
 <b>Department of Environmental Conservation</b> <b>Policy and Procedure</b> <b>Policy</b>		PROCEDURE NUMBER	1 of 2
		04.02.108	
		EFFECTIVE DATE	October 8, 2004
SUBJECT		SUPERSEDES	
Ambient Air Quality Issues at Worker Housing		All Previous Editions	
SECTION	CHAPTER	APPROVED BY	
Air Quality Division	Permit Processing	 10/23/04	

## PURPOSE

Establish a procedure for air quality modeling of worker housing areas

Many stationary sources in Alaska provide on-site worker housing. In these situations, the Department must decide whether the housing areas should be treated as “ambient air” and included in a permit applicant’s ambient demonstration.

“Ambient air” is defined in Alaska and federal regulations as outside air to which the public has access. Ambient air typically excludes that portion of the atmosphere within a source’s boundary.<sup>1</sup> However, areas within the property boundary that are accessible to the public are treated as ambient air. Typical examples include public roads, rivers, parks and even other sources located within the boundaries of a geographically larger source. EPA has also clearly stated family housing areas within military reservations are ambient air.<sup>2</sup>

## POLICY

This policy applies to all Air Permit Program staff who review or conduct an ambient air quality analysis associated with a permit action, a permit-avoidance action, a petition to revise Air Quality Control Regulations, or 18 AAC 50.201.

**Action:** Staff shall treat all worker housing areas (including areas provided for families and off-duty activities) as ambient air, except when the following conditions are met.

The worker housing area is located within a secure or remote site, such as military bases with no family housing units, off-shore platforms, etc;

2. The worker housing area is for official business/worker use only; and

<sup>1</sup> The Alaska Legislature has given the Department of Environmental Conservation responsibility for managing and protecting ambient air. The Legislature has given the Department of Labor responsibility for worker safety, which includes the non-ambient air within a source’s boundary.

<sup>2</sup> EPA Modeling Clearinghouse Information Storage and Retrieval System (McHissr), “R-II Military Reservation Power Plant – April 83.” April 13, 1983.

3. the operator has a written policy stating that on-site workers are on 24 hour call.

If the owner/operator allows for family or casual visits, then staff shall treat worker housing areas as ambient air, even if workers are on 24-hour call. Likewise, staff shall treat all worker housing areas that have uncontrolled access as ambient air, even if the workers are on 24-hour call. Staff shall treat worker housing areas at sources with no written 24-hour call policy as ambient air.

Staff shall use and require the following approach for modeling worker housing areas.

- Place receptors in the general area surrounding the worker housing buildings (including mess halls, recreational centers, schools, etc) and all out-door support areas.
- Use a receptor density that is commensurate with the approach used to determine the receptor density at locations beyond the source's boundary.
- Do *not* use flagpole receptors to model impacts at buildings, *unless* the building has a balcony or a flat-roof that is accessible by the public or off-duty worker.<sup>3</sup>

Staff may *not* use flagpole receptors to model impacts at open windows and building air intakes.<sup>4</sup> When flagpole receptors are used, the modeled impacts are subject to ambient air quality standards, but not increments.<sup>5</sup>

## AUTHORITY

See the footnotes.

## IMPLEMENTATION RESPONSIBILITY

Program Manager and Section Manager.

---

<sup>3</sup> The approach regarding flagpole receptors differs from past Department practice. However, the approach is consistent with the EPA guidance listed in footnotes 4 and 5.

<sup>4</sup> EPA does not consider air at open windows and air intakes as ambient air, as stated in an April 13, 1992 letter from John Seitz (Director, OAQPS) to Daniel Gutman.

<sup>5</sup> EPA Memorandum, "Applicability of PSD Increments to Building Rooftops," Joseph Cannon (Air and Radiation Assistant Administrator) to Charles Jeter (EPA Region IV Administrator), June 11, 1984.