

**Alaska Department of Environmental Conservation
Air Permits Program**

**Alyeska Pipeline Service Company (APSC)
Trans Alaska Pipeline System (TAPS) Pump Station 3 (PS-3)**

**STATEMENT OF BASIS
of the terms and conditions for
Permit No. AQ0074TVP02**

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INTRODUCTION

This document sets forth the statement of basis for the terms and conditions of Operating Permit No. AQ0074TVP02.

STATIONARY SOURCE IDENTIFICATION

Section 1 of Operating Permit No. AQ0074TVP02 contains information on the stationary source, as provided in the Title V permit application.

The stationary source (i.e., the Trans Alaska Pipeline System (TAPS) Pump Station 3 (PS-3)) is operated by Alyeska Pipeline Service Company (APSC), and Alyeska Pipeline Service Company (APSC) is the Permittee for the stationary source's operating permit. The SIC code for this stationary source is 4612 -- Crude Oil Pipelines.

The stationary source is a crude oil pumping facility. PS-3 is the northern terminus of Trans Alaska Pipeline System (TAPS), which transports crude oil from the North Slope of Alaska to the Valdez Marine Terminal.

EMISSION UNIT INVENTORY AND DESCRIPTION

Under 18 AAC 50.326(a), the Department requires operating permit applications to include identification of all emissions-related information, as described under 40 C.F.R. 71.5(c)(3).

The emission units at the PS-3 that have specific monitoring, recordkeeping, and reporting requirements are listed in Table A of Operating Permit No. AQ0074TVP02, including two dual fuel-fired boilers, two turbine drivers for pumps and generators, seven diesel I.C. engine drivers, one heater, and one breakout tank. The solid waste incinerator (EU ID 17, 31-PK-1) previously included in initial Title V Operating Permit No. AQ 0074TVP01 has been permanently shut down and will be removed from PS-3. The majority of the emission units operate using gas (commonly called "fuel gas") supplied from the natural gas produced by the North Slope petroleum fields. This fuel gas is supplied to the stationary source via a pipeline. In the event fuel gas is not available, many of the units are also allowed to operate on liquid (distillate) fuel on a limited basis. EU IDs 14 – 16, 20, 21, 24, and 25 operate exclusively on distillate fuel.

Table A of Operating Permit No. AQ0074TVP02 also contains specific information on each of the emission units that are regulated by this permit and provided in the application. The table is provided for informational and identification purposes only. Specifically, the emission unit rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

A summary of the potential to emit (PTE)¹ and assessable PTE is shown in Table F below.

Table F - Emissions Summary, in Tons Per Year (TPY)

Pollutant	NO _x	CO	PM-10	SO ₂	VOC	HAPs	Total
PTE	259	1,078	12	26	359	22.5	1,734
Assessable PTE	259	1,078	12	26	359	0	1,734

The assessable PTE listed under condition 39.1 is the sum of the emissions of each individual regulated air pollutant for which the stationary source has the potential to emit quantities greater than 10 tons per year (TPY). The PTE values in Table F were adjusted to take account of the removal of potential emissions from the solid waste incinerator (EU ID 17, 31-PK-1). The emissions listed in the table are estimates to be used for informational purposes only. The listing of the emissions does not create an enforceable limit to the stationary source.

The emission estimates were provided in the renewal application based on manufacturer’s data, EPA’s AP-42 emission calculations, operational hour and owner requested limits, and mass balance calculations.

HAP estimates were not included in the total in the table above because most HAPs are VOCs. The stationary source is not a major source of HAPs. The highest individual HAP is 8.0 TPY and cumulative HAPs are shown in the table above, as limited by Construction Permit No. AQ0074CPT02.

BASIS FOR REQUIRING AN OPERATING PERMIT

In accordance with AS 46.14.130(b), an owner or operator of a Title V source² must obtain a Title V permit consistent with 40 C.F.R. Part 71, as adopted by reference in 18 AAC 50.040.

Except for sources exempted or deferred by AS 46.14.120(e) or (f), AS 46.14.130(b) lists three categories of sources that require an operating permit:

- A major source;
- A stationary source subject to federal new source performance standards or national emission standards; and
- Another stationary source designated by the federal administrator by regulation.

This stationary source is further classified under 18 AAC 50.326(a) and 40 C.F.R. 71.3(a) as:

¹ *Potential to Emit or PTE* means the maximum capacity of a stationary source to emit a pollutant under its physical or operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source, as defined in AS 46.14.990(23), effective 7/25/08.

² *Title V source* means a stationary source classified as needing a permit under AS 14.130(b) [ref. 18 AAC 50.990(111)].

- Belonging to a single major industrial grouping as defined in Section 302 of the Act, that directly emits or has the potential to emit 100 TPY or more of any air pollutant;
- Containing a source, including an area source, subject to a standard or other requirement under Section 111 of the Act (New Source Performance Standards, NSPS), and not exempted or deferred under AS 46.14.120(e) or (f); and

CURRENT AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

The most recent permit-to-operate issued for this stationary source is Permit to Operate No. 9572-AA010 issued on March 4, 1996. This permit was amended through Construction Permit No. 9872-AC023 issued on December 4, 1998. All stationary source-specific requirements established in this previous permit, as amended through December 4, 1998, are included in this renewal Operating Permit No. AQ0074TVP02, as described in Table G.

Title I (Construction and Minor) Permits

Construction Permit No. 9872-AC023 was issued to the Permittee on December 4, 1998 (in the form of Permit to Operate No. 9572-AA010 Amendment 2). All effective stationary source-specific requirements established in this Title I permit are included in this renewal Operating Permit No. AQ0074TVP02, as described in Table G.

Construction Permit No. 074CP01 was issued on March 11, 2003 to revise allowable fuel gas H₂S content from 17 ppmv H₂S established in Permit to Operate No. 9572-AA010 to 34 ppmv H₂S. This limit no longer appears in this renewal Title V Operating Permit No. AQ0074TVP02, as it has been recently replaced and rescinded by Permit No. AQ0074CPT03 to 150 ppmv, as shown in

Table J. However, the MR&R requirements for the fuel gas sulfur content revised in Permit No. 074CP01 are retained in this renewal Permit No. AQ0074TVP02, as shown in Table H.

Construction Permit No. AQ0074CPT03 was issued on February 14, 2005 to allow authorization for the decommissioning of EU IDs 1 – 10 and 14 – 16 in Permit No. AQ0074TVP01, and installation of EU IDs 18 – 23 as part of the APSC's strategic reconfiguration (SR) at PS-3. Subsequently, Permit No. AQ0074CPT03 replaced and rescinded some conditions from Permit Nos. 9572-AA010 Amendment No. 2 and 074CP01 that were carried forward in the initial TV operating permit to fit the SR scenario. These revisions (except as revised in Minor Permit No. AQ0074MSS01), along with other requirements in Permit No. AQ0074CPT03, are now being carried forward into this renewal Permit No. AQ0074TVP02, as described in Table J.

Construction Permit No. AQ0074CPT02 was issued to the Permittee on October 28, 2005. This permit implemented owner requested emission limits to cap emissions and classify PS-3 as HAP synthetic minor. All stationary source-specific requirements established in this previous permit are included in this renewal Permit No. AQ0074TVP02, as described in Table H.

Minor Permit No. AQ0074MSS01 was issued on October 22, 2007 as a revision to the construction authorization in Permit No. AQ0074CPT03. APSC requested to retain EU IDs 14 –

16, to install EU IDs 24 and 25, and to not install EU IDs 22 and 23. Some of the requirements in Permit No. AQ0074CPT03 are then rescinded and replaced with the conditions in Permit No. AQ0074MSS01. These revisions and all effective stationary source-specific requirements in AQ0074MSS01 are now being carried forward into this renewal Permit No. AQ0074TVP02, as described in Table K.

Title V Operating Permit Application, Revisions, and Renewal History

The Permittee submitted an application for a Title V operating permit on October 1, 1997 and supplements to the application on December 5, 1997, January 26, 1998, and March 6, 2000. On October 1, 2003, the Department issued Title V Operating Permit No. AQ0074TVP01.

The Permittee submitted an application for a renewal to the Title V operating permit on April 24, 2008, with supplements to the application dated July 10, 2008. The Department determined the application was complete on August 14, 2008. The Permittee submitted an amendment to the Title V operating permit renewal application on October 30, 2008 and April 1, 2009. The purpose of the first amendment was to withdraw the Permittee's previous applicability determination on 40 C.F.R. 63 Subpart CCCCCC and also to request for permit shields from the requirements of these subparts. The Department concurred with the Permittee's assessment and, therefore, granted the request in this renewal permit. Upon request of the Department, the Permittee provided relevant additional information by e-mail on February 6 and 25, 2009. On April 1, 2009, APSC provided a second application amendment to withdraw the Permittee's previous applicability determination on 40 C.F.R. 63 Subpart HHHHHH to the stationary source and also to request for a permit shield from the requirements of the subpart. The Department concurred with the Permittee's assessment regarding inapplicability of 40 C.F.R. 63 Subpart HHHHHH. However, the Department did not grant the shield requested for 40 C.F.R. 63 Subpart HHHHHH because there is no prohibition for the stationary source from using MeCl for paint stripping during the life of this permit.

