AAC 50.400(f)). There does not appear to be a requirement to submit a retainer for any other</p>	

ID	Comment	ADEC Response
	types of Title V permit applications, so the checklist as currently written is misleading;	
AOGA-68l	l. The information regarding “Confidentiality of Information” indicates that the permittee may request confidentiality of submitted information. Please add this to Form A1 and/or Form A4 and their respective instructions. We do not see that these or any other forms in the application package provide a place for the applicant to make this request;	
AOGA-68m	m. The final statement of the checklist pertaining to records that are considered to be public documents does not seem relevant for a checklist. However, the statement, which is from AS 46.14.525, might be very appropriate as part of the “Introduction to Alaska Title V Permitting” section of the Form Series A instructions. If ADEC elects not to remove this final statement, we request that ADEC review the language of AS 46.14.525 and correct the typographical errors found in the checklist language.	
AOGA-69	AOGA has suggested additional changes to the Completeness Checklist which we believe better clarify its intent and context and to correct typographical errors. See our proposed edits to the Completeness Checklist included in the redline/strikeout edits provided with these comments.	<p><u>Action:</u> some modifications incorporated.</p> <p>Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications incorporated.</p>
AOGA-70	ADEC has indicated in the instructions pertaining to current compliance status responses to enter	<u>Action:</u> modified

ID	Comment	ADEC Response
	<p>“in” or “out”. The question on the various forms (“Currently in Compliance?”) suggests a “yes or no” response, not “in” or “out”. We suggest that ADEC revise the form instructions accordingly. In most cases, we have deleted this particular instruction as part of our redline/strikeout edits to the proposed forms, but for situations where ADEC elects to retain this instruction, we suggest this change.</p>	<p>forms to “yes” or “no” as suggested.</p>
AOGA-71	<p>We request that the application package include instructions on the following –</p> <ul style="list-style-type: none"> a. How to use the application forms and which form to use to request that multiple Title V permits be issued for a single stationary source as allowed under AS 46.14.190(b). b. Where and how to propose source-specific revisions to Standard Operating Permit Conditions found in 18 AAC 50.346 and the basis for use of the proposed language instead of the standard condition. Is this something that might be included in Form E3? If so, please clarify. We further request that ADEC provide instructions as to what types of revisions to standard conditions will be considered by ADEC. 	<p><u>Action:</u> clarified instructions.</p>
ENTRIX-1	<p>Title V Application Checklist: Below are suggested revisions:</p> <ul style="list-style-type: none"> a. Change the subheading “Form Series D” in the 2nd Section (for 71.5(c)(3) Emissions-Related Information) to Form Series B and D”. b. Change the subheading “Form Series E1” in the 3rd Section (for 71.5(c)(4) and 71.5(c)(5)) to “Form Series C and E1”. c. Add 18 AAC 50.326(d), (e), and (h) for information required for Insignificant Emission Units. Use “Form Series B, D and E” as subheading for this section. 	<p><u>Action:</u> some modifications incorporated.</p> <p>Due to the volume of edits provided, we are not able to address individual redline comments here. Refer to final forms for modifications</p>

ID	Comment	ADEC Response
		incorporated.
ENTRIX-2	Title V Application Submittal Instructions: In Table A, Series E Forms row, under Attachments and Supporting Documents column, add “E5 - Alternative Monitoring Procedures (AMP) Form”.	<u>Action:</u> made suggested change.
ENTRIX-3	Form A1-R: ENTRIX suggests adding a section for “Brief Description of Supplemental Information or Application Revision” in the form and use the same as an additional bullet in the instructions for Form A1-R under Form Series A Instructions document. This will give the reviewer a quick overview of what application modification is being requested.	<u>Action:</u> made suggested change.
ENTRIX-4	<p>Permit Renewal and Modification Applications: Form A-4 (for permit renewal and modification) items 2, 8 – 10, 13, and 14 indicate that Series Forms A, B, C, D, and E are to be completed only if there were any new, modified, or reconstructed emission unit or pollution control equipment, changes in the stationary source general information or operating scenario, applicable requirements, and/or emissions. Furthermore, in the instructions page for Form A-4, it also states the following: “At a minimum, the owner or operator shall submit Form A4...”, “If there are no significant changes to the permit, the owner or operator can simply submit Form A4, a compliance certification, and an edited copy of the current permit to request any administrative or minor permit changes”, and “Instead of listing all of the requested changes identified in items 10, and 16 through 21, the owner or operator may attach an edited copy of the permit showing any requested changes... On Form A4, simply write “see attached permit” for the items that are addressed in the edited permit”. These all indicate that appropriate forms from Series A, B, C, D, and E are to be submitted only as needed.</p> <p>However, Form Series B Instructions state “Form Series B must be completed for each initial and renewal application and for each emission unit at the stationary source”. (Emphasis in bold text provided.) Such statement contradicts with the instructions in Form A-4 as it connotes submittal of all documents that may have already been submitted in the previous application documents, whether they are relevant or not to the new modifications requested in the permit renewal or modification.</p>	<u>Action:</u> clarified instructions that each application needs to be a complete standalone document.

