



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

Department of Environmental
Conservation

DIVISION OF AIR QUALITY
Air Permits Program

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January 30, 2017

Subject: Inclusion of Emissions from Worker Housing Units in Air Quality Permits

Dear :

This letter addresses how worker housing owned or operated by a stationary source is to be addressed in air quality permits. The Alaska Department of Environmental Conservation (ADEC) has not consistently included emissions from fuel-burning emission units (EUs) that directly support worker housing units at or near a stationary source when assessing a permit applicability determination. ADEC's inconsistency has led to different monitoring, record-keeping, and reporting requirements between various Permittees for their worker housing EUs.

To correct this inconsistency, ADEC intends to treat worker housing consistent with this letter in all future permit decisions. We encourage all Permittees that provide worker housing to carefully review the information provided in this letter to see if they need to take additional steps to maintain or revise their permitting strategies.

Worker housing may be a support activity

Support activities are part of the stationary source for permitting purposes. According to the Region 10 office of the U.S. Environmental Protection Agency, worker housing owned or operated by a stationary source constitutes a support activity for that stationary source if 50 percent or more of the services provided by the housing units are used to support the stationary source. When worker housing constitutes a support activity, its emissions must be included in the potential-to-emit calculations for the permitted source. These calculations may affect the classification of the source in a new source review permit application or affect a permit avoidance strategy.

ADEC believes that most worker housing provided by Alaskan Permittees constitute support activities for their stationary source. ADEC will treat all worker housing as support activities unless the Permittee demonstrates to ADEC's satisfaction that their worker housing is not a support activity (see below). All Permittees that provide housing for their employees should assess whether the housing emissions have been properly included in their past permit applications and permitting strategies. Permittees who find that worker housing emissions were not correctly included in their prior permit actions should contact ADEC for guidance on how to correct the error.

For stationary sources with an Owner Requested Limit (ORL) to avoid a permit classification, the Permittee should assess how worker housing emissions would affect the avoidance strategy of the ORL. Permittees may need to apply to revise their ORL to ensure their limit actually avoids the permit classification.

Clean Air

If you think worker housing is not a support activity

Permittees who believe their worker housing is not a support activity should demonstrate this in their next permit application, along with any resulting changes to their permit. The demonstration must show that less than 50 percent of the beds being provided are dedicated to workers and contractors. To make this demonstration, the Permittee would need to describe:

- where the housing is located in relation to the stationary source;
- who they allow to lodge at their housing;
- the maximum number of beds allocated to employees/contractors;
- the total bed count;
- the resulting ratio of employee/contractor beds to total beds; and
- how the Permittee advertises the availability of lodging, if at all.

Applicants for new stationary sources would need to provide this same type of information in their application to show that their worker housing is not a support activity.

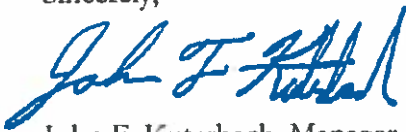
Emissions from insignificant emission units still count toward permit applicability

ADEC recognizes that some worker housing EUs may qualify as “insignificant EUs” under the Title V permit program. However, all emissions at the stationary source, including emissions from insignificant EUs, need to be included when determining a stationary source’s permit classification or developing a permit classification avoidance strategy.

Contact us for further information

If you have any questions as to how the information provided in this letter may affect your stationary source, please contact the Anchorage air permit supervisor (Patrick Dunn), or the Juneau air permit supervisor (Jim Plosay). Mr. Dunn may be contacted at: (907) 269-7582, or patrick.dunn@alaska.gov. Mr. Plosay may be contacted at (907) 465-5561, or jim.plosay@alaska.gov.

Sincerely,



John F. Kuterbach, Manager
Air Permits Program

cc: Jim Plosay, ADEC/APP/Juneau
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