On July 24, 2009, the Department received an e-mail and attached notification letter to EPA from the Permittee regarding the permanent shutdown of the solid waste incinerators from PS-1, 3, and 4. The Permittee also requested deletion of EU ID 17 and all associated monitoring, recordkeeping, and reporting requirements. The Department has granted the request in this renewal permit.

COMPLIANCE HISTORY

The stationary source has operated at its current location since 1977. PS-3 is classified as Prevention of Significant Deterioration (PSD) major because it emits or has the potential to emit 250 TPY or more of a regulated air pollutant. Although the stationary source as a whole is designated as major under PSD, a PSD permit has not been required because the source commenced construction prior to August 7, 1977 (the effective date of the PSD regulations) and has not been modified to a level above PSD emission thresholds since. Review of the permit files, which includes the past inspection reports, indicates the following compliance history.

The Permittee entered into Compliance Order by Consent (COBC) No. 98-472-50-1024 in April 1999 to resolve issues regarding the exceedance of the fuel consumption limit for EU IDs 14 – 16, the change-out of EU ID 16 with a Cummins engine, and the operation of a non-permitted Tioga heater. The COBC requirements were satisfied and the COBC was terminated on February 28, 2000.

More recently, the Department conducted a full compliance evaluation (FCE), which included an on-site inspection on December 12, 2006, covering the period January 1, 2005 through December 31, 2006. This evaluation concluded that the stationary source was in compliance with air quality regulations and permit requirements.

STATIONARY SOURCE-SPECIFIC REQUIREMENTS CARRIED FORWARD

Incorporated by reference at 18 AAC 50.326(j), 40 C.F.R. Part 71.6 defines “applicable requirement” to include the terms and conditions of any pre-construction permit issued under rules approved in Alaska’s State Implementation plan.

Alaska’s State Implementation Plan included the following types of pre-construction permits:

- Permit-to-operate issued before January 18, 1997 (these permits cover both construction and operations);
- Construction Permits issued after January 17, 1997; and
- Minor permits issued after October 1, 2004.

Pre-construction permit terms and conditions include both source-specific conditions and conditions derived from regulatory applicable requirements such as standard conditions, generally applicable conditions and conditions that quote or paraphrase requirements in regulation. These requirements include, but are not limited to, each source-specific requirement established in these permits issued under 18 AAC 50 that are still in effect at the time of this operating permit issuance.

Table G through Table K below list the requirements carried over from Permit-to-Operate No. 9572-AA010 Amendment No 2, Construction Permit Nos. 074CP01, AQ0074CPT02 and AQ0074CPT03, and Minor Permit No. AQ0074MSS01 into Operating Permit No. AQ0074TVP02 to ensure compliance with the applicable requirements.

Table G – Comparison of Permit No. 9572-AA010 Amendment No. 2 (as amended through December 4, 1998 by Construction Permit No. 9872-AC023) to Operating Permit No. AQ0074TVP02 Conditions³

Permit No. 9572-AA010 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
6	Liquid fuel sulfur content limit (0.30 percent)	N/A	Rescinded and replaced liquid fuel sulfur limit to 0.20 percent in Permit No. AQ0074CPT03.
8	Liquid fuel limits: Diesel Electric Generators (EU IDs 14 - 16)	13	Same limits, except changed “fuel per year” to “fuel for any consecutive 12-month period.”
12	Liquid fuel limits: Weils McClain boilers (EU IDs 11 & 12)	11	Carried forward as revised in condition 8 of Permit No. AQ0074CPT03.
13	Liquid fuel limits: Applied Air Systems heater (EU ID 13)	12	Carried forward as revised in condition 9 of Permit No. AQ0074CPT03.
21, and Exhibits C & D.4	Fuel gas sulfur MR&R	10.2 - 10.4	Amended in Permit No. 074CP01.

³ This table does not include all standard and general conditions.

Permit No. 9572-AA010 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
22, Exhibit D.4	Liquid fuel MR&R	10.6 - 10.9	Streamlined sulfur content monitoring requirement based on the more stringent ORL sulfur limit of 0.20 percent.
Exhibit B.G Fuel Quality	Fuel gas H ₂ S content limit: 17 ppmv	N/A	Rescinded and replaced by Permit No. 074CP01 to 34 ppmv, which was subsequently rescinded and replaced by Permit No. AQ0074CPT03 to 150 ppmv.
All other conditions, and requirements from Exhibits A - D	Various air quality permit requirements	N/A	These requirements are now obsolete and have been rescinded and replaced by the conditions in Permit No. 074CP01 (3/11/03); Permit No. AQ0074CPT03 (2/14/05) and Permit No. AQ0074MSS01 (10/22/07) as part of the stationary source's strategic reconfiguration.

Table H – Comparison of Permit No. 074CP01 Conditions to Operating Permit No. AQ0074TVP02 Conditions⁴

Permit No. 074CP01 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
2.2	Avon Turbine monitoring	N/A	Rescinded by Permit No. AQ0074CPT03. Units have been decommissioned.
2.3, 2.6, & 2.7	Fuel gas sulfur monitoring and recordkeeping	10.2 - 10.4	Same limit. Updated sulfur content testing methods. Removed portable H ₂ S analyzer (no longer used as an alternative testing method).
2.5, 3	Fuel Gas H ₂ S limit: 34 ppmv	N/A	Rescinded and replaced by Permit No. AQ0074CPT03 to 150 ppmv.
All other source-specific conditions	Various source-specific air quality permit requirements	N/A	These requirements are now obsolete and no longer in effect.

Table I – Comparison of Permit No. AQ0074CPT02 Conditions to Operating Permit No. AQ0074TVP02 Conditions⁵

Permit No. AQ0074CPT02 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
1	Hazardous Air Pollutant Owner Requested Limit (Tank 130, EU ID 26)	22	Not revised.

⁴ This table does not include all standard and general conditions.

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Permit No. AQ0074CPT02 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
2	Hazardous Air Pollutant Owner Requested Monitoring and Recordkeeping (Tank 130, EU ID 26)	22.1	Did not carry forward conditions 2.2, 2.3, 2.5b, and 2.6a where the Permittee is allowed to “use equivalent methods approved by the Department”. This text was discarded during the Revised Action Plan submitted to EPA on July 15, 2007, as a result of the EPA Audit of the September 2006 Title V Program Review and is not to be used in subsequent permits since it allows a Permittee to bypass the public process for changing monitoring requirements by submitting off-record requests to change monitoring methods.
3	Hazardous Air Pollutant Owner Requested Reporting (Tank 130, EU ID 26)	22.2	Not revised.

Table J – Comparison of Permit No. AQ0074CPT03 Conditions to Operating Permit No. AQ0074TVP02 Conditions⁶

Permit No. AQ0074CPT03 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
1	Authorization to Install EU IDs 18 - 23 for the Strategic Reconfiguration	N/A	Condition was rescinded and replaced by condition 1 of Permit No. AQ0074MSS01 (10/22/07).
2	Owner Requested Limits for Ambient Air Quality Protection – NO _x , SO ₂	N/A	Condition was rescinded and replaced by condition 2 of Permit No. AQ0074MSS01 (10/22/07).
3	Ambient Air Quality Protection Requirements: Fuel Sulfur Limit of 150 ppmv H ₂ S and 0.2 percent sulfur by weight	14	Not revised.
4	Owner Requested Limits to Avoid PSD Major Modification – CO (for EU IDs 18 & 19)	16	Did not carry forward condition 4.3 where the Permittee is allowed to “use other method approved by the Department”. This text was discarded during the Revised Action Plan submitted to EPA on July 15, 2007, as a result of the EPA Audit of the September 2006

⁶ This table does not include all standard and general conditions.

