

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OWNER REQUESTED LIMIT

Owner Requested Limit: AQ1669ORL01
Rescinds: PAEL No. AQ0852PL101

Draft Date – July 14, 2021

Owner/Operator: Crowley Fuels LLC
201 Arctic Slope Avenue, Anchorage, AK 99518

Stationary Source: Bethel Bulk Fuel Terminal

Location: Latitude: 60° 47.1' North Longitude: 161° 40.7' West

Project: Installation of VOC Controls and Increased Gasoline Throughput

Permit Contact: Carrie Godden
Carrie.Godden@crowley.com
(907) 777-5461

The above-named owner/operator has submitted a complete request for an owner requested limit (ORL) under 18 AAC 50.225(b) for the Bethel Bulk Fuel Terminal. The Alaska Department of Environmental Conservation (Department) approves the ORL to restrict the stationary source's volatile organic compounds (VOC) potential to emit (PTE). The ORL allows Crowley Fuels LLC to avoid the requirements for a Title V operating permit. The Department certifies that the ORL is effective as of the date noted below. Upon effective date of this AQ1669ORL01, the Pre-Approved Emissions Limit(PAEL) No. AQ0852PL101 issued for the Bethel Tank Farm shall be rescinded.

In accordance with 18 AAC 50.225(f), the owner/operator has agreed to the conditions listed in this ORL.

The owner/operator may revise the terms or conditions of this approval under 18 AAC 50.225(h)(1) by submitting a request under 18 AAC 50.225(b). The owner/operator may request the Department revoke the limit in accordance with 18 AAC 50.225(h)(2). This limit remains in effect until the Department approves a new limit or revokes it.

I understand and agree to the terms and conditions of this approval.

Owner or Operator

Printed Name

Title

Department approval:

James R. Plosay, Air Permit Program Manager

Owner Requested Limit Effective Date

Conditions:

1. **Volatile Organic Compounds (VOC) Owner Requested Limit (ORL), EU IDs 1, 2, and 4.** The owner/operator shall limit the combined VOC emissions from the three gasoline storage tanks, EU IDs 1, 2, and 4 listed in Table 1, to no more than 3.8 tons for any consecutive 12-month period. Demonstrate compliance with this limit by complying with the following:
 - 1.1 Install, maintain, and operate an internal floating roof for each of EU IDs 1, 2, and 4, in accordance with the applicable requirements of NSPS Subpart Kb under 40 C.F.R. 60.112b(a)(1).
 - a. Include a statement in the initial operating report in Condition 5 certifying that each of the IFRs meets the applicable requirements of NSPS Subpart Kb under 40 C.F.R. 60.112b(a)(1) and has been fully operational¹ by the effective date of this ORL.
 - 1.2 Limit the combined gasoline throughput for EU IDs 1, 2, and 4 to no more than 12,000,000 gallons of fuel for any consecutive 12-month period.
 - 1.3 Monitor and record the amount of gasoline transferred from each of EU IDs 1, 2, and 4 each day.
 - 1.4 By the end of each calendar month, calculate and record:
 - a. the combined amount of gasoline transferred from EU IDs 1, 2, and 4 for the previous month; and
 - b. the sum of the last 12 consecutive-month combined amount of gasoline transferred obtained in accordance with Condition 1.4a.
 - 1.5 Report in the operating report as described in Condition 5 the records of the monthly and 12 consecutive-month combined amount of gasoline transferred from EU IDs 1, 2, and 4 obtained in accordance with Condition 1.4 for the period covered by the report.
 - 1.6 If the total combined amount of gasoline transferred, as recorded under Condition 1.4b, exceeds the throughput limit in Condition 1.2, report as excess emissions and permit deviation as specified in Condition 6.
2. **VOC ORL, EU IDs 21, 23, and 27.** The owner/operator shall limit the combined VOC emissions from the North tank farm truck loading and barrel/container fuel dispensing (EU IDs 21 and 23) and marine barge loading dock operations (EU ID 27) listed in Table 1, to no more than 7.9 tons for any consecutive 12-month period. Demonstrate compliance with this limit by complying with the following:
 - 2.1 Install, maintain, and operate a vapor combustion unit (VCU) attached to EU ID 21 in accordance with the applicable requirements of NSPS Subpart XX.
 - a. Include a statement in the initial operating report in Condition 5 certifying that:
 - (i) the VCU has been fully operational by the effective date of this ORL;
 - (ii) the emission testing on the VCU was performed in a timely manner in accordance with 40 C.F.R. 60.8(a); and
 - (iii) the VCU meets the applicable standard of no more than 35 milligrams of total organic compounds (TOC) emissions per liter of gasoline loaded, as required in 40

¹ "Fully operational" means upon completion of all functionality checks and commissioning after IFR installation. "Installation" is complete when the IFR is ready for functionality checks to begin.

