

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ1373MSS02

Preliminary - August 1, 2018

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ1373MSS02 to the Permittee listed below.

Permittee: Golden Harvest Alaska Seafood, LLC
2219 Rimland Drive
Bellingham, WA 98226

Stationary Source: Adak Seafood Processing Facility

Project: New Engines with ORLs

Location: Northing: 5,745,820 m, Easting: 524,932 m, Zone: 1

Permit Contact: David Bermudez
david@goldenharvest.com
907.350.4510

This project is classified under 18 AAC 50.508(6) for revising or rescinding the terms and conditions of a Title I permit and under 18 AAC 50.508(5) for establishing owner requested limits to avoid classification as a Title V major source under 18 AAC 50.326. The permit carries forward a classification of 18 AAC 50.502(c)(1) for construction of a stationary source with a potential to emit 40 tpy or more of nitrogen oxides (NO_x).

This permit satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this permit.

The Permittee may operate under the terms and conditions of this minor permit upon issuance.

James R. Plosay, Manager
Air Permits Program

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Section 1 Emissions Unit Inventory

Emissions Unit Authorization. The Permittee is authorized to operate the emissions units (EUs) listed in Table 1 in accordance with the terms and conditions of this permit and the minor permit application. The information in Table 1 is for identification purposes only unless otherwise noted in the permit. The specific EU descriptions do not restrict the Permittee from replacing an EU identified in this section.

Table 1 – Emissions Units

EU ID	Description	Make/ Model	Rating/Capacity	Fuel
1	Caterpillar	3516 DITA	2,867 hp	Diesel
2	Johnston Boiler	PFTA150-4H-150B	150 bhp	Diesel
3	Cummins	QST30-G5 NR2	1,322 hp	Diesel
4	GM Detroit	Model Series 60	500 kW	Diesel
5	GM Detroit	Model Series 60	500 kW	Diesel
6	GM Detroit	Model Series 60	500 kW	Diesel
7	GM Detroit	Model Series 60	500 kW	Diesel
8	Cummins	4BTAA3.3G7	150 kW	Diesel
9	Cummins	4BTAA3.3G7	150 kW	Diesel
10	Detroit	unknown	1,000 kW	Diesel
11	Diesel Storage Tank		300 gal	NA

Notes:

NA: not applicable

1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement EU, including any applicable minor or construction permit requirements.
2. The Permittee shall install and maintain the equipment listed in Table 1 according to the manufacturer's or operator's maintenance procedures. Keep a copy of either the manufacturer's or operator's maintenance procedures onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

Section 2 Fee Requirements

- 3. Assessable Emissions.** The Permittee shall pay to the Department annual emission fees based on the stationary source's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410. The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit in quantities 10 tons per year or greater. The quantity for which fees will be assessed is the lesser of:

 - 3.1 the stationary source's assessable potential to emit of 167 tpy; or
 - 3.2 the stationary source's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon credible evidence of actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the Department, when demonstrated by the most representative of one or more of the following methods:
 - a. an enforceable test method described in 18 AAC 50.220;
 - b. material balance calculations;
 - c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035;
 - d. other methods and calculations approved by the Department, including appropriate vendor-provided emissions factors when sufficient documentation is provided.
- 4. Assessable Emission Estimates.** Emission fees will be assessed as follows:

 - 4.1 No later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Suite 303, PO Box 111800, Juneau, AK 99811-1800; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or
 - 4.2 If no estimate is submitted on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in Condition 3.1.
- 5. Administration Fees.** The Permittee shall pay to the Department all assessed permit administration fees. Administration fee rates are set out in 18 AAC 50.400-403.
- 6. Annual Compliance Fee.** For a stationary source not classified as needing a Title V permit, the Permittee shall pay an annual compliance fee as set out in 18 AAC 50.400(d), to be paid for each period from July 1 through the following June 30.