Permit No. AQ0074CPT03 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
			Title V Program Review and is not to be used in subsequent permits since it allows a Permittee to bypass the public process for changing monitoring requirements by submitting off-record requests to change monitoring methods.
5	Source Testing for CO (for EU IDs 18 or 19)	17	Not revised.
5.6	Unit Specific Operating Hour Limits	18	Not revised.
5.7	Obtain Department approval in writing to use another method to calculate allowable operating hours in each Tier.	N/A	Did not carry forward this condition. This text was discarded during the Revised Action Plan submitted to EPA on July 15, 2007, as a result of the EPA Audit of the September 2006 Title V Program Review and is not to be used in subsequent permits since it allows a Permittee to bypass the public process for changing monitoring requirements by submitting off-record requests to change monitoring methods.
6	Owner Requested Limits to Avoid PSD Major Modification – NOx (EU IDs 18, 20, & 21)	N/A	Condition was rescinded and replaced by condition 3 of Permit No. AQ0074MSS01 (10/22/07).
7	Owner Requested Limits to Avoid PSD Major Modification – SO ₂ (EU IDs 18, 20, & 21)	21	Same limits. Added MR&R condition.
8	Permit No. AQ0074TVP01 administrative revision for a condition carried forward from Permit No. 9572-AA0010 Amendment No. 2 - Operating hour limit for EU IDs 11 & 12	11	Not revised.
9	Permit No. AQ0074TVP01 administrative revision for a condition carried forward from Permit No. 9572-AA0010 Amendment No. 2 - Operating hour limit for EU ID 13	12	Not revised.
10 - 27	NSPS Subparts A & GG requirements for EU IDs 18 & 19	24 - 34	Incorporated specific C.F.R. language for applicable requirements.
28 – 29	State VE and PM Emission Standards (EU IDs 18 – 23)	1, 2 – 9	Revised in Permit No. AQ0074MSS01. Used the adopted standard conditions language.

Permit No. AQ0074CPT03 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
30	State Sulfur Compound emissions requirements for EU IDs 18 – 23	10	Similar requirements as revised in Permit No. AQ0074MSS01, except replaced the fuel sulfur content limits with the limits in condition 14.
Table 4	Operating Hour Limit Calculation Spreadsheet	Table E	No revision.

Table K - Comparison of Permit No. AQ0074MSS01 Conditions to Operating Permit No. AQ0074TVP02 Conditions⁷

Permit No. AQ0074MSS01 Condition No.	Description of Requirement	Permit No. AQ0074TVP02 Condition No.	How Condition was Revised
1	Authorization to Install EU IDs 18 – 21, 24 & 25 for the Strategic Reconfiguration	N/A	Emission units are already installed.
2	Owner Requested Limits for Ambient Air Quality Protection – NOx, SO ₂ , PM-10 (EU IDs 18, 20, 21, 24 & 25)	15	Not revised.
3	Owner Requested Limits to Avoid PSD Major Modification – NOx (EU IDs 18, 20, 21, 24 & 25)	20	Same limits. Added MR&R conditions.
4 and 5	State VE and PM emissions requirements for EU IDs 18 – 21.	1, 2 – 9	Used the adopted standard conditions language.
6	State Sulfur Compound emissions requirements for EU IDs 18 – 21.	10	Similar requirements, except replaced the fuel sulfur content limits with the limits in condition 14.
8	Owner Requested Limits to Avoid PSD Major Modification – CO (for EU IDs 24 & 25)	19	Same limits. Added MR&R condition.

⁷ This table does not include all standard and general conditions.

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

The State and federal regulations for each condition are cited in Operating Permit No. AQ0074TVP02. The Statement of Basis provides the legal and factual basis for each term and condition as set forth in 40 C.F.R. 71.6(a)(1)(i).

Conditions 1 - 4 and 9, Visible Emissions Standard and MR&R

Legal Basis: These conditions ensure compliance with the applicable requirements in 18 AAC 50.055(a). 18 AAC 50.055(a) applies to the operation of fuel-burning equipment and industrial processes. EU IDs 1 – 21, 24, and 25 are fuel burning equipment or industrial processes.

U.S. EPA incorporated these standards as revised in 2002 into the State Implementation Plan (SIP) effective September 13, 2007.

Factual Basis: Condition 1 prohibits the Permittee from causing or allowing visible emissions in excess of 18 AAC 50.055(a)(1).

Conditions 2 - 4 MR&R have been adopted into regulation as standard conditions (Standard Condition IX) pursuant to AS 46.14.010(e). The Department added a provision that clarifies the option to continue an established monitoring frequency for renewal permits.

No initial or periodic visible emissions monitoring is required for any unit that is classified as insignificant under 18 AAC 50.326(e). For these units, the Permittee shall meet the requirements under condition 23.

As requested by the Permittee, the following changes were made to the permit during this review:

- 1) Language was added to condition 2.1d for units that do not operate on a consistent basis to indicate that the annual Method 9 observations must be taken between 10 and 13 months after the previous observations or during the next month that the unit operates, whichever is later. Also, condition 2.1d was revised to indicate that for units that operate intermittently, the Permittee is required to perform 18-minute observations annually and conditions 2.1a - 2.1c do not apply.
- 2) Condition 3.1a(ii) was revised to add "if known" as follows: the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate, *if known*) on the sheet at the time opacity observations are initiated and completed;

The qualifier "if known" was added to condition 3.1a(ii) because the Permittee is not required to install fuel or load meters specifically to comply with this condition. However, the Permittee is required to record the exact operating rate (fuel or load consumption rate) on the data sheet, at the time opacity observation is performed, if this information is available for an individual unit from a fuel or load meter (or other means). As such, for a unit subject to this requirement that does not have an individual fuel or load meter, the Permittee shall estimate the operating rate and record it on the data sheet at the time opacity observation is performed.

The standard operating condition for some equipment (e.g., fire water pumps and cranes) is not steady state and therefore likely to be variable during the observation. For such equipment, the Permittee may refer to the estimated load recorded under condition 3.1a(ii) as "online" or "idle".

Beyond as noted above, the Department has previously determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emission unit or stationary source operational or compliance factors indicate the unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions as modified meet the requirements of 40 C.F.R. 71.6(a)(3).

Gas Fired:

Monitoring - The monitoring of gas fired emission units for visible emissions is waived, i.e. no source testing will be required. The Department has found that natural gas fired equipment inherently has negligible PM emissions. However, the Department can request a source test for PM emissions from any smoking equipment.

Reporting - The Permittee must certify that only gaseous fuels are used in the equipment.

Liquid Fuel-Fired:

Monitoring – The visible emissions shall be observed by Method-9 plan as detailed in condition 2.1. The Permittee has opted not to use the Smoke/No Smoke plan, so this option has been removed from the permit. Corrective actions such as maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

Recordkeeping - The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

Reporting - The Permittee is required to report: 1) emissions in excess of the federal and the State visible emissions standard and 2) deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the stationary source operating report.

Dual Fuel-Fired:

For EU ID 18, as long as it operates only on gas, monitoring consists of an annual certification that only gaseous fuels were used in the equipment. When this unit operates on a backup liquid fuel for more than 400 hours in a calendar year, monitoring as detailed in condition 9 is required for that unit in accordance with Department Policy and Procedure No. AWQ 04.02.103, Topic # 2, 10/8/04. When this unit operates on a backup liquid fuel for less than 400 hours in a calendar year, monitoring for that source consists of an annual certification of compliance with the opacity standard. The 400-hour trigger for additional monitoring applies to each individual unit and not as a combined total for all units.

Insignificant Emission Units:

For EU IDs 11, 12, 13, and 21, no visible emissions monitoring is required because these units are insignificant emission units. EU IDs 11 and 12 are insignificant based on size or production rate, while EU IDs 13 and 21 are insignificant based on actual emissions. These

units have permit conditions that limit their hours of operation: condition 11 for EU IDs 11 and 12, condition 12 for EU ID 13, and condition 15 for EU ID 21. As long as the units do not exceed these limits, they are insignificant and no monitoring is required in accordance with Department Policy and Procedure No. AWQ 04.02.103, Topic # 3, 10/8/04. The Permittee must annually certify compliance under condition 68 with the opacity standard.

Conditions 5 - 9, Particulate Matter (PM) Standard and MR&R

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.055(b). This requirement applies to operation of all industrial processes and fuel burning equipment in Alaska. EU IDs 11 – 21, 24, and 25 are fuel-burning equipment. These PM standards also apply because they are contained in the federally approved SIP effective September 13, 2007.

Factual Basis: Condition 5 prohibits emissions in excess of the state PM (also called grain loading) standard applicable to fuel-burning equipment and industrial processes. The Permittee shall not cause or allow fuel-burning equipment to violate this standard.

MR&R requirements are listed in conditions 6 through 9 of the permit.

Gas Fired:

For gas fired emission units, MR&R conditions are Standard Condition VIII adopted into regulation pursuant to AS 46.14.010(e). The Department determined that these standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 C.F.R. 71.6(a)(3).

Although periodic PM monitoring of gas-fired units is waived, the Department has the discretion to request a source test for PM emissions from any fuel burning equipment under 18 AAC 50.220(a) and 345(l).

Liquid Fuel-Fired:

For liquid fuel-fired units, the MR&R conditions are Standard Condition IX adopted into regulation pursuant to AS 46.14.010(e). The Department determined that these standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 C.F.R. 71.6(a)(3).