C.F.R. 60.502(b) under NSPS Subpart XX, based on the source test conducted under Condition 2.1a(ii).

- 2.2 Employ the management practices listed in 40 C.F.R. 63.11116 (found in National Emission Standards for Hazardous Air Pollutants, Subpart CCCCCC for Source Category of Gasoline Dispensing Facilities) when dispensing gasoline fuel at EU ID 23.
 - 2.3 Employ submerged loading practices as described in 46 C.F.R. 153.282 (as referenced in 40 CFR 63.560(a)(4) Subpart Y) when loading gasoline from EU ID 27 onto marine cargo tanks and vessels.
 - 2.4 Comply with the gasoline throughput limit in Condition 1.2.
 - 2.5 Report as excess emissions and/or permit deviation as specified in Condition 6 if any of the requirements in Conditions 2.1 through 2.4 was not met:
- 3. Notification Requirements.** Should the owner/operator plan to operate any of the storage tanks at the stationary source listed in Table 2, other than EU IDs 1, 2, and 4, to store gasoline or another volatile organic liquid (VOL), the owner/operator shall notify the Department within 30 days of the planned initial operation. The notification shall include the following:
- 3.1 EU ID(s) of the tank(s) to be used to store gasoline or another VOL;
 - 3.2 The date when the operation of the EU in Condition 3.1 will start;
 - 3.3 Fuel type or VOL that will be stored in the tank(s);
 - 3.4 Control equipment to be installed on the EU, if applicable;
 - 3.5 An updated stationary source's PTE, taking into account the additional tank(s) that will be used to store gasoline or another VOL; and
 - 3.6 An application to revise the ORL, as appropriate.
- 4. Recordkeeping Requirements.** Unless otherwise specified in this authorization, keep all records required by this ORL for at least five years from the date of collection.
- 5. Annual Operating Reports.** Submit one certified copy of an **annual operating report** for the stationary source to the Department, Air Permits Program, 610 University Avenue, Fairbanks, Alaska 99709-3643 by February 1 for the preceding calendar year. Certify the report as specified in 18 AAC 50.205 by having the responsible official sign after the following statement, "*Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.*" Include all information required to be in operating reports by other conditions of this permit, for the period covered by the report. Attach copies of all excess emission and deviation forms submitted to Department during the reporting period pursuant to Condition 6.
- 6. Excess Emissions and Deviation Reports.** Report all emissions or operations that exceed or deviate from the requirements of this ORL limit as follows:
- 6.1 In accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report emissions that present a potential threat to human health or safety and excess emissions believed to be unavoidable.
 - 6.2 Report all other excess emissions and deviations:
 - a. within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in Condition 6.2b; and

- b. if a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under condition 6.2a.
- 6.3 When reporting excess emissions and deviations use the Department’s notification form, located in Attachment A of this ORL or the Department’s online form, which can be found at <http://dec.alaska.gov/applications/air/airtoolsweb> using the Permittee Portal option, and provide all information called for by that form.
- 6.4 If requested by the Department, provide a more detailed written report as requested to follow up an excess emissions report.

Statement of Avoided Requirement:

Crowley plans to increase the volume of gasoline sales at the Bethel Bulk Fuel Facility to respond to anticipated market demand in the area, as well as, limit its operations below the criteria pollutant volatile organic compounds (VOC) emissions threshold of 100 TPY to avoid a Title V operating permit under 18 AAC 50.326. Increasing the daily gasoline throughput volume above 20,000 gallons per day will change its classification under federal rules (40 C.F.R. 63 Subpart BBBB and 40 C.F.R. 60 Subparts Kb and XX) from a Gasoline Bulk Plant to a Gasoline Bulk Terminal. As part of this business plan and in compliance with the requirements of the applicable federal rules, Crowley has commenced a retrofit project that includes installation of an IFR that meets the applicable requirements of NSPS Subpart Kb under 40 C.F.R. 60.112b(a)(1) on each of the gasoline storage tanks (EU IDs 1, 2, and 4) and installation of a VCU that meets the applicable TOC emissions standard required in 40 C.F.R. 60.502(b) under NSPS Subpart XX for the North TTLR (EU ID 21). Crowley will be loading gasoline only at EU ID 21. In addition, Crowley is also required to employ management practices when dispensing gasoline fuel at EU ID 23 and submerged marine loading practices in EU ID 27, in accordance with the applicable requirements of 40 C.F.R. 63.11116(a) Subpart CCCCC and 46 C.F.R. 153.282 (as referenced in 40 CFR 63.560(a)(4) Subpart Y), respectively. These upgrades and the ORL requirements will allow Crowley to substantially increase facility-wide gasoline volumes while still limiting VOC emissions to values that are below the Title V operating permit threshold of 100 TPY.