Section 3 State Emission Standards

7. **Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from any of the EUs listed in Table 1 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.
 - 7.1 For EU IDs 4–7 and 10 perform an initial Method 9 visible emissions observation within 60 days after the emissions unit becomes fully operational.¹
 - 7.2 Report the results of the Method 9 observations required by Condition 7.1 (use Attachment 1) in the first operating report submitted under Condition 18 after the observations were performed.
 - 7.3 Notify the Department in accordance with Condition 17 if any Method 9 observation exceeds the limit in Condition 7.
8. **Particulate Matter.** The Permittee shall not cause or allow particulate matter emitted from any of the EUs listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
9. **Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as sulfur dioxide (SO₂), from any of the EUs listed in Table 1 to exceed 500 ppm averaged over three hours.

¹ Fully operational is defined as completing all testing and commissioning requirements after unit installation, or 60 days after unit installation, whichever is sooner. Installation is defined as the point when unit is ready for testing.

Section 4 Ambient Air Quality Protection Requirements

- 10.** In order to protect the annual average nitrogen dioxide (NO₂) Alaska Ambient Air Quality Standards, the Permittee shall:
- 10.1 Comply with Condition 11.
 - 10.2 Prior to any of EU IDs 4–10 becoming fully operational, the Permittee shall remove EU IDs 1 and 3 from service² and record the date(s).
 - a. In the operating report required by Condition 18, include the information recorded under Condition 10.2.

² Disconnect the fuel supply or otherwise prevent the emissions units from operating.

Section 5 Owner Requested Limits

Limits to Avoid Title V Permitting under 50.326

11. Nitrogen Oxides (NOx) Limit. The Permittee shall limit NOx emissions from EU IDs 2 and 4 through 10 to no more than 99 tpy.

11.1 Limit the NOx emissions from EU IDs 4 through 7 to no more than 57.8 tpy combined, by operating EU IDs 4 through 7 no more than 13,820 hours combined, per consecutive 12-month period. Monitor, record, and report as follows:

- a. Install and operate a non-resettable hour meter for recording operating hours on each of EU IDs 4 through 7.
- b. Record the hour meter reading for each of EU IDs 4 through 7 on the last operating day of each month.
- c. By the 15th of each month, calculate the combined hours of operation for EU IDs 4 through 7 during the previous month and add the previous month's combined operating hours for EU IDs 4 through 7 to the previous 11 month's combined operating hours.
- d. Report as follows:
 - (i) In the operating report required by Condition 18, include the information recorded under Conditions 11.1b and 11.1c.
 - (ii) Notify the Department in accordance with Condition 17 if the consecutive 12-month total for EU IDs 4 through 7 exceeds the limit in Condition 11.1.

11.2 Limit the NOx emissions from EU ID 2 to no more than 0.9 tpy by operating EU ID 2 no more than 1,700 hours per consecutive 12-month period. Monitor, record, and report as follows:

- a. Install and operate a non-resettable hour meter for recording operating hours on EU ID 2.
- b. Record the hour meter reading for EU ID 2 on the last operating day of each month.
- c. By the 15th of each month, calculate the hours of operation for EU ID 2 during the previous month and add the previous month's operating hours for EU ID 2 to the previous 11 month's total operating hours.
- d. Report as follows:
 - (i) In the operating report required by Condition 18, include the information recorded under Conditions 11.2b and 11.2c.
 - (ii) Notify the Department in accordance with Condition 17 if the consecutive 12-month total for EU ID 2 exceeds the limit in Condition 11.2.

11.3 Limit the NO_x emissions from EU IDs 8 and 9 to no more than 0.1 tpy each, by operating EU IDs 8 and 9 no more than 100 hours each, per consecutive 12-month period. Monitor, record, and report as follows:

- a. Install and operate a non-resettable hour meter for recording operating hours on each of EU IDs 8 and 9.
- b. Record the hour meter reading for each of EU IDs 8 and 9 on the last operating day of each month.
- c. By the 15th of each month, calculate the hours of operation for each of EU IDs 8 and 9 during the previous month and add the previous month's operating hours for each of EU IDs 8 and 9 to the previous 11 month's total operating hours.
- d. Report as follows:
 - (i) In the operating report required by Condition 18, include the information recorded under Conditions 11.3b and 11.3c.
 - (ii) Notify the Department in accordance with Condition 17 if the consecutive 12-month total for each of EU IDs 8 and 9 exceeds the limit in Condition 11.3.