The Permittee must establish by actual visual observations which can be supplemented by other means, such as a defined Stationary Source Operation and Maintenance Program that the stationary source is in continuous compliance with the State's emission standards for particulate matter.

Dual Fuel-Fired:

For EU ID 18, as long as it operates only on gas, monitoring consists of an annual certification that only gaseous fuels were used in the equipment. When this unit operates on a backup liquid fuel for more than 400 hours in a calendar year, monitoring as detailed in condition 9 is required for that unit in accordance with Department Policy and Procedure No.

AWQ 04.02.103, Topic # 2, 10/8/04. When this unit operates on a backup liquid fuel for less than 400 hours in a calendar year, monitoring for that unit consists of an annual certification of compliance with the particulate matter standard. The 400-hour trigger for additional monitoring applies to each individual unit and not as a combined total for all units.

Insignificant Emission Units:

For EU IDs 11, 12, 13, and 21, no particulate matter monitoring is required because these units are insignificant emission units. EU IDs 11 and 12 are insignificant based on size or production rate, while EU IDs 13 and 21 are insignificant based on actual emissions. These units have permit conditions that limit their hours of operation: condition 11 for EU IDs 11 and 12, condition 12 for EU ID 13, and condition 15 for EU ID 21. As long as the units do not exceed these limits, they are insignificant and no monitoring is required in accordance with Department Policy and Procedure No. AWQ 04.02.103, Topic # 3, 10/8/04. The Permittee must annually certify compliance under condition 68 with the particulate matter standard.

Condition 10, Sulfur Compound Emissions

Legal Basis: This condition requires the Permittee to comply with the sulfur compound emission standard for all fuel-burning equipment and industrial processes in the State of Alaska. EU IDs 11 – 16, 18 – 21, 24, and 25 are fuel-burning equipment and industrial processes. These sulfur compound standards also apply because they are contained in the federally approved SIP effective September 13, 2007.

Factual Basis: The condition requires the Permittee to comply with the sulfur compound emission standard applicable to fuel-burning equipment. The Permittee may not cause or allow the affected equipment to violate this standard.

Sulfur dioxide comes from the sulfur in the fuel (e.g. coal, natural gas, fuel oils).

Liquid Fuels:

Fuel containing no more than 0.75 percent sulfur by weight will always comply with the emission standard (i.e., No. 2 diesel fuel is 0.5 percent by weight or less by grade specification). The Department modified Standard Condition XI MR&R to serve to be adequate for the 0.20 percent limit as listed in condition 14.2. The MR&R conditions have been streamlined based on the more stringent sulfur limits of 0.20 percent rather than have two sets of MR&R. The Department also corrected condition 10.7 to replace the text “...method listed in 18 AAC 50.035 or an alternative method approved by the Department” with “...method listed in 18 AAC 50.035(b)-(c) and 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1)”. The text “...or an alternative method approved by the Department” was discarded during the Revised Action Plan submitted to EPA on July 15, 2007, as a result of the EPA Audit of the September 2006 Title V Program Review. This text is not to be used in subsequent permits since it allows a Permittee to bypass the public process for changing monitoring requirements by submitting off-record requests to change monitoring methods.

Beyond as noted above, the Department has previously determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emission unit or stationary source operational or compliance factors indicate the unit-specific or

stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions as modified meets the requirements of 40 C.F.R. 71.6(a)(3).

Gaseous Fuels:

Fuel gas sulfur is measured as hydrogen sulfide (H₂S) concentration in ppm by volume (ppmv). Calculations⁸ show that fuel gas containing no more than 4000 ppm H₂S will comply with this emission standard at stoichiometric or excess air combustion conditions. This is true for all fuel gases. Equations to calculate the exhaust gas SO₂ concentrations resulting from the combustion of fuel gas were not included in this permit. Fuel gas with an H₂S concentration of even 10 percent of 4000 ppm is currently not available in Alaska and is not projected to be available during the life of this permit.

The Permittee is currently limited to 150 ppmv H₂S as listed in condition 14.1. A review of recent FOR data shows compliance well within this limit at 20~30 ppmv so quarterly (once each three months) monitoring was imposed. The Department used these owner requested H₂S limits to assure compliance with the State standard of 500 ppm for sulfur compound emissions. Condition 10.2b requires the Permittee to conduct analysis once every three months for the fuel gas H₂S concentration using either ASTM D4810, D4913, or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) and 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

Conditions 11 - 22, Pre-Construction Permit Requirements

Legal Basis: The Permittee is required to comply with all effective stationary source-specific requirements that were carried forward from previous EPA PSD permits, SIP approved permits to operate issued before January 18, 1997, SIP approved construction permit(s), SIP approved minor permits, operating permits issued between January 18, 1997 and September 30, 2004, or owner requested limits established under 18 AAC 50.225. These requirements include Best Available Control Technology limits, limits to ensure compliance with the attainment or maintenance of ambient air quality standards or maximum allowable ambient concentrations, and owner requested limits. State pre-construction requirements apply because they were originally developed through case-by-case action under a federally approved SIP or approved Operating Permit program. EPA approved the latest SIP effective September 13, 2007.

Factual Basis: Conditions 11 - 13 incorporate owner requested limits to protect ambient air and avoid PSD major modification as developed in Permit to Operate No. 9572-AA010 Amendment No. 2 (revised through Construction Permit No. 9872-AC023 on December 4, 1998) and revised in Permit No. AQ0074CPT03.

Conditions 14 through 21 incorporate terms and conditions as developed in Permit Nos. AQ0074CPT03 and AQ0074MSS01 for the strategic reconfiguration alternative operating scenario. Conditions 14 and 15 are owner requested limits to protect ambient air quality; conditions 16 through 21 are owner requested limits to avoid PSD major modification. The permit incorporates associated monitoring, recordkeeping, and reporting requirements.

⁸ See ADEC Air Permits Web Site at <http://www.dec.state.ak.us/air/ap/docs/sulfgas.pdf>, under "Stoichiometric Mass Balance Calculations of Exhaust Gas SO₂ Concentration."

Condition 22 incorporates owner requested limits to avoid classification as HAP major as developed in Permit No. AQ0074CPT02. The permit incorporates associated monitoring, recordkeeping, and reporting requirements.

Conditions 23, Insignificant Emission Units

Legal Basis: The Permittee is required to meet state emission standards set out in 18 AAC 50.050 and 50.055 for all industrial processes fuel-burning equipment, and incinerators regardless of size.

Factual Basis: The conditions re-iterate the emission standards and require compliance for insignificant emission units. The Permittee may not cause or allow their equipment to violate these standards. Insignificant emission units are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance.

The Department finds that the insignificant units at this stationary source do not require specific monitoring, recordkeeping and reporting to ensure compliance under these conditions.

Condition 23.4a requires certification that the units did not exceed State emission standards during the previous year and did not emit any prohibited air pollution.

This condition was modified from the Standard Permit Condition V to incorporate the re-arrangement of terms, but no condition text was changed.

Conditions 24 - 31, NSPS Subpart A Requirements

Legal Basis: The Permittee must comply with those New Source Performance Standard (NSPS) provisions effective July 1, 2007, incorporated by reference, for specific industrial activities, as listed in 18 AAC 50.040⁹.

Most affected facilities (with the exception of some storage tanks) subject to an NSPS are subject to Subpart A. At this stationary source, EU IDs 18 and 19 are subject to NSPS Subpart GG, while EU ID 26 is subject to NSPS Subpart K. These emission units are therefore subject to Subpart A.

Condition 24.1 through 24.3 - The Permittee is subject to the notification requirements in 40 C.F.R. 60.7 (a)(1) & (3) for EU IDs 18 and 19, and in the event of a new NSPS affected facility¹⁰ or in the event of a modification or reconstruction of an existing facility¹¹ into an affected facility.

Condition 24.4 – The requirements to notify the EPA and the Department of any proposed replacement of components of an existing facility (40 C.F.R. 60.15) apply in the event that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility.

Condition 25 – Start-up, shutdown, or malfunction record maintenance requirements in 40 C.F.R. 60.7(b) are applicable to all NSPS affected facility subject to Subpart A.

⁹ EPA has not delegated to the Department the authority to administer the NSPS program as of the issue date of this permit.

¹⁰ *Affected facility* means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 C.F.R. 60.2, effective 7/1/07.

¹¹ *Existing facility* means, with reference to a stationary source, any apparatus of the type for which a standard is promulgated in this part, and the construction or modification of which was commenced before the date of proposal of that standard; or any apparatus which could be altered in such a way as to be of that type, as defined in 40 C.F.R. 60.2, effective 7/1/07.