Consistent with the definition of “potential to emit” listed in AS 46.14.990(22), the capacity of the stationary source to emit an air pollutant is verifiable through the monitoring, recordkeeping, and reporting contained in this approval. By limiting the potential to emit of EU IDs 1, 2, 4, 21, 23, and 27 the owner/operator is avoiding the requirement to obtain a Title V permit under AS 46.14.130(c) and 18 AAC 50.326.

Table 1 – EU Inventory Subject to limits

EU ID	Unit Name	Unit Description	Max. Capacity (bbls)	Year Constructed/ Modified
1	Storage Tank #1	Gasoline tank with IFR	20,153	2003/ IFR equipped 2021
2	Storage Tank # 2	Gasoline tank with IFR	20,100	2003/ IFR equipped 2021
4	Storage Tank #4	Gasoline tank with IFR	30,354	2003/ IFR equipped 2021
21	North Tank Truck Loading Rack	Gasoline loading operations with VCU system (John Zink Hamworthy Combustion model: ZT-2XX-0530-1/01/06)	N/A	2003/ VCU equipped 2021
23	North Tank Farm Barrel/Container Fuel Nozzles	Gasoline fuel dispensing nozzles	N/A	2003
27	Marine Barge Loading Dock Operations	Gasoline loading from the marine header into barges	N/A	2004

Table 2 presents details of the EUs, their characteristics, and emissions. Potential emissions are estimated based on the proposed ORLs for the affected fuel storage tanks, tank truck loading and barge loading operations.

Table 2 – Emissions Summary, in Tons per Year (TPY)

EU ID	Description	Maximum Capacity/ Rating	Year Constr./ Modified	Annual throughput/ Maximum Fuel Consumption (gallons/year)	Operating Limits/ Practices/ Restrictions	PTE (TPY) ¹				
						VOC	NO _x	CO	PM-2.5 / PM-10	SO ₂
1	Gasoline Tank, with IFR/ #1	20,153 bbl	2003	3,425,109	12,000,000 gallons/year) ^{1a}	3.80 ^{1a, 1b}	NA	NA	NA	NA
2	Gasoline Tank with IFR/ #2	20,100 bbl	2003	3,416,094						
4	Gasoline Tank with IFR/ #3	30,354 bbl	2003	5,158,797						
3	Jet A Tank/ #3	30,203 bbl	2003	5,254,116	40,000,000 gallons/year (est. max. annual diesel throughput) ^{2d}	0.056 ^{1b}	NA	NA	NA	NA
5	Jet A Tank/ #5	30,301 bbl	2003	5,158,797		0.056 ^{1b}	NA	NA	NA	NA
10	ULSD 2 Tank /22-411	5,783 bbl	1969	1,006,051		0.011 ^{1b}	NA	NA	NA	NA
11	Jet A Tank/ 22-412	21,234 bbl	1970 / 1993	3,693,867		0.040 ^{1b}	NA	NA	NA	NA
12	ULSD 2 Tank / 22-413	7,582 bbl	1972 / 1996	1,318,988		0.014 ^{1b}	NA	NA	NA	NA
13	ULSD 2 Tank /22-414	41,342 bbl	1972	7,191,866		0.077 ^{1b}	NA	NA	NA	NA
14	Jet A Tank/ 22-415	20,345 bbl	1976 / 1996	3,539,269		0.038 ^{1b}	NA	NA	NA	NA
15	Jet A Tank/ 22-416	35,854 bbl	1978	6,237,258		0.066 ^{1b}	NA	NA	NA	NA
16	ULSD 2/ 22-417	22,003 bbl	1967 / 1993	3,827,731		0.040 ^{1b}	NA	NA	NA	NA
18	ULSD 2/ 22-419	15,288 bbl	1967 / 1996	2,659,585		0.029 ^{1b}	NA	NA	NA	NA
6 ⁴	Fuel Storage Tank #22-407	10,459 bbl	1948	Standby Status	None	NA	NA	NA	NA	NA
7 ⁴	Fuel Storage Tank #22-408	15,363 bbl	1953	Standby Status		NA	NA	NA	NA	NA
8 ⁴	Fuel Storage Tank #22-409	8,095 bbl	1958	Standby Status		NA	NA	NA	NA	NA
9 ⁴	Fuel Storage Tank #22-410	9,701 bbl	1958	Standby Status		NA	NA	NA	NA	NA
17 ⁴	Fuel Storage Tank #22-418	15,519 bbl	1967 / 1996	Standby Status		NA	NA	NA	NA	NA
19 ⁴	Fuel Storage Tank #22-420	8,057 bbl	1950's (estimate)	Standby Status Emergency Use Only		NA	NA	NA	NA	NA
20 ⁴	Fuel Storage Tank #22-421	8,057 bbl	1950's (estimate)	Standby Status		NA	NA	NA	NA	NA

