



**DEPARTMENT OF THE AIR FORCE**  
**354TH FIGHTER WING**

**MAY 30 2019**

MEMORANDUM FOR ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
ATTN: AIR PERMIT INTAKE TECHNICIAN  
555 Cordova Street  
Anchorage AK 99501

FROM: 354 FW/CC  
354 Broadway St Unit 19A  
Eielson AFB AK 99702-1899



SUBJECT: Addendum to Title V Permit Renewal Application, United States Air Force, Eielson Air Force Base (EAFB) (Permit Number [No.] AQ0264TVP03A).

1. The United States Air Force (USAF) is submitting an addendum to the application for renewal of its Title V operating permit for EAFB that was submitted in October 2017. Although the USAF is currently permitted under AQ0264MSS05 and AQ0264TVP02 to remove and replace (one-at-a-time) the coal-fired boilers at the EAFB Central Heat and Power Plant (CH&PP) over a several year period, the USAF would like to add text to the Title V Permit to clarify that it is not required or obligated to procure and install the replacement boilers as a result of the Title V and Minor Permits. At this time, the USAF has completed removal of existing coal-fired boilers (emission unit identification [EU ID] numbers) 6 and 5 and completed installation and startup (as well as initial compliance demonstration activities) of replacement boilers EU IDs 6A and 5A, which corresponds with completing Stage 2 of the boiler replacement project. This letter is intended to request that the Alaska Department of Environmental Conservation (ADEC) add text/language to Condition 20 to reflect this clarification in the Title V Permit Renewal Application that is currently being processed by the ADEC.
2. In support of this request, the USAF is including the Attachment to this letter, which includes an updated Alternate Form E3 and updated redline strikeout of the current Title V Permit No. AQ0264TVP02 text and language to reflect this request. Changes to the originally submitted Alternate Form E3 are shown in red-text and changes to the originally submitted redline strikeout are shown in purple text in the Attachment. No changes are requested for existing Minor Permit AQ0264MSS05.
3. 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. If you have any questions regarding this matter, please contact Kevin Villalobos, Air Program Manager at (907) 377-1815.

BISHOP.BENJAMI  
N.W.1096793061  
BENJAMIN W. BISHOP, Colonel, USAF  
Commander

Digitally signed by  
BISHOP.BENJAMIN.W.1096793061  
Date: 2019.05.30 09:48:00 -08'00'

Attachment:  
Revised Alternate Form E3 with Title V Permit Renewal Condition 20 Addendum

cc:  
Kelly McFadden, USEPA, Seattle, WA 98101



**Alt Form E3 - Title V Condition Change Request**

Permit Number: AQ0264TVP03

(Refer to Att E3-1 Title V Permit markup for changes described below)

Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Per -1	Entire permit	Revise	Correct minor typographical errors as indicated throughout TVP markup.	
Sec 1	Section 1 Identification	Revise	Update names and addresses that have changed since last Title V permit revision, and add NAICS code.	
Tab A-1	Table A	Revise	Show table footnotes as letters rather than numbers to differentiate from page footnotes	
Tab A-2	Table A	Revise	Remove Emission Unit (EU) IDs 5, 6, 27, 42, and 123. The have been decommissioned and removed from source.	
Tab A-3	Table A	Revise	Update emission unit descriptions, rating, installation dates, or building locations per recent emission inventory review and update as indicated below. These are corrections, and are NOT due to any modifications to unit.  *EU IDs 1 - 6A: Update Rating/Size, and install dates, add EU ID 5A and 6A emission unit description. *EU ID 7 & 8: The heat input rating revised upward based on information provided by manufacturer. *EU ID 13&14, 24, 52, 75, 79, 81, 110, 64A, 112: Corrected building number. *EU ID 17&18: The heat input rating revised downward based on information provided by manufacturer. Output rating is 13.5 MMBtu/hr, and input rating is 14,673,913 BTU/hr). *EU ID 19, 20-23, 26, 28, 30-32, 34, 49, 51, 52, 55, 57&58, 76, 113-118, 120&121: Corrected emission unit description.  *EU ID 24-26, 28, 30-34, 49-56, 59, 60, 62, 71-78, 64A, 64B, 112-115, 117-122, 124, 125, 129: Revised input rating based on engine plate on unit. Previous rating was based on generator output.  *65 - 69: Corrected rating, model, and install date from 1970 to 2015 (2010 for EU ID 69).  *116: Replacement unit in 2011 per USAF. *120: Install date changed from 1999 to 2001. *126-128: Add "UST" to description to indicate Underground Storage Tanks.	
Tab A-4	Table A	Revise	Update incorrect ratings for EU IDs 20 - 23 to show maximum rating as indicated in column heading. The current permit shows the ratings as limited in Condition 19. (Note that the limit has been revised based on a new source test as allowed in the condition.) This is not a modification to the emission units.	
Tab A-5	Table A	Revise	Update EU ID's 35A - 37A, 65A - 68A, and 70A per off-permit change notifications provided to ADEC. Added footnote indicating that manufacturer date for EU ID 70A is still 1970, so updated installation did not trigger NSPS Subpart IIII or NESHAPS Subpart ZZZZ.	
Tab A-6	Table A	Revise	Remove EU ID 85 (fire training) and EU IDs 106 & 107. These units are insignificant on an actual emission basis and are not subject to any permit limit or federal standard, so they are not required to be listed in Table A. Add footnote b.	