Conditions 26 and 27 – NSPS excess emission reporting requirements and summary report form in 40 C.F.R. 60.7(c) & (d) are applicable to affected units that use continuous monitoring device and for turbines subject to Subpart GG that use periodic sulfur monitoring requirement in condition 34.1a. The Department has included in Attachment A of the statement of basis a copy of the federal EEMSP summary report form for use by the stationary source. Conditions 26 and 27 do not apply to Subpart GG turbines that are monitored under condition 34.1b.

Recordkeeping requirements in 40 C.F.R. 60.7(f) are applicable to all NSPS emission units. (Satisfied by condition 62).

Condition 28 – The Permittee shall comply with the initial performance test requirements in 40 C.F.R. 60.8 for EU IDs 18 and 19 upon installation. However, the Permittee is still subject to these requirements in the event of a new NSPS affected facility, in the event of a modification or reconstruction of an existing facility into an affected facility, or at such other times as may be required by EPA.

Condition 29 – Good air pollution control practices in 40 C.F.R. 60.11 are applicable to all NSPS sources subject to Subpart A (EU IDs 18, 19, and 26).

Condition 30 – This condition states that any credible evidence may be used to demonstrate compliance or establishing violations of relevant NSPS standards for EU IDs 18, 19, and 26.

Condition 31 – Concealment of emissions prohibitions in 40 C.F.R. 60.12 are applicable to EU IDs 18 and 19.

Factual Basis: Subpart A contains the general requirements applicable to all affected facilities (sources) subject to NSPS. In general the intent of NSPS is to provide technology-based emission control standards.

Condition 32, NSPS Subpart K Requirements

Legal Basis: NSPS Subpart K applies to storage vessels for petroleum liquids with storage capacities greater than 40,000 gallons that were built or modified after March 8, 1974 and prior to May 19, 1978. EU ID 26 was constructed during this time frame. This storage vessel has storage capacity greater than 40, 000 gallons and store petroleum liquids.

Factual Basis: This condition incorporates the equipment standards and recordkeeping requirements of 40 C.F.R. Subpart K, as set out in conditions 32.1 through 32.3. Per 40 C.F.R. 60.113(d), the Permittee is exempt from the operational monitoring requirements of condition 32.3 if the true vapor pressure of the liquid stored in the tanks is maintained below 1.0 psia, or if the affected tanks are equipped with a vapor recovery and return or disposal system in accordance with the requirements of conditions 32.1 and 32.2. If the true vapor pressure is maintained below 1.5 psia, then there are no applicable equipment standards. If these criteria are met, then there are no applicable requirements other than those found in 40 C.F.R. 60, Subpart A.

During processing of the initial Title V operating permits for Alyeska Pump Stations 01, 03, 04, 05, and 12, the Department granted permit shields for Subpart K based on the applicability letter from EPA dated March 3, 1983 and an August 10, 1979 EPA Region X memorandum stating that Subpart K standards are unenforceable because they are work practice/equipment (and not emissions) standards promulgated in 1974 prior to the 1977

CAA amendments. However, neither documents stated that Subpart K is not applicable. In the case *Adamo Wrecking*, 434 US 257 (1978), the U.S. Supreme Court determined for that case that work practices standards were not authorized by the 1970 Clean Air Act.

However, during the renewal permit processing, the Department has re-evaluated the previous permit shield decision and has asserted that the Subpart K provisions should be included in the permit and the shield removed, based on the Department's position that: (a) in State regulation Subpart K has been adopted as an applicable requirement for other Title V sources; and (b) the 6th Circuit Court (*Adamo Wrecking*) does not have jurisdiction in the 9th Circuit Court area. In addition, NSPS Subpart K was promulgated on March 8, 1974 (39 FR 9317) and revised several times thereafter (i.e., April 17, 1974, June 4, 1974, July 25, 1977, April 4, 1980, January 27, 1983, April 8, 1987, and October 17, 2000). With successive revisions of Subpart K and in recognition that neither the Circuit Court nor EPA vacated the subpart the Department deemed that EPA still holds it as an applicable requirement. The Department also notes that other air quality control state agencies have included NSPS Subpart K requirements for affected petroleum storage tanks as conditions in their operating permits, just like any other applicable federal requirements. Furthermore, the EPA continues to delegate authority to implement and enforce certain NSPS that includes Subpart K to several regional, state, and local agencies (e.g., the Puget Sound Clean Air Agency (PSCAA)). As such and in view of the fact that Subpart K is applicable to the aforementioned Pump Stations, the Department is including the Subpart K requirements into this operating permit renewal and is rejecting APSC's shield request for Subpart K.

Finally, the State adopted this standard by reference under State Statutes effective January 1997 after the Clean Air Act amendments of 1990. The Department included it as part of its EPA approved Operating Permit Program approval. EPA approved the packet effective November 30, 2001. Since adoption, no State court has found this standard as not applicable nor unenforceable. Note that the Department periodically updates its incorporations by reference, most recently the C.F.R. as revised through July 1, 2007.

Conditions 33 - 34, NSPS Subpart GG Requirements

Legal Basis: This condition prohibits the Permittee from exceeding emission standards set out in Subpart GG. NSPS Subpart GG applies to stationary gas turbines with a heat input at peak load (maximum load at 60 percent relative humidity, 59 degrees F, and 14.7 psi) equal to or greater than 10.7 gigajoules per hour (10 MMBtu/hr), based on the lower heating value of the fuel fired and constructed, modified, or reconstructed after October 3, 1977 and on or before February 18, 2005.

Factual Basis: These conditions incorporate NSPS Subpart GG NO_x emission and sulfur compound limits. The Permittee may not allow equipment to violate these standards.

NO_x Standard: For a turbine subject to 40 C.F.R. 60.332, the NO_x standard is determined by the following equation:

$$STD_{NOX} = 0.015(14.4 / Y) + F$$

where,

- STD_{NOx} = allowable NOx emissions (percent by volume at 15 percent oxygen and on a dry basis)
- Y = manufacturer's maximum rated heat input (kJ/W-hr), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the affected stationary source. The value of Y shall not exceed 14.4 kJ/W-hr
- F = NOx emissions allowance for fuel bound nitrogen, percent by volume, assumed to be zero for Alaska fuel.

Based on the manufacturer's heat rating at manufacturer's rated peak load, and assuming fuel bound nitrogen of zero, the NOx standard is 212 ppmv for EU IDs 18 (when firing fuel gas) and 19, and 205 ppmv for EU ID 18 (when firing diesel fuel).

SO₂ Standard: The Permittee is required to comply with one of the following sulfur requirements for EU IDs 18 and 19 (turbines):

- (1) do not cause or allow SO₂ emission in excess of 0.015 percent by volume, at 15 percent O₂ and on a dry basis (150 ppmv), or
- (2) do not cause or allow the sulfur content for the fuel burned in EU IDs 18 and 19 to exceed 0.8 percent by weight .

The Permittee chooses to comply with option (2) above.

Exemptions: Gas turbines exempted from NSPS Subpart GG emission standards are as provided in 40 C.F.R. 60.332(e) – (1).

Conditions 33.3 - 33.5, NOx Monitoring, Recordkeeping, and Reporting

Legal Basis: Periodic monitoring is included in condition 33.3 for all turbines that normally operate for greater than 400 hours in a 12 month period. This additional monitoring is necessary to ensure that turbine emissions comply with the NSPS NOx standard and is required under 40 C.F.R. 71.6(a)(3) as the subpart does not contain MR&R sufficient for an operating permit.

Factual Basis: The Department does not have enough information to make categorical determinations that certain types of turbines, or turbines with emission test results below a certain percentage of the Subpart GG NOx emission limit will inherently comply with the Subpart GG limit at all times and will never need additional testing. After a sufficient body of NOx data is gathered under monitoring conditions for compliance with 40 C.F.R. 60, Subpart GG, the Department may find that it has enough information to make such categorical determinations. In that event, the Department would revise the NOx monitoring conditions. The Department may determine that to assure compliance it is necessary to retain or increase the current monitoring frequency.

These conditions do not include the initial NSPS performance test requirements as the Subpart A conditions cover these requirements. If an existing or new turbine under this permit is still subject to the performance test requirement of 40 C.F.R. 60.8, such requirement is covered under the Subpart A related conditions.

The intent of these conditions is that turbines or groups of turbines be routinely tested on no less than a 5-year cycle. If the most recent performance test on a turbine showed NOx

emissions at less than or equal to 90 percent of the limit shown in condition 33 then periodic monitoring is required at the first applicable of three criteria: either within 5 years of the last performance test, or within a year of the issue date of the permit, or within a year of exceeding 400 hours of operation within a 12-month period. For clarification, the Department added a 6 month cut-off date for triggering source testing within 1 year after permit issue date in accordance with condition 33.3a(i)(B). The 6-month trigger identifies when condition 33.3a(i)(C) would be enacted to require source testing within 1 year of triggering 400 hours. This ensures that a unit would not appear to be out of compliance with condition 33.3a(i)(B) once it finally triggered condition 33.3a(i)(C).