11.4 Limit the NO_x emissions from EU ID 10 to no more than 40.2 tpy by operating EU ID 10 no more than 2,500 hours per consecutive 12-month period. Monitor, record, and report as follows:

- a. Install and operate a non-resettable hour meter for recording operating hours on EU ID 10.
- b. Record the hour meter reading for EU ID 10 on the last operating day of each month.
- c. By the 15th of each month, calculate the hours of operation for EU ID 10 during the previous month and add the previous month's operating hours for EU ID 10 to the previous 11 month's total operating hours.
- d. Report as follows:
 - (i) In the operating report required by Condition 18, include the information recorded under Conditions 11.4b and 11.4c.
 - (ii) Notify the Department in accordance with Condition 17 if the consecutive 12-month total for EU ID 10 exceeds the limit in Condition 11.4.

12. Carbon Monoxide (CO) Limit. The Permittee shall limit CO emissions from EU IDs 2 and 4 through 10 to no more than 43 tpy.

12.1 Comply with Conditions 11.1 through 11.4.

Section 6 Recordkeeping, Reporting, and Certification Requirements

- 13. Certification.** The Permittee shall certify any permit application, report, affirmation, or compliance certification submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: “Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.” Excess emissions reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.
- 13.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if
- a. a certifying authority registered under AS 09.80.020 verifies that the electronic signature is authentic; and
 - b. the person providing the electronic signature has made an agreement with the certifying authority described in Condition 13.1a that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.
- 14. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit one copy of each report, compliance certification, and/or other submittal required by this permit, via the Department’s Air Online Services (AOS) System at <http://dec.alaska.gov/applications/air/airtoolsweb/> using the Permittee Portal option.
- 14.1 Alternatively, the documents may be certified in accordance with Condition 13 and submitted either by:
- a. Email using dec.aq.airreports@alaska.gov; or
 - b. Certified mail to the following address: ADEC, Air Permits Program, ATTN: Compliance Technician, 610 University Ave., Fairbanks, AK 99709-3643.
- 15. Information Requests.** The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke, reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal Administrator.
- 16. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five-years after the date of collection, including:
- 16.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
 - 16.2 records of all monitoring required by this permit, and information about the monitoring including (if applicable):

- a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
- b. the date, location, and time of sampling or measurements;
- c. the operating conditions that existed at the time of sampling or measurement;
- d. the date(s) analyses were performed;
- e. the company or entity that performed the sampling and analyses;
- f. the analytical techniques or methods used in the analyses; and
- g. the results of the analyses.

17. Excess Emissions and Permit Deviation Reports.

17.1 Except as provided in Condition 20 the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. In accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that caused emissions in excess of a technology-based emissions standard;
- c. report all other excess emissions and permit deviations
 - (i) within 30 days after the end of the month during which the emissions or deviation occurred, except as provided in Condition 17.1c(iii); or
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under Condition 17.1c(i); and
 - (iii) for failure to monitor, as required in other applicable conditions of this permit.

17.2 When reporting either excess emissions or permit deviations, the Permittee shall report using either the Department's online form, which can be found at <http://dec.alaska.gov/applications/air/airtoolsweb>, or, if the Permittee prefers, the form contained in Attachment 2 of this permit. The Permittee must provide all information called for by the form that is used.

17.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

- 18. Operating Reports.** Submit to the Department an operating report by August 1 for the period January 1 through June 30 of the current year and by February 1 for the period July 1 through December 31 of the previous year. The report shall be submitted under a cover letter certified in accordance with Condition 13.
- 18.1 The operating report must include all information required to be in operating reports by other conditions of this permit, for the period covered by the report.
- 18.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 18.1, the Permittee shall identify
- a. the date of the deviation;
 - b. the equipment involved;
 - c. the permit condition affected;
 - d. a description of the excess emissions or permit deviation; and
 - e. any corrective action or preventative measures taken and the date of such actions; or
- 18.1 When excess emissions or permit deviations have already been reported under Condition 17 the Permittee shall cite the date or dates of those reports.
- 19. Annual Affirmation.** The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 13 of whether the stationary source is still accurately described by the application and this permit, and whether any changes have been made to the stationary source that would trigger the requirement for a new permit under 18 AAC 50.
- 20. Air Pollution Prohibited.** No person may permit any emissions 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.
- 20.1 If emissions present a potential threat to health or safety, the Permittee shall report any such emissions according to Condition 17.
- 20.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 20.
- 20.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
- a. after investigation because of complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of Condition 20 or
 - b. the Department notifies the Permittee that it has found a violation of Condition 20.