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Tab A-7	Table A	Revise	Update the table so that the emission units are arranged in numerical order (to extent possible) under each emission unit type heading. Remove the heading "Insignificant CE RICE Subject to NESHAP Subpart ZZZZ" and list these units under "Diesel and Gasoline Fired Internal Combustion Engines" <b>but include footnote</b> . Change the heading of "Insignificant Gasoline Storage Tanks Subject to NESHAP Subpart CCCCCC" to "Gasoline Storage Tanks" (or just "Storage Tanks") and <b>include footnote</b> . The fact that a unit is significant just because of a permit or federal limit can be handled in a footnote. The table does not specify other units that could be insignificant on an emission rate bases but are not insignificant due to the permit requirement or federal limit, so is inconsistent as written. Further the current table does not specify all EUs subject to a federal requirement, so including for just some of the units is inconsistent. Add footnote e that describes permit conditions and federal requirements ONLY for those units that may be insignificant on an emission rate basis (i.e. did not include provisions that apply to EU IDs 1-6A because these units are significant on an emission rate basis, as well as being subject to permit limits and federal requirements).	
Tab A-8	Table A	Revise	Add footnotes c and d designating units that are insignificant (on emission rate basis), and whether this is based on actual emissions or potential emission. (None of these units meet definition of insignificant in ADEC regulations because they are subject to a permit limit or federal standard.)	
Tab A-9	Table A	Revise	Remove obsolete footnotes as indicated.	
Tab A-11	Table A	Add	Add footnote g to indicate all IC engines are emergency, except EU IDs 20-23 and 82-84.	
Tab A-12	Table A	Add	Add footnote h to indicate that, although the rock crusher units are portable, the engines are considered stationary because the stay in one place for more than 12 consecutive months.	
Tab A-10	Table "B"	New	Add table or condition that shows throughput or operating hours that would make each of the units listed in footnote c to Table A significant on an emission rate basis. Will need to renumber subsequent tables (not shown on markup).	
Con 1-1	Condition 1	Revise	Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units, here and throughout permit. Exclude EU IDs 27, 42, and 123 from condition and subconditions.	
Con 1-2	Conditions 1.1 - 1.8	Revise	Edit so that significant (only due to permit or federal requirement) industrial process or fuel-burning EU that is insignificant based on emissions is referred to the state standard MR&R for insignificant units in Condition 38 of the current permit. For <b>all units</b> that are insignificant, monitoring shall consist of an annual compliance certification in Condition 38 and 138 with opacity standard.	
Con 1-3	Conditions 1.1 - 1.8	Revise	Clarify and streamline the different categories for VE monitoring. Remove the separate category for rock crusher engines. These can be treated the same as the other engines in this Title V permit. These conditions are not Title I provisions so does not need to be changed in a Title I permit. The only necessary categories are as listed below: a. Liquid fuel-fired units, unless insignificant b. Gaseous fuel-fired units c. Fugitive emission units c1. Rock crusher fugitive, unless insignificant c2. Coal Prep Plant, unless insignificant d. All insignificant units	