If the most recent performance test showed operations at greater than 90 percent of the limits in condition 33, then periodic monitoring source testing is required every year until two consecutive tests show emissions at less than or equal to 90 percent of the limit.

The condition does not state how load must be measured. For some turbines it may be possible to directly measure load as either mechanical or electrical output. For others, it may be necessary to calculate load indirectly based on measurements of other parameters. The Department is not attempting to dictate what method is most appropriate through the permit condition, but should evaluate the adequacy of methods of calculating load based on the load monitoring proposed by the Permittee.

Subpart GG defines “emergency gas turbine¹²” and exempts turbines meeting that definition from the GG emission standards. Some turbines may be operated as standby equipment but not meet the definition of emergency turbine, so the Department has added a Method 20, or Method 7E and either Method 3 or 3A, monitoring threshold of 400 hours per 12-month period. For turbines expected to operate less than 400 hours the Department has also added recordkeeping for hours of operation. The Department does not intend to require the Permittee to operate a turbine solely for the purpose of testing.

The condition requires testing at a range of loads, consistent with the performance test requirements in Subpart GG, that is, test at 30, 50, 75, and 100 percent load. If testing at these four loads is not reasonable, the condition allows the Permittee to propose to the Department what test loads will be reasonable and adequate, and the Department will have the responsibility to make a finding on that proposal. If EPA has already approved alternative test loads for the initial performance test the Department would allow those test loads if the information that went into that decision were still representative of the turbine operation.

In condition 33.3b(ii)(C)(4), the Department considers “fuel type” to mean, for liquid fuels a type of fuel as described in an ASTM or similar fuel specification.

Load measurements or load calculations from load surrogate measurements are for one-hour periods. The intent is to match the averaging period for the test method. Method 20 identifies a number of traverse points that vary with the size of the stack. From these points the tester is to choose at least 8 points for NOx measurements. The time at each point is to be at least one minute plus the average response time of the instrument. The recorded value is the average steady state response. Presumably, the steady state response would exclude

¹² *Emergency Gas Turbine* means any stationary gas turbine that operates as a mechanical or electrical power source only when the primary power source for a facility has been rendered inoperable by an emergency situation, as defined in 40 C.F.R. 60.331(e), effective 7/1/07.

some or all of the response time of the instrument. Three runs are to be done at each test load.

The three runs would represent 24 minutes of measurement time or more. A one-hour average load is therefore a reasonable approximation of a load period corresponding to the test method.

Conditions 34.1 - 34.4, SO₂ Monitoring, Recordkeeping, and Reporting

Legal Basis: This condition requires the Permittee to comply with NSPS Subpart GG SO₂ or fuel quality monitoring, record keeping and reporting.

Factual Basis: Monitoring, recordkeeping, and reporting requirements for this condition are described in NSPS Subpart GG and have been referenced here. No additional monitoring outside of the Subpart GG requirements is necessary to ensure compliance with the NSPS SO₂ standard.

Monitoring: Condition 34.1 incorporates NSPS Subpart GG fuel sulfur monitoring requirements. Per 40 C.F.R. 60.334(h)(3) and as set out in condition 34.1b, the owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 C.F.R. 60.331(u), regardless of whether an existing custom schedule approved by the Administrator requires such monitoring. The Permittee has elected not to conduct sulfur monitoring as allowed under condition 34.1b and submitted a demonstration to EPA, pursuant to 40 C.F.R. 60.334(h)(3), to show that the fuel gas combusted at Pump Stations 1-4 meets the definition of natural gas as defined by 40 C.F.R. 60.331(u). EPA confirmed by letter dated December 11, 2006 that APSC has adequately demonstrated that total sulfur and methane content of the fuel gas meets the definition of fuel gas found in 40 C.F.R. 60.331(u). Therefore, no monitoring of total sulfur content is necessary for EU IDs 18 and 19 when they burn natural gas. However, sulfur monitoring is still required when EU ID 18 burns fuel oil.

Recordkeeping: The Permittee is required to maintain records of all sulfur monitoring data required by NSPS Subpart GG for five years as set out in condition 62.

Reporting: NSPS Subpart GG SO₂ standard reporting requirements for turbines monitored under condition 34.1a are incorporated in the permit in condition 34.4. For the purpose of the EEMSP reports and summary report required under 40 C.F.R. 60.7(c), report daily periods during which the sulfur content of the fuel being fired in the turbine exceeds 0.8 percent. As stated in conditions 26, 27, and 66, reports are to be submitted to the Department and EPA, and summarized in the operating report required under condition 67.

Conditions 35 - 37, Standard Terms and Conditions

Legal Basis: These are standard conditions required under 18 AAC 50.345(a) and (e)-(g) for all operating permits. This provision is incorporated in the federally approved Alaska operating permit program of November 30, 2001.

Factual Basis: These are standard conditions that apply to all permits.

Condition 38, Administration Fees

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.400-405 as derived from AS 46.14.130. This condition requires the Permittee,

owner, or operator to pay administration fees as set out in regulation. Paying administration fees is required as part of obtaining and holding a permit with the Department or as a fee for a Department action.

Factual Basis: The owner or operator of a stationary source who is required to apply for a permit under AS 46.14.130 shall pay to the Department all assessed permit administration fees. The regulations in 18 AAC 50.400-405 specify the amount, payment period, and the frequency of fees applicable to a permit action.

Conditions 39 - 40, Emission Fees

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.410-420. The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These emission fee conditions are Standard Permit Condition I under 18 AAC 50.346(b) adopted pursuant to AS 46.14.010(e). Except for the modification noted in the last paragraph of this “Factual Basis”, the Department determined that these standard conditions adequately meet the requirements of AS 46.14.250. No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of AS 46.14.250.

These standard conditions require the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date.

The default assessable emissions are emissions of each air pollutant authorized by the permit (AS 46.14.250(h)(1)(A)).

The conditions allow the Permittee to calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air pollutant. Therefore, fees based on actual emissions must also be paid on any pollutant emitted whether or not the permit contains any limitation of that pollutant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match.

The Department modified the standard condition to correct condition 40.2 such that it referenced “submitted” (i.e., postmarked) rather than “received” in accordance with the timeframe of condition 40.1.

Condition 41, Good Air Pollution Control Practice

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.346(b)(5) and applies to all emission units, **except** those subject to federal emission standards, those subject to continuous emission or parametric monitoring, and for insignificant emission units, i.e., except EU IDs 11 – 13, 18, 19, and 21.

Factual Basis: The condition requires the Permittee to comply with good air pollution control practices for all emission units (except insignificant emission units).

Maintaining and operating equipment in good working order is fundamental to preventing unnecessary or excess emissions. Standard conditions for monitoring compliance with emission standards are based on the assumption that good maintenance is performed. Without appropriate maintenance, equipment can deteriorate more quickly than with appropriate maintenance. If appropriate maintenance is not applied to the equipment, the Department may have to apply more frequent periodic monitoring requirements (unless the monitoring is already continuous) to ensure that the monitoring results are representative of actual emissions.

The Permittee is required to keep maintenance records to show that proper maintenance procedures were followed, and to make the records available to the Department. The Department may use these records as a trigger for requesting source testing if the records show that maintenance has been deferred.

Condition 42, Dilution

Legal Basis: This condition prohibits the Permittee from using dilution as an emission control strategy as set out in 18 AAC 50.045(a). This State regulation applies to the Permittee because the Permittee is subject to emission standards in 18 AAC 50.

Factual Basis: The condition prohibits the Permittee from diluting emissions as a means of compliance with any standard in 18 AAC 50.

Condition 43, Reasonable Precautions to Prevent Fugitive Dust

Legal Basis: This condition requires the Permittee to use reasonable precautions when handling, storing or transporting bulk materials or engineering in an industrial activity in accordance with the applicable requirement in 18 AAC 50.045(d). Bulk material handling requirements apply to the Permittee because the Permittee will engage in bulk material handling, transporting, or storing; or will engage in industrial activity at the stationary source.

Factual Basis: The condition requires the Permittee to comply with 18 AAC 50.045(d), and take reasonable action to prevent particulate matter (PM) from being emitted into the ambient air.

Condition 44, Stack Injection

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.045(e)-(f) and 50.055(g). It prohibits the Permittee from releasing materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack (i.e. disposing of material by injecting it into a stack). Stack injection requirements apply to the stationary source because the stationary source contains a stack or source constructed or modified after November 1, 1982.

Factual Basis: No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the emission unit or stack would need to be modified to accommodate stack injection.