20.4 The Permittee shall keep records of

- a. the date and time, and nature of all emissions complaints received;
- b. the name of the person or persons that complained, if known;
- c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 20; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

20.5 With each operating report under Condition 18, the Permittee shall include a brief summary report which must include

- a. the number of complaints received;
- b. the number of times the Permittee or the Department found corrective action necessary;
- c. the number of times action was taken on a complaint within 24 hours; and
- d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.

20.6 The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

Section 7 Standard Permit Conditions

- 21.** The Permittee must comply with each permit term and condition. Non-compliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for
 - 21.1 an enforcement action; or
 - 21.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
- 22.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
- 23.** Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
- 24.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- 25.** The permit does not convey any property rights of any sort, nor any exclusive privilege.
- 26.** The Permittee shall allow the Department or an inspector authorized by the Department upon presentation of credentials and at reasonable times with the consent of the owner or operator to
 - 26.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 26.2 have access to and copy any records required by this permit;
 - 26.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 26.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 8 General Source Test Requirements

- 27. Requested Source Tests.** The Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.
- 28. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
- 28.1 at a point or points that characterize the actual discharge into the ambient air; and
 - 28.2 at the maximum rated burning or operating capacity of the source or another rate determined by the Department to characterize the actual discharge into the ambient air.
- 29. Reference Test Methods.** The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:
- 29.1 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in 40 C.F.R. 60, Appendix A, Reference Method 9. The Permittee may use the form in Attachment 1 of this permit to record data.
 - 29.2 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.
- 30. Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.
- 31. Test Plans.** Before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance, and must specify how the emissions unit will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete test plan at least 30-days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.
- 32. Test Notification.** At least 10-days before conducting a source test, the Permittee shall give the Department written notice of the date and time the source test will begin.
- 33. Test Reports.** Within 60-days after completing a source test, the Permittee shall submit two copies of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results as set out in Condition 13. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.
- 34. Test Exemption.** The Permittee is not required to comply with Conditions 31, 32 and 33 when the exhaust is observed for visible emissions by Method 9 Plan.

Section 9 Permit Documentation

<u>Date</u>	<u>Document Details</u>
July 9, 2018	Golden Harvest submits application for a minor permit with ORL under 18 AAC 50.508(5), as directed by the Department.
July 11, 2018	Department receives email request to stop work on minor permit until an amended application can be submitted.
July 20, 2018	Department receives amended application and resumes work on Minor Permit AQ1373MSS02.

Attachment 1 – Visible Emissions Form

VISIBLE EMISSION OBSERVATION FORM

This form is designed to be used in conjunction with EPA Method 9, “Visual Determination of the Opacity of Emissions from Stationary Sources.” Temporal changes in emission color, plume water droplet content, background color, sky conditions, observer position, etc. should be noted in the comments section adjacent to each minute of readings. Any information not dealt with elsewhere on the form should be noted under additional information. Following are brief descriptions of the type of information that needs to be entered on the form: for a more detailed discussion of each part of the form, refer to “Instructions for Use of Visible Emission Observation Form.” <https://www3.epa.gov/ttnemc01/methods/webinar8.pdf>