**Alt Form E3 - Title V Condition Change Request**

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Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Con 2-1	Condition 2	Revise	Remove EU IDs 63, 75, 76, 77, 78, and 80 (they have completed requirement).	
Con 2-2	Condition 2.2	New	Allow any new or replaced units that are insignificant on an emission rate basis (regardless of any other permit limits or federal requirements) to follow VE/Opacity MR&R for insignificant units.	
Con 3-1	Condition 3	Revise	The condition does not need to specify EU ID. Condition 1.1 requires this monitoring for all significant liquid fuel-fired equipment. The FOR will list the units that used this condition.	
Con 3-2	Condition 3.1a	Revise	The condition does not need to specify EU ID. If, at any time, a unit is no longer insignificant under condition 1.5, the unit must start complying with condition 3.1a.	
Con 3-3	Condition 3.1a	Revise	Add provision indicating when the first Method 9 observation is due for any new unit in general. Delete reference to EU IDs 15, 16, 72, and 79. The initial observation is covered under Condition 2.	
Con 6	Condition 6	Delete	Delete condition. The rock crusher engines can be treated the same as the other engines in this Title V permit. These conditions are not Title I provision so do not need to be changed in a Title I permit. This condition can be deleted under 18 AAC 50.510 which states: "A term or condition established in a minor permit issued under 18 AAC 50.542 and identified in the minor permit as solely necessary to meet a Title V operating permit requirements to qualify as an operating permit administrative amendment under 18 AAC 50.542(e) and 40 C.F.R. 71.7(d), adopted by reference in 18 AAC 50.040(j), is considered a Title V term or condition upon incorporation into a Title V permit. A subsequent revision to the term or condition may be made solely through the applicable Title V operating permit amendment or modification provisions of 18 AAC 50.326."	
Con 7-1	Condition 7 and heading	Revise	Include listing of all individual emission units in condition to facilitate document searching for applicable conditions for individual emission units. Delete the listing from the heading for consistency throughout permit and to reduce repetition. <u>This applies in general, unless the heading provides additional information.</u>	
Con 7 - 2	Condition 7	Revise	Allow units that are insignificant on an emission rate basis (regardless of any other permit limits or federal requirements) to follow VE/Opacity MR&R for insignificant units.	
Con 10-1	Condition 10	Revise	List each unit, and remove 27, 42, and 123 (removed from source).	
Con 10-2	Condition 10.1 - 10.5	Revise	Edit so that significant (only due to permit or federal requirement) industrial process or fuel-burning EU that is insignificant based on emissions is referred to the state standard MR&R for insignificant units in Condition 38 of the current permit. For <b>all units</b> that are insignificant, monitoring shall consist of an annual compliance certification in Condition 38 and 138 with PM standard. New Condition 10.3 specifies that the units have to be insignificant in order to use the insignificant unit monitoring so current conditions 10.2 and 10.4 are unnecessary.	
Con 12	Condition 12	Revise	Clarify that this condition only applies to significant liquid fuel fired engines as indicated in Condition 10.1	
Con 13	Condition 13	Revise	Remove EU ID 80, provision is complete.	
Con 15	Condition 15	Revise	Clarify that this condition only applies to significant liquid fuel fired boilers as indicated in Condition 10.1	
Con 18-1	Condition 18, 18.1	Revise	Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units. Exclude 27, 42, and 123 as they have been removed from source.	
Con 18-2	Condition 18.1 lead-in	Revise	Delete listing of EU IDs in headings as the EU IDs are provided in conditions, here and throughout permit. If appropriate, include a descriptive heading.	