Condition 45, Air Pollution Prohibited

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.110. The condition prohibits the Permittee from causing any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. Air Pollution Prohibited requirements apply to the stationary source because the stationary source will have emissions.

Factual Basis: While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

ADEC adopted this standard condition into 18 AAC 50.346(a) pursuant to AS 46.14.010(e). The Department determined that this condition adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard condition meets the requirements of 40 C.F.R. 71.6(a)(3).

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints and to submit copies of these records upon request of the Department.

Condition 46, Technology-Based Emission Standard

Legal Basis: The Permittee is required to take reasonable steps to minimize emissions if certain activity causes an exceedance of any technology-based emission standard in this permit. This condition ensures compliance with the applicable requirement in 18 AAC 50.235. Technology Based Emission Standard requirements apply to the stationary source because the stationary source contains equipment subject to a technology-based emission standard, such as BACT, MACT, LAER, NSPS or other “technologically feasible” determinations.

Factual Basis: The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with condition 66. Excess emission reporting under condition 66 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under condition 66.

Condition 47, Asbestos NESHAP

Legal Basis: The condition requires the Permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R. 61, Subpart M. This condition ensures compliance with the applicable requirement in 18 AAC 50.040(b)(1) and (2)(F). The asbestos demolition and renovation requirements apply if the Permittee engages in asbestos demolition or renovation.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Condition 48, Refrigerant Recycling and Disposal

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(d) and applies if the Permittee engages in the recycling or disposal of certain refrigerants. The condition requires the Permittee to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F, which will apply if the Permittee uses certain refrigerants.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Condition 49, NESHAPs Applicability Determinations

Legal Basis: This condition requires the Permittee to keep and make available to the Department copies of the major stationary source determination and applicability of specific federal regulations that may apply to its stationary sources.

Factual Basis: The Permittee has conducted an analysis of the stationary source and determined that it is not a major HAPs stationary source based on emissions. This condition requires the Permittee to keep and make available to the Department copies of the major stationary source determination.

Conditions 50 - 51, Halon Prohibitions

Legal Basis: These prohibitions apply to all stationary sources that use halon for fire extinguishing and explosion inerting. The condition prohibits the Permittee from causing or allowing violations of these prohibitions. The stationary source uses halon and is therefore subject to the federal regulations contained in 40 C.F.R. 82.

Factual Basis: These conditions incorporate applicable 40 C.F.R. 82 requirements. This condition is aimed at halon fire fighting systems used at stationary sources with significant sized emission units. Although the condition is titled Halon Prohibitions, it references the Protection of Stratospheric Ozone prohibitions in both Subpart G (Significant New Alternatives Policy Program) and Subpart H (Halon Emission Reduction).

Condition 52, Open Burning

Legal Basis: The condition requires the Permittee to comply with the regulatory requirements when conducting open burning at the stationary source. This condition ensures compliance with the applicable requirement in 18 AAC 50.065. The open burning state regulation in 18 AAC 50.065 applies to the Permittee if the Permittee conducts open burning at the stationary source.

Factual Basis: No specific monitoring is required for this condition. The Department has modified the condition by incorporating the requirements of 18 AAC 50.065 by reference. Condition 52.1 requires the Permittee to keep "sufficient records" to demonstrate compliance with the standards for conducting open burning, but does not specify what these records should contain.

More extensive monitoring and recordkeeping is not warranted because the Permittee does not conduct open burning as a routine part of their business. Also, most of the requirements

are prohibitions, which are not easily monitored. Compliance is demonstrated through annual certification required under condition 68.

Condition 53, Requested Source Tests

Legal Basis: The Permittee is required to conduct source tests as requested by the Department. The Department adopted this condition under 18 AAC 50.345(k) as part of its operating permit program approved by EPA November 30, 2001.

Factual Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.220(a) and applies because this is a standard condition to be included in all operating permits. Monitoring consists of conducting the requested source test.

Conditions 54 - 56, Operating Conditions, Reference Test Methods, Excess Air Requirements

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.220(b) and applies because the Permittee is required to conduct source tests by this permit. The Permittee is required to conduct source test as set out in conditions 54 through 56.

Factual Basis: These conditions supplement the specific monitoring requirements stated elsewhere in this permit. Compliance monitoring with conditions 54 through 56 consists of the test reports required by condition 61.

Condition 57, Test Exemption

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.345(a) and applies when the source exhaust is observed for visible emissions.

Factual Basis: As provided in 18 AAC 50.345(a), amended May 3, 2002, the requirements for test plans, notifications and reports do not apply to visible emissions observations by smoke readers, except in connection with required particulate matter testing.

Conditions 58 - 61, Test Deadline Extension, Test Plans, Notifications and Reports

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.345(l) - (o) and applies because the Permittee is required to conduct source test by this permit.

Factual Basis: Standard conditions 18 AAC 50.345(l) - (o) are incorporated through these conditions. These standard conditions supplement specific monitoring requirements stated elsewhere in this permit. The source test itself monitors compliance with this condition.

Condition 62, Recordkeeping Requirements

Legal Basis: Applies because the Permittee is required by the permit to keep records.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide an evidence of compliance with this requirement.

Condition 63, Certification

Legal Basis: This condition requires the Permittee to comply with the certification requirement in 18 AAC 50.205 and applies to all Permittees under EPA's approved operating permit program of November 30, 2001.

Factual Basis: This standard condition is required in all operating permits under 18 AAC 50.345(j). This condition requires the Permittee to certify any permit application, report, affirmation, or compliance certification submitted to the Department. To ease the certification burden on the Permittee, the condition allows the excess emission reports to be **certified** with the stationary source report, even though it must still be **submitted** more frequently than the stationary source operating report. This condition supplements the reporting requirements of this permit.

Condition 64, Submittals

Legal Basis: This condition requires the Permittee to comply with standardized reporting requirement in 18 AAC 50.326(j) and applies because the Permittee is required to send reports to the Department.

Factual Basis: This condition requires the Permittee to send submittals to the address specified in this condition. The Permittee is required to submit an original and one copy of reports, compliance certifications, and other submittals required by this permit. Receipt of the submittal at the correct Department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of this permit.

Condition 65, Information Requests

Legal Basis: This condition requires the Permittee to submit requested information to the Department. This is a standard condition from 18 AAC 50.345(i) of the State approved operating permit program effective November 30, 2001.

Factual Basis: This condition incorporates a standard condition in regulation, which requires the Permittee to submit information requested by the Department. Monitoring consists of receipt of the requested information.

Condition 66, Excess Emission and Permit Deviation Reports

Legal Basis: This condition requires the Permittee to comply with the applicable requirement in 18 AAC 50.235(a)(2) and 18 AAC 50.240. Also, the Permittee is required to notify the Department when emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The Department adopted this condition as Standard Operating Permit Condition III under 18 AAC 50.346(c) pursuant to AS 46.14.010(e). The Department made a correction to the Standard Operating Permit Condition III to allow identical reporting methodology for both Excess Emissions and Permit Deviations reports which use identical forms and should have identical submissions methods. The Department further amended the language to specifically cross reference conditions that require APSC to submit a permit deviation/excess emission notification. Beyond as noted above, the Department has previously determined

that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emission unit or stationary source operational or compliance factors indicate the unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions as modified meets the requirements of 40 C.F.R. 71.6(a)(3).

Section 14, Notification Form

The Department modified the notification form, deviating from Standard Permit Condition IV, to more adequately meet the requirements of Chapter 50, Air Quality Control. The modification consisted of correcting typos and moving failure to monitor/report and recordkeeping to the permit deviations Section 2.

Condition 67, Operating Reports

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.346(b)(6) and applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit. The reports themselves provide monitoring for compliance with this condition.

The Department used the Standard Permit Condition VII as adopted into regulation on August 20, 2008. For reporting, MR&R conditions are Standard Permit Condition VII adopted into regulation pursuant to AS 46.14.010(e). The Department has made a correction to the Standard Permit Condition VII by changing the number of copies of documents to be submitted from “an original and two copies” to “an original and one copy”. Beyond as noted above, the Department has previously determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emission unit or stationary source operational or compliance factors indicate the unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions as modified meets the requirements of 40 C.F.R. 71.6(a)(3).

Condition 68, Annual Compliance Certification

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(j)(4) and applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. The reports themselves provide monitoring for compliance with this condition.

Condition 68.2 provides clarification of transition periods between an expiring permit and a renewal permit to ensure that the Permittee certifies compliance with the permit terms and conditions of the permit that were in effect during those partial date periods involved in the transition. No format is specified: the Permittee may provide one report certifying compliance with each permit term or condition and the effective permit at that time, or may chose to provide two reports – one certifying compliance with permit terms and conditions from January 1 until the date of expiration of the old permit, and a second report certifying compliance with terms and conditions in effect from the effective date of the renewal permit until December 31.