- Source Name: full company name, parent company or division or subsidiary information, if necessary.
- Address: street (not mailing or home office) address of facility where visible emissions observation is being made.
- Phone (Key Contact): number for appropriate contact.
- Stationary Source ID Number: number from NEDS, agency file, etc.
- Process Equipment, Operating Mode: brief description of process equipment (include type of facility) and operating rate, % capacity, and/or mode (e.g. charging, tapping, shutdown).
- Control Equipment, Operating Mode: specify type of control device(s) and % utilization, control efficiency.
- Describe Emission Point: for identification purposes, stack or emission point appearance, location, and geometry; and whether emissions are confined (have a specifically designed outlet) or unconfined (fugitive).
- Height Above Ground Level: stack or emission point height relative to ground level; can use engineering drawings, Abney level, or clinometer.
- Height Relative to Observer: indicate height of emission point relative to the observation point.
- Distance from Observer: distance to emission point; can use rangefinder or map.
- Direction from Observer: direction plume is traveling from observer.
- Describe Emissions and Color: include physical characteristics, plume behavior (e.g., looping, lacy, condensing, fumigating, secondary particle formation, distance plume visible, etc.), and color of emissions (gray, brown, white, red, black, etc.). Note color changes in comments section.
- Visible Water Vapor: If visible water vapor is present, note it in the comments section.
- If Plume is present, note in Comments section... “attached” if water droplet plume forms prior to exiting stack, or “detached” if water droplet plume forms after exiting stack.
- Point in Plume at Which Opacity was Determined: describe physical location in plume where readings were made (e.g., 1 ft above stack exit or 10 ft. after dissipation of water plume).
- Describe Plume Background: object plume is read against, include texture and atmospheric conditions (e.g., hazy).
- Background Color: sky blue, gray-white, new leaf green, etc.
- Sky Conditions: indicate cloud cover by percentage or by description (clear, scattered, broken, overcast).
- Wind Speed: record wind speed; can use Beaufort wind scale or hand-held anemometer to estimate.
- Wind Direction From: direction from which wind is blowing; can use compass to estimate to eight points.
- Ambient Temperature: in degrees Fahrenheit or Celsius.
- Wet Bulb Temperature: can be measured using a sling psychrometer
- RH Percent: relative humidity measured using a sling psychrometer; use local US Weather Bureau measurements only if nearby.
- Source Layout Sketch: include wind direction, sun position, associated stacks, roads, and other landmarks to fully identify location of emission point and observer position.
- Draw North Arrow: to determine, point line of sight in direction of emission point, place compass beside circle, and draw in arrow parallel to compass needle.
- Sun’s Location: point line of sight in direction of emission point, move pen upright along sun location line, mark location of sun when pen’s shadow crosses the observer’s position.
- Observation Date: date observations conducted.
- Start Time, End Time: beginning and end times of observation period (e.g., 1635 or 4:35 p.m.).
- Data Set: percent opacity to nearest 5%; enter from left to right starting in left column. Use a second (third, etc.) form, if readings continue beyond 30 minutes. Use dash (-) for readings not made; explain in adjacent comments section.
- Comments: note changing observation conditions, plume characteristics, and/or reasons for missed readings.
- Range of Opacity: note highest and lowest opacity number.
- Observer’s Name: print in full.
- Observer’s Signature, Date: sign and date after performing VE observation.
- Organization: observer’s employer.
- Certified By, Date: name of “smoke school” certifying observer and date of most recent certification.

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR QUALITY DIVISION - VISIBLE EMISSIONS OBSERVATION FORM									
Page No. _____									
Source Name		Type of Source		Observation Date		Start Time		End Time	
Address		City		State		Zip		Sec	
								0 15 30 45	
Comments		Min		1					
Phone # (Key Contact)		Source ID Number		2					
Process Equipment		Operating Mode		3					
Control Equipment		Operating Mode		4					
Describe Emission Point				5					
Height above ground level		Height relative to observer		Inclinometer Reading		6			
Distance From Observer		Direction From Observer		Start		End		8	
Describe Emissions & Color		Start		End		9			
Visible Water Vapor Present? If yes, determine approximate distance from the		No		Yes		stack exit to where the plume was read		10	
Point in Plume at Which Opacity Was Determined				11					
Describe Plume Background		Background Color		Start		End		12	
Sky Conditions: Start				13					
Wind Speed		Wind Direction From		Start		End		14	
Ambient Temperature		Wet Bulb Temp		RH percent		15			
NOTES: 1 Stack or Point Being Read 2 Wind Direction From				16					
3 Observer Location 4 Sun Location 5 North Arrow 6 Other Stacks				17					
				18					
				19					
				20					
				21					
				22					
				23					
				24					
				25					
				26					
				27					
				28					
				29					
				30					
Range of Opacity				Minimum		Maximum			
I have received a copy of these opacity observations				Print Observer's Name					
Print Name:				Observer's Signature		Date			
Signature:									
Title		Date		Organization					
Certified By:				Date					

