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October 9, 1997

Mr. Matthew Buell
Tesoro Alaska Petroleum Company
P.O. Box 3369
Kenai, AK 99611-3369

Dear Mr. Buell:

At your request, I am providing the Departments interpretation of 18 AAC 50.300(h)(2) as it relates to volatile organic compounds (VOCs).

18 AAC 50.300(h)(2) was established to specify a type of modification that requires a construction permit under AS 46.14.130(a)(5)(A). The requirement is triggered by increases in air contaminants for which the Department has established an ambient air quality standard in 18 AAC 50.010. Although the Department has established an ambient air quality standard for ozone, and VOCs are considered a precursor to ozone, the Department does not require permittees to account for increases in VOCs when determining the applicability of 18 AAC 50.300(h)(2). Please note that 18 AAC 50.300(h)(3) does require permittees to consider VOCs when determining if a construction permit is needed due to a modification.

Please call if you have any questions.

Sincerely,

John M. Stone, Chief
Air Quality Maintenance Section

JMS/pal (h:\air\jstone\300h2.wpd)

cc: Robert W. Hughes, ADEC/AQM, Juneau
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