This condition was further modified to allow the Permittee to submit one of the required two copies in electronic format. This change more adequately meets the requirements of 18 AAC 50 and agency needs, as the Department can more efficiently distribute the electronic copy to staff in other locations.

Condition 69, NSPS and NESHAP Reports

Legal Basis: The Permittee is required to provide the federal administrator and Department a copy of each emission unit report for units subject to NSPS or NESHAP federal regulations under 18 AAC 50.326(j)(4). 40 C.F.R. 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60 and 40 C.F.R. 61. The reports themselves provide monitoring for compliance with this condition.

Condition 70, Permit Applications and Submittals

Legal Basis: The Permittee may need to submit permit applications and related correspondence.

Factual Basis: Standard Condition XIV directs the applicant to send copies of all application materials required to be submitted to the Department directly to the EPA, in electronic format if practicable. This condition shifts the burden of compliance from the Department to ensure that copies of application materials are submitted to EPA by transferring that responsibility to the Permittee.

Conditions 71 - 73, Permit Changes and Revisions Requirements

Legal Basis: The Permittee is obligated to notify the Department of certain off-permit source changes and operational changes under 18 AAC 50.326(j)(4). 40 C.F.R. 71.6(a)(10), (12), and (13) incorporated by reference under 18 AAC 50.040(j) require these provisions within this permit. 40 C.F.R. 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: These are conditions required in 40 C.F.R. 71.6 for all operating permits to allow changes within a permitted stationary source without requiring a permit revision. The Permittee did not request trading of emission increases and decreases as described in 71.6(a)(13)(iii).

Condition 74, Permit Renewal

Legal Basis: The Permittee must submit a timely and complete operating permit renewal application if the Permittee intends to continue source operations in accord with the operating permit program under 18 AAC 50.326(j)(3). The obligations for a timely and complete operating permit application are set out in 40 C.F.R. 71.5 incorporated by reference in 18 AAC 50.040(j)(3). 40 C.F.R. 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: In accordance with AS 46.14.230(a), this operating permit is issued for a fixed term of five years after the date of issuance, unless a shorter term is requested by the permit applicant. The Permittee is required to submit an application for permit renewal by the specific dates applicable to the stationary source as listed in this condition. As stated in

40 C.F.R. 71.5(a)(1)(iii), submission for a permit renewal application is considered timely if it is submitted at least six months but no more than eighteen months prior to expiration of the operating permit. According to 71.5(a)(2), a complete renewal application is one that provides all information required pursuant to 40 C.F.R. 71.5(c) and must remit payment of fees owed under the fee schedule established pursuant to 18 AAC 50.400. 40 C.F.R. 71.7(b) states that if a source submits a timely and complete application for permit issuance (including renewal), the source's failure to have a permit is not a violation until the permitting authority takes final action on the permit application.

Therefore, for as long as an application has been submitted within the timeframe allowed under 40 C.F.R. 71.5(a)(1)(iii), and is complete before the expiration date of the existing permit, then the expiration of the existing permit is extended and the Permittee has the right to operate under that permit until the effective date of the new permit. However, this protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit by the deadline specified in writing by the Department any additional information needed to process the application. Monitoring, recordkeeping, and reporting for this condition consist of the application submittal.

Conditions 75 - 79, General Compliance Requirements

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.326(j)(3). The Permittee is required to comply with these standard conditions set out in 18 AAC 50.345 included in all operating permits. 40 C.F.R. 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: These are standard conditions for compliance required for all operating permits.

Conditions 80 - 81, Permit Shield

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.326(j) and applies because the Permittee has requested that the Department shield the source from the applicable requirements listed under this condition under the federally approved State operating program effective November 30, 2001.

Factual Basis: Table D of Operating Permit No. AQ0074TVP02 shows the permit shields that the Department granted to the Permittee. The following table shows the requests that were denied and the reasons that they were denied. The Department based the determinations on the permit application, past operating permit, likelihood for the source to become subject during the life of the permit, Title I permits and inspection reports.

Table L - Permit Shields Denied

Shield Requested for:	Reason for Shield Request:	Reason for Request Denial:
Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for EU ID 26 (TK-130)	Subpart K is a work practice standard. In the case <i>Adamo Wrecking</i> , 434 US 257 (1978), the U.S. Supreme Court determined that work practices standards were not authorized by the Clean Air Act. The EPA documented this decision for purposes of Subpart K in a memorandum dated 8/10/79. EPA transmitted a specific letter to Alyeska stating the application of the decision for the crude oil tanks and that Subpart K was not enforceable.	In State regulation Subpart K has been adopted as an applicable requirement, and the 6 th Circuit Court (<i>Adamo Wrecking</i>) does not have jurisdiction in the 9 th Circuit Court area. See also Statement of Basis text regarding condition 32.
18 AAC 50.055(g) for turbines, EU IDs 18 & 19	Manufacturer’s recommended maintenance practice of on-line turbine washing (with a water cleaning solution mixture) is not stack injection since the injection occurs at the turbine compressor inlet and the mixture undergoes combustion in the turbine combustion chamber. Cleaning process is part of good air pollution practices.	18 AAC 50.055(g) is a state standard term that applies to all stationary sources.
40 C.F.R. 60 Subpart A – General Provisions: (Initial Notification/Test Only) for EU IDs 18 & 19: §60.7(a)(1), (3) & (4) – Notification and Recordkeeping §60.8 – Performance Test	60.7(a)(1) & (3) and 60.8 are one-time only requirements that have already been fulfilled. 60.7(a)(4) applies to existing facilities, whereas Units 18 and 19 are affected facilities.	These are general NSPS requirements that are applicable anytime a modification or reconstruction of an existing emission unit will result into NSPS subpart applicability, or in the event a new NSPS rule becomes applicable during the life of the permit.
§60.334(h)(1) – Sulfur Monitoring for EU IDs 18 & 19 §60.334(i) - Frequency of determining the sulfur and nitrogen content for EU IDs 18 & 19	Sulfur monitoring under 60.334(h)(1) is not required because the fuel fired at PS-3 meets the definition of natural gas as defined in 40 C.F.R. 60.334(u). Not required for EU IDs 18 (only when fired with natural gas) and 19 because APSC has chosen not to monitor fuel sulfur or claim an allowance for fuel bound nitrogen	Although APSC has certified that the fuel for EU IDs 18 (only when fired with natural gas) and 19 meets the definition of natural gas as defined in 40 C.F.R. 60.334(u), the Department has retained both monitoring options in the permit.
40 C.F.R. 63 Subpart HHHHHH – NESHAP for Paint Stripping and Miscellaneous Surface Coating Operations for Stationary Source-Wide	MeCl is not used for paint stripping. Painting activities occurring at the stationary source meet the definition of facility maintenance as defined by 40 C.F.R. 63.11180, and thus, are categorically exempt from 63.11170(a)(2) & (3).	Although APSC certified they only conduct such activities for maintenance and do not, at the time of application, use MeCl, APSC is not prohibited from using this solvent during the life of this permit.

Attachment A

Figure 1 -- Summary Report -- Excess Emission and Monitoring System Performance

Pollutant (Circle One—SO₂/NO_x/fuel sulfur)

Reporting period dates:

From _____ to _____

Company: _____

Emission Limitation: _____

Address: _____

Monitor Manufacturer and Model No.: _____

Date of latest CMS (CEMS and PEMS) Certification or Audit: _____

Process Unit(s) Description: _____

Total source operating time in reporting period¹: _____

Emission Data Summary¹	CMS (CEMS and PEMS) Performance Summary¹
1. Duration of excess emissions in reporting period due to: a. Startup/shutdown _____ b. Control equipment problems _____ c. Process problems _____ d. Other known causes _____ e. Unknown causes _____ 2. Total duration of excess emission _____ 3. Total duration of excess emissions X (100)/[Total source operating time] _____ % ²	1. CMS (CEMS and PEMS) downtime in reporting period reporting period due to: a. Monitor equipment malfunctions _____ b. Non-Monitor equipment malfunctions _____ c. Quality assurance calibration _____ d. Other known causes _____ e. Unknown causes _____ 2. Total CMS (CEMS and PEMS) Downtime _____ 3. [Total CMS (CEMS and PEMS) Downtime] X (100)/[Total source operating time] _____ % ²

¹ For opacity, record all times in minutes. For gases, record all times in hours.

² For the reporting period: If the total duration of excess emissions is 1 percent or greater of the total operating time or the total CMS (CEMS or PEMS) downtime is 5 percent or greater of the total operating time, both the summary report form and the excess emission report described in this condition shall be submitted.

On a separate page, describe any changes since last quarter in CMS, process or controls. I certify that the information contained in this report is true, accurate, and complete.

 Name

 Signature