EU ID	Description	Maximum Capacity/Rating	Year Constr./Modified	Annual throughput/Maximum Fuel Consumption (gallons/year)	Operating Limits/Practices/Restrictions	PTE (TPY) ¹				
						VOC	NOx	CO	PM-2.5 / PM-10	SO ₂
21	North Tank Truck Loading Rack with VCU (John Zink Hamworthy Combustion model: ZT-2XX-0530-1/01/06) ⁵ , Gasoline ^{1d, 2a, c, & f}	N/A	2003 / VCU equipped 2021	8,678,145 ^{2c}	Operate with VCU ^{1a}	7.9 ^{1a, 1d, 1e, 2, 3}	0.14 ^{1d}	0.36 ^{1d}	0.46 ^{1d}	0.07 ^{1d}
23	North Tank Farm Barrel/Container Fuel Nozzles, Gasoline ^{1c}	N/A	2003	N/A	None		NA	NA	NA	NA
27	Marine Barge Loading Operations, Gasoline ³	N/A	2004	3,321,853	Submerged loading ^{1a}		NA	NA	NA	NA
22	North Tank Truck Loading Rack, Diesel ^{2b}	N/A	2003	12,912,292 ^{2b & d}	None	0.12 ²	NA	NA	NA	NA
24	North Tank Farm Barrel/Container Fuel Nozzles, Diesel	N/A	2003	N/A	None	Negligible ^{1c}	NA	NA	NA	NA
25	South Tank Truck Loading Rack, Diesel ^{2b}	N/A	Pre-1980 / 2011	19,368,438 ^{2b, d, & e}	None	0.18 ^{2c}	NA	NA	NA	NA
26	South Tank Farm Barrel/Container Fuel Nozzles, Diesel	N/A	Pre-1980 / 2011	N/A	None	Negligible ^{1c}	NA	NA	NA	NA
28	Marine Barge Loading Operations, Diesel	N/A	2004	7,719,272	Submerged loading	0.07 ³	NA	NA	NA	NA
29	Shop Boiler (Peerless LC-05, Diesel) ^{1c}	0.615 MMBtu/h	2012	53,436	None	0.01 ^{1c}	0.53 ^{1c}	0.13 ^{1c}	0.09 ^{1c}	0.57 ^{1c}
30	Office Boiler (2000 EK-1, Diesel) ^{1c}	0.12 MMBtu/hr	2000	7,446	None	0.00 ^{1c}	0.07 ^{1c}	0.02 ^{1c}	0.01 ^{1c}	0.08 ^{1c}
31	Weld Shop Boiler (Modine POR185B, Diesel) ^{1c}	0.185 MMBtu/hr	2000 (estimate)	14,629	None	0.00 ^{1c}	0.15 ^{1c}	0.04 ^{1c}	0.02 ^{1c}	0.16 ^{1c}
Total Potential to Emit: 15.4 TPY						12.47	0.89	0.55	0.58	0.88

Notes:

NA means Not Applicable

“Diesel” in this table refers to all distillate products that are below 0.5 lbs/in² of true vapor pressure, typically No. 1, No. 2 ultra-low sulfur diesel, and Jet A

“Gasoline” in this table refers to all products that exert above 0.5 lbs/in² of true vapor pressure; typically 100LL aviation gasoline, and all grades of unleaded gasoline

1. The estimated potential emissions are based on calculations provided in the application, as follows:
 - a. VOC PTEs are calculated based on ORLs required for EU IDs 1, 2, 4, 21, 23, and 27. See Conditions 1 and 2.
 - b. VOC PTE of each fuel storage tank was calculated using EPA's TANKS 4.0 program.
 - c. PTEs for the boilers, EU IDs 29, 30, and 31, were calculated based on appropriate EFs provided in EPA AP 42-Tables 1.3-1, 1.3-2, and 1.3-3 and full-time