ID	Comment	ADEC Response
	<p>Therefore, ENTRIX suggests the following revisions under the Form Series B Instructions, for clarification:</p> <ul style="list-style-type: none"> a. Revise the last sentence of the first paragraph, as follows: Form Series B must be completed for each initial and renewal application and for each emission unit at the stationary source.” b. Add the following sentence in the second paragraph, after “The second page should be used to indicate...”: For permit renewal or modification, Form B#’s are required only for new, modified, or reconstructed emission units. <p>ENTRIX believes that it is not ADEC’s intention to require redundant information and unnecessary paperwork from the applicant. As stated in Form A-4 instructions for application for permit renewal or modification, completed Form A4 along with a detailed description of modifications made and relevant supporting documentations should be sufficient. A summarized version would be more efficient and effective, unless there have been relevant modifications made on the operational activities and emission units in the stationary source.</p>	
ENTRIX-5	<p>Form B. In the first page for “New, Modified, Previously Unpermitted, Replaced, Deleted”, add an additional column in the form for other supplemental information such as what unit was replaced; dates modified or ceased operation; why a unit is added; and other noteworthy information.</p> <p>For a more organized document sorting, ENTRIX suggests adding a page dedicated only for insignificant emission units with similar header as the second page (for permitted emission units that have not been modified), except remove the Emission Unit ID Number column but add Basis for Insignificant Status column.</p>	<u>Action:</u> made suggested change.
ENTRIX-6	<p>Form B#. To reduce paper bulk and allow more efficiency in reviewing the documents, these forms should be modified so that similar emission units with similar requirements can be entered in the same page, instead of entering the same information in so many pages.</p>	<u>Action:</u> instructions modified to indicate “not applicable”

ID	Comment	ADEC Response
	<p>The information required for each emission unit is excessive, redundant, and not really useful, such as in the case of Tanks (4-5 pages of information) and other emission units that are generally insignificant. We don't think that all insignificant emission units need individual B forms. Note that under 18 AAC 50.326(d), an applicant for a Title V permit is not required to provide all the information called for in the proposed Form B#'s. In addition, instructions for Forms D1 and D2 also require submission of supporting documentation showing calculation methodology, emission factors, and all assumptions, which should be sufficient information for insignificant emission units.</p> <p>Too much paper work means that more and more applications will be deemed incomplete because the data is not known or not really needed for drafting a permit. ENTRIX suggests revising the forms to only request the regulatory information.</p>	<p>may be appropriate for some applications.</p> <p>See response to comment G3.</p>
ENTRIX-7	<p>Form D1. Similar to Comment No. 6 above, Form D1 should be modified to allow entry of similar emission units with similar emissions information in the same page, instead of entering the same information in so many pages. Also add estimated amounts of GHG CO₂e potential to emit. However, for insignificant emission units, we do not think that these units need individual D forms (Form D1); submission of supporting documentation showing calculation methodology, emission factors, and all assumptions should be sufficient.</p>	<p><u>Action:</u> modified forms to include GHG emissions.</p> <p>See response to comment G4.</p>
ENTRIX-8	<p>Form D2, 2nd Table. ENTRIX suggests itemizing the rows by "Significant Emission Units" and "Insignificant Emission Units" and add a row for GHG CO₂-e and Overall Totals.</p>	<p><u>Action:</u> made suggested change.</p>
ENTRIX-9	<p>Form D Instructions. If the Department agrees with suggestions in items 7 and 8 above, modify the Form D Instructions accordingly.</p>	<p><u>Action:</u> made suggested change.</p>
ENTRIX-10	<p>Effective Date. ENTRIX suggests delaying the effective date for the implementation of the proposed Title V application forms to at least six months after final adoption into the 18 AAC 50 regulations. This would give the applicants ample time to prepare and submit their application</p>	<p><u>Action:</u> Use of the forms will not become mandatory</p>

ID	Comment	ADEC Response
	documents in a timely manner following the new Title V application forms, as well as, to avoid unnecessary revisions (which may cause untimely submittal and additional expenses) for those that have already started preparing application documents.	until six months after the effective date of the regulations. See response to comment G2.