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Con 18-3	Condition 18.1	Revise	Proposed language clarifies that USAF will comply with the state sulfur emission limit of 500 ppm by complying with condition 22 requiring 0.15 wt% sulfur for ambient air quality protection for the fuel oil fired units that are subject to that condition. Note that Condition 18.1 is not a Title I provision, just Conditions 18.2 to 18.4 support the Title 1 fuel sulfur limit in Condition 22. Would prefer these conditons be included under Condition 22. In any event, conditions 18.2 to 18.4 should be shown as subconditions of 18.1. To be consistent with heading, EU IDs 17 and 18 are not included in Condition 18.1, as indicated in the SOB, no MR&R is necessary.	
Con 18-4	Condition 18.6	Revise	Add appropriate units (EU IDs 35A - 38A, 65A - 68A, and 83 that are subject to fuel sulfur requirements in NSPS Subpart IIII (along with EU ID 64A and 64B).	
Con 18-6	Condition 18.7	Revise	Revise condition to include units not included in previous monitoring. EU IDs 83 is subject to ULSD requirements in NSPS Subpart IIII, and is covered under Condition 18.6, same as 64A and 64B.	
Con 19-1	Condition 19	Revise	List individual emission units.	
Con 19-2	Condition 19.2	Revise	Revise maximum allow operating load for EU ID 19 to 1,425 kW. ADEC approved the source test data in support of this limit change as described in a letter dated 1/27/2014 (Att E3-1).	
Con 20-1	Condition 20	Revise	Add "Coal-fired" to condition lead in to clarify condition only applies to coal boilers. <b>USAF/Eielson Air Force Base (AFB) is authorized but not obligated/required to remove the existing coal-fired boilers and install the replacement boilers (i.e., operation is permitted at each project stage as defined in the Title V Permit and Minor Permit AQ0264MSS05).</b>	
Con 20-2	Condition 20.1	Revise	Correct typographical errors made in carrying this condition over from Permit No. AQ0264MSS05.	
Con 20-3	Condition 20 Table B	Revise	Remove replacement Stage 1 - completed, currently operating at the end of Stage 2. (The removal and replacement of EU ID 5 to 5A was completed in May 2017.)	
Con 22	Condition 22.1	Revise	EU IDs 27, 42, and 123 have been removed from the source. Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units.	
Con 24	Condition 24	Revise	EU IDs 27 and 42 have been removed from the source. Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units. The list does not need to be repeated in Condition 24.2a or b however.	
Con 25	Condition 25.1a	Revise	Fix cross reference to Condition 65, Subpart Dc Fuel Consumption.	
Con 26	Condition 26	Delete	Please provide the basis for the 18,000,000 fuel throughput for EU IDs 104 and 105. There is no underlying basis provided in the SOB.	
Con 28	Condition 28.2	Revise	Revise reporting to agree with monitoring in Condition 28.1.d. The condition does not require fuel consumption on a monthly basis.	
Con 29	Condition 29	Revise	Remove requirement to provide first verification of the FITR setting on EU ID 19 within 60 days, USAF has complied with this. USAF is not requesting to remove the ongoing requirement to verify setting no less than every 12 months.	
Con 31	Condition 31	Revise	List EU IDs individually.	
Con 33	Condition 33	Revise	List EU IDs individually.	
Con 34	Condition 34	Revise	EU ID 123 has been removed from the source. Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units.	