- operations.
- d. PTEs for the VCU operations in EU ID 21 were calculated based on:
 - i. For VOC, EF of 35 mg/L per the applicable TOC emissions limit in 40 C.F.R. 60.502(b), Subpart XX.
 - ii. For NO_x and CO, vendor-provided EFs;
 - iii. For SO₂, mass balance equation using EPA's Tier 3 standard for Sulfur content in gasoline of 10 ppmw (23 ppmvd H₂S), conservative assumption of 15 grains H₂S/100 ft³ (696 ppmvd) in Propane (from GPA Liquefied Petroleum Gas Specifications, rev. 1979), and H₂S Density of 0.0895 lb/ft³;
 - iv. For PM, used the EF for Propane in EPA AP 42-Table 1.5-1 (External Combustion Sources) as a conservative assumption since there is no EF specific for gasoline vapors combustion. (Vendor information states that combustion is 100% smokeless, therefore, per EPA AP-42, Chapter 13, the soot level would be represented as 0.)
 - e. VOC PTEs for the gasoline and diesel fuel dispensing nozzles (EU IDs 23, 24, and 26) are assumed negligible. The dispensed volume is small and infrequent such that this activity does not measurably alter the emission calculations, nor require a change to the proposed ORL limits.
2. VOC PTEs for gasoline in North (EU IDs 21) and diesel tank truck loading operations in North and South (EU IDs 22 and 25) were calculated based on the following:
 - a. Gasoline will be loaded only at the North Tank Truck Loading Rack (TTLR), EU ID 21.
 - b. Diesel is loaded at both the North and South TTLRs, EUIDs 22 and 25. Assumed 40% of the diesel loading occurs at the North TTLR and 60% occurs at the South TTLR.
 - c. Projected annual gasoline tank truck loading throughput is calculated by multiplying the tank truck loading racks' total calendar year (CY) 2020 gasoline throughput by a factor of approximately 4. The factor of 4 represents the ratio of the Bethel Bulk Fuel Facility's assumed future maximum gasoline throughput (12,000,000 gallons) to the facility's total CY 2020 actual gasoline throughput (3,108,004 gallons).
 - d. Projected annual diesel tank truck loading throughput is calculated by multiplying the tank truck loading racks' total CY 2020 diesel throughput by a factor of approximately 4. The factor of 4 represents the ratio of the Bethel Bulk Fuel Facility's assumed future maximum diesel throughput (40,000,000 gallons) to the facility's total CY 2020 diesel throughput (9,981,273 gallons).
 - e. Total annual Diesel throughput is estimated at 40,000,000 gallons, approximately 4 times the actual throughput in CY 2020, prorated to match increase in gasoline's annual throughput ORL of 12,000,000 gallons. The following are factors used in the calculations:
 - i. Loading Loss equation (LL [lbs / 1000 gallons] = 12.46 SPM/T) from AP 42-Section 5.2.2.1.1;
 - ii. Saturation factor (0.60) from AP-42 Table 5.2-1;
 - iii. True Vapor Pressure for diesel is 0.008 psi, as provided in AP-42 Table 7.1-2 for Jet A fuel; and
 - f. The 35 mg/L TOC emissions limit in 40 C.F.R. 60.502(b), Subpart XX for the VCU is used in calculating VOC emissions from the North gasoline tank truck loading operations (EU IDs 21). VOC PTE for EU ID 21 is estimated to be 1.27 TPY.
 3. VOC PTEs for barge loading operations (EU IDs 27 and 28) were calculated as follows:
 - a. Calculated by multiplying the total CY 2020 volumes of barge-loaded diesel and gasoline by a factor of approximately 4. The factor of 4 represents the ratio of the Bethel Bulk Fuel Facility's assumed future maximum throughputs (12,000,000 gallons gasoline; 40,000,000 gallons diesel) to the total CY2020 actual throughputs (3,108,004 gallons gasoline; 9,981,273 gallons diesel).
 - b. Because Bethel is located on the Kuskokwim River, most barges are shallow draft barges for upriver service with tank compartment depths 3 to 3.7 meters, yet some of the barge fleet may exhibit depths of up to 7 meters. For gasoline, used the worst-case emission factor from Table 5.2-2 (3.9 lb/1,000 gallons) for "Barges" and vessel tank condition assumed to be "Uncleaned" and dedicated to gasoline service.
 - c. For diesel, there are no EF specific to diesel barge loading operations provided in AP-42 Table 5.2-2; therefore, the Loading Loss equation from AP-42 Section 5.2.2.1.1 was used (see Note 2.e.i above).
 - d. VOC PTE is estimated to be 6.48 TPY for gasoline loading and 0.07 TPY for diesel loading.
 4. EU IDs 6 – 9, 17, 19, and 20 are storage tanks that are currently empty and on standby status, hence, no PTEs for these EUs are included in the table. The owner/operator is required to provide a notification should any of these standby tanks be brought back to active operational status. See Condition 3.
 5. The maximum design capacity of the proposed VCU (EU ID 21) was calculated and determined to be 818 lbs/hr, less than the minor permitting capacity threshold of 1,000 lbs per hour.