Attachment 2 - ADEC Notification Form

Adak Seafood Processing Facility

Stationary Source Name

Golden Harvest Alaska Seafood, LLC

Company Name

AQ1373MSS02

Air Quality Permit No.

Date

When did you discover the Excess Emissions/Permit Deviation?

Date: ____ / ____ / ____

Time: ____ : / ____

When did the event/deviation occur?

Begin Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock.)

End Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock.)

What was the duration of the event/deviation?

: ____ (hrs:min) or ____ days

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

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

- ☐ Excess Emissions – Complete Section 1 and Certify
- ☐ Deviation from Permit Condition – Complete Section 2 and Certify
- ☐ Deviations from COBC, CO, or Settlement Agreement – Complete Section 2 and Certify

Section 1. Excess Emissions

(a) Was the exceedance: ☐ Intermittent or ☐ Continuous

(b) Cause of Event (Check one that applies):

☐ Start Up/Shut Down

☐ Natural Cause (weather/earthquake/flood)

☐ Control Equipment Failure

☐ Schedule Maintenance/Equipment Adjustment

☐ Bad Fuel/Coal/Gas

☐ Upset Condition

☐ Other

(c) Description

Describe briefly, what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance.

(d) Emissions Units Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the permit. Identify each emission standard potentially exceeded during the event and the exceedance.

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

(e) Type of Incident (please check only one):

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

(f) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable? ☐ Yes ☐ No

Do you intend to assert the affirmative defense of 18 AAC 50.235? ☐ Yes ☐ No

Certify Report (go to end of form.)

Section 2. Permit Deviations

(a) Permit Deviation Type (check only one box, corresponding with the section in the permit):

- | | |
|---|--|
| <input type="checkbox"/> Emission Unit-Specific | <input type="checkbox"/> Generally Applicable Requirements |
| <input type="checkbox"/> Failure to Monitor/Report | <input type="checkbox"/> Reporting/Monitoring for Diesel Engines |
| <input type="checkbox"/> General Source Test/Monitoring Requirements | <input type="checkbox"/> Recordkeeping Failure |
| <input type="checkbox"/> Recordkeeping/Reporting/Compliance Certification | <input type="checkbox"/> Insignificant Emission Unit |
| <input type="checkbox"/> Standard Conditions Not Included in the Permit | <input type="checkbox"/> Stationary Source Wide |
| <input type="checkbox"/> Other Section: _____ (Title of section and section number of your permit). | |

(b) Emission Unit Involved:

Identify the emission units involved in the event, using the same identification number and name as in the permit. List the corresponding permit conditions and the deviation.

EU ID	EU Name	Permit Condition/ Potential Deviation

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

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation.

(d) **Corrective Actions:**

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence.

Certification:

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

Printed Name: _____ Title: _____ Date: _____
Signature: _____ Phone Number: _____

NOTE: *This document must be certified in accordance with 18 AAC 50.345(j)*

To Submit this Report:

1. Fax to: 907-451-2187

Or

2. Email to: DEC.AQ.Airreports@alaska.gov

If faxed or emailed, the report must be certified within the operating report required for the same reporting period per Condition 18.

Or

3. Mail to: ADEC
 Air Permits Program
 610 University Avenue
 Fairbanks, AK 99709-3643

Or

4. Phone Notification: 907-451-5173

Phone notifications require a written follow-up report.

Or

5. Submission of information contained in this report can be made electronically at the following website: <http://dec.alaska.gov/Applications/Air/airtoolsweb/>