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Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Con 35-1	Condition 35	Revise	Update the maximum steam load limit to 1.1* the stack test steam load as provided in NESHAPS 6J. The stack test for EU ID 5A was conducted at 118,680 lb steam/hr (average for all 3 runs) and for EU ID 6A at 118,240 lb steam/hr (average for all 3 runs), thus limits should be 130,500 lb steam/hr and 130,000 lb steam/hr for EU ID 5A and 6A, respectively. Conditions 1, 2, 4, nor 6 of Minor Permit No. AQ0264MSS05 do not include a specific steam production limitation for coal consumption nor PM to support this current 120,000 lb/hr steam limit. The NESHAP 6J PM limit of 0.03 lb/MMBtu is also more stringent than this 0.05 gr/dscf limit (using Method 19, Equation 19-1, Fd=9,780 and 8% O2, the NESHAP 6J PM limit of 0.03 lb/MMBtu = 0.0135 gr/dscf < 0.05 gr/dscf PM limit in Condition 42.2 of Permit AQ0264TVP02 and Condition 6.1 of Minor Permit No. AQ0264MSS05).	
Con 35-2	Condition 35.2.a	Revise	Revise text to match Condition 4.1.a of Minor Permit No. AQ0264MSS05. Existing boilers (EU IDs 1-4) are not technically capable of tracking their individual coal usage; however, coal usage for the entire CHPP and individually for the replacement boilers (EU IDs 5A, 6A) is tracked on a daily and monthly basis for compliance with this condition.	
Con 36	Condition 36.6	Revise	Correct typographical error for Table reference.	
Con 38	Condition 38	Revise	Update per requested changes to Table A and to allow all insignificant units (i.e. the incinerator and losts of tanks) to refer to this condition.	
Con 42	Condition 42.3	Revise	Revised text to remove EU IDs 5 and 6 which have been removed from the installation (replaced by EU IDs 5A and 6A, refer to Condition 35.1), and to revise steam production limits based on the most recent (2015) stack testing of EU IDs 1-4 (average steam production during all 3 test runs).	
Con 50-1	Condition 50 (heading)	Revise	Added note to qualify the date/version of the federal regulations included below (as regulations may be revised after the revised permit and may not be immediately incorporated into the conditions below).	
Con 50-2	Condition 50.2	Revise	Corrected Subpart Dc references to NSPS Subpart A (40 CFR 68c(a) and (c) reference applicable conditions in NSPS Subpart A).	
Con 51	Condition 51	Revise	Update with units now subject to NSPS. However, if listed once, can refer to list subsequently if appropriate.	
Con 52	Condition 52	Revise	Update with units now subject to NSPS.	
Con 68-1	Italic heading before Condition 68	Delete	The heading in italics is not needed as the EU IDs are listed in the condition and we want to reduce repetition. The heading in bold provides a good general heading.	
Con 68-2	Condition 68, 68a, 68.4	Revise	List EU IDs individually.	
Con 68-3	Condition 68	Revise	Add units subject to Subpart IIII according to manufacturer dates provided in recent emission inventory review and update (EU ID 112 and 116) and off permit changes (EU ID 35A - 37A, 65A - 68A). As indicated above, under Table A revisions, the revisions to EU IDs 112 and 116 are corrections, and are NOT due to any modifications to unit. Edits also reflect that EU IDs 82 and 84 are NOT subject to NSPS Subpart IIII due to their mfg dates.	
Con 68-4	Condition 68	Revise	Fix language to agree more closely with NSPS Subpart IIII language in 40 CFR 60.4200(a).	