Attachment A. Notification Form

Bethel Bulk Fuel Terminal

Stationary Source Name

Crowley Fuels LLC

Company Name

AQ1669ORL01

Air Quality Permit Number.

When did you discover the Excess Emissions/Permit Deviation?

Date: ____ / ____ / ____

Time: ____ : ____

When did the event/deviation occur?

Begin: Date: ____ / ____ / ____ Time: ____ : ____ (please use 24-hr clock)

End: Date: ____ / ____ / ____ Time: ____ : ____ (please use 24-hr clock)

What was the duration of the event/deviation? ____ : ____ (hrs:min) or ____ days

(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for Notification (Please check only 1 box and go to the corresponding section.):

Excess Emissions – Complete Section 1 and Certify

Note: All “excess emissions” are also “permit deviations.” However, use only Section 1 for events that involve excess emissions.

Deviation from Permit Conditions – Complete Section 2 and Certify

Note: Use only Section 2 for permit deviations that do not involve excess emissions.

Deviation from COBC², CO³, or Settlement Agreement – Complete Section 2 and Certify

Section 1. Excess Emissions

(a) **Was the exceedance** Intermittent or Continuous

(b) **Cause of Event** (Check one that applies. Complete a separate form for each event, as applicable.):

- Start Up/Shut Down
- Control Equipment Failure
- Bad fuel/coal/gas
- Other _____
- Natural Cause (weather/earthquake/flood)
- Scheduled Maintenance/Equipment Adjustments
- Upset Condition

(c) **Description**

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance. Attach supporting information if necessary.

(d) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the ORL. Identify each emission limit potentially exceeded during the event and the exceedance.

EU ID	EU Name	Permit Condition Exceeded/Limit/Potential Exceedance

(e) Type of Incident: (Please check all that apply and provide the value requested, if any):

- | | |
|--|---|
| <input type="checkbox"/> Opacity _____% | <input type="checkbox"/> Venting _____(gas/scf) |
| <input type="checkbox"/> Control Equipment Down | <input type="checkbox"/> Fugitive Emissions |
| <input type="checkbox"/> Emission Limit Exceeded | <input type="checkbox"/> Marine Vessel Opacity |
| <input type="checkbox"/> Flaring | |
| <input type="checkbox"/> Other: _____ | |

(f) Corrective Actions:

Describe actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence. Attach supporting information if necessary.

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable? YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235? YES NO

Certify Report (go to end of form)

Section 2. Permit Deviations

(a) **Permit Deviation Type:** (Check all boxes that apply per event. Complete a separate form for each event, as applicable.)

- Emissions Unit-Specific Requirements
- Stationary Source-Wide Specific Requirements
- Monitoring/Recordkeeping/Reporting Requirements
- General Source Test Requirements
- Compliance Certification Requirements
- Standard/Generally Applicable Requirements
- Insignificant Emissions Unit Requirements
- Other: _____

(b) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the ORL. List the corresponding permit condition and the deviation.

EU ID	EU Name	Permit Condition /Potential Deviation

(c) **Description of Potential Deviation:**

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation. Attach supporting information if necessary.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence. Attach supporting information if necessary.

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title _____ Date _____

Signature: _____ Phone number _____

NOTE: *This document must be certified in accordance with 18 AAC 50.345(j). Read and sign the certification in the bottom of the form above.*

Submit this report in accordance with the submission instructions on the Department's Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.

If submitted online, report must be submitted by an authorized E-signer for the stationary source. The person providing the electronic signature must:

- a) use a security procedure, as defined in AS 09.80.190, that the Department has approved; and*
- b) accept or agree to be bound by an electronic record executed or adopted with that signature.*