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Con 68-5	Condition 68.3a	Revise	Add EU ID 35A - 37A, 65A - 68A, 112, and 116, in accordance with 40 CFR 60.4214 (b), "If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to this subpart, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that tim. (EU IDs 83 is non-emergency, but is less than 3,000 hp so not subject to any notification requirements under 40 CFR 60.4214(a).	
Con 68-5	Condition 68.4	Revise	Add EU ID 35A - 37A, 65A - 68A, 112, and 116 because these are emergency stationary ICes. (EU ID 83 is non-emergency.)	
Con 69-1	Condition 69	Revise	streamline condition	
Con 69-2	Condition 69	Revise	Fix NSPS Subpart IIII citation to more accurately reflect condition.	
Con 70-1	Condition 70	Revise	Add EU ID 35A - 37A, 65A - 68A, 112, and 116 because these are subject to NSPS Subpart IIII listed in subconditions. Removed 82 and 84 as they are not subject to NSPS Subpart IIII. List EU IDs individually.	
Con 70-2	Condition 70.1	Revise	Clarify that Permitte may use methods listed in Condition 71.2.	
Con 70-3	Condition 70.2	Revise	Add EU ID 65A - 68A, 112 and 116 because these emergency, 2007 model year and later, and clarify that this subcondition does not include fire pump engines.	
Con 70-4	Condition 70.2	Revise	Add citation that references manufacturer certification.	
Con 70-5	Condition 70.3	New	Add new NSPS provisions for emergency firepump engines (EU IDs 35A – 37A).	70.3
Con 70-6	Condition 70.4	Revised	Formerly Condition 70.3. Clarify that Permitte may use methods listed in Condition 71.2.	
Con 70-7	Condition 70.4	Revised	Formerly Condition 70.3. Removed 82 and 84 as they are not subject to NSPS Subpart IIII.	
Con 71-1	Condition 71.1	Revise	Clarify that subcondition apply only to emergency engines, and only if the engine does not meet the standards applicable to non-emergency engines. Add EU ID 35A - 37A, 65A - 68A, 112, and 116 because these are emergency engines. List EU IDs individually.	
Con 71-2	Condition 71.2	Revise	EU ID 82 and 84 are not subject to NSPS Subpart IIII.	
Con 71-3	Condition 71.2a	Revise	The engines at EAFB are certified according to 40 CFR 89 and not 40 CFR 94.	
Con 71-4	Condition 71.3	Revise	Also applies to fire pump engines (EU ID 35A - 37A) (added per off permit change) and EU IDs 112 and 116 (manufacturer date updated).	
Con 71-5	Condition 71.3a	Revise	Add fire pump engines language from Subpart IIII.	
Con 71-6	Condition 71.3a	Revise	This condition does not pertain to non-emergency engines, so can remove reference to 40 CFR 60.4204(b).	
Con 71-7	Condition 71.4	Revise	EU IDs 82 and 84 are not subject to Subpart IIII.	
Con 71-8	Condition 71.4	Revise	The current language is contradictory because Conditions 71.4a - 71.4d would only apply if certificates of conformity from the manufacturer were NOT available (40 CFR 60.4212(a)).	

**Alt Form E3 - Title V Condition Change Request**

Permit Number: AQ0264TVPO3

(Refer to Att E3-1 Title V Permit markup for changes described below)

Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Con 73-1	Heading for Subpart OOO conditions	Delete	EU IDs are listed in each condition and this lead in is repetitive. Delete.	
Con 73-2	Condition 73	Revise	EU ID 97 is only exempt from the PM standard in 40 CFR 60.672, not the entire subpart.	
Con 74-1	Condition 74	Revise	Add individual EU IDs, except EU ID 97, which is exempt from the PM standard in 40 CFR 60, Subpart OOO.	
Con 74-2	Condition 74.3	Revise	Revise condition 74.3. Include permit shield in Form B9.4. EU ID 97 is exempt from PM standard in Subpart OOO.	
Con 75	Condition 75	Revise	Correct typographical error.	
Con 76	Condition 76	Revise	Correct typographical error.	
Con 77	Condition 77	Revise	Correct typographical error.	
Con 78	Condition 78	Revise	Add segment crusher component of EU ID 110. It became an affected facility in 2013, see off permit change notification dated 7/3/2013.	
Con 81-1	Condition 81.1b	Revise	Fix formatting of condition 81.1b and subconditions. Condition 81.1b should be 81.2, Condition 81.1b(i) should be 81.2a, Condition 81.1. Also, fix the reference to "paragraphs (e) and (f)" in Condition 81.1b(i). There is no paragraph (e) and (f) in this section. In (current) Condition 81.1c, can delete "for EU ID 111" if formatting fixed. Formatting looks good again in Condition 81.1c(i).	
Con 81-2	Condition 81.1c	Revise	Revise to require the performance test on only one of the six identical bin vents. Eielson has submitted this request, but has not yet heard back with approval.	
Con 85	Condition 85	Revise	<b>Eielson AFB is currently an Area Source of HAP (due to an owner requested limit, Condition 37), at the time of promulgation of NESHAP Subpart GG Eielson was a Major Source of HAP and subject to Subpart GG - therefore, Eielson was still subject to NESHAP Subpart GG as an Area Source per the previous "once in, always in" EPA policy from May1995 - however; this policy has been superseded by EPA in the 28 Feb 2018 Federal Register Notice (effective 8 Feb 2018), and Eielson is no longer subject to the NESHAP Subpart GG due to being an Area Source of HAP. <del>In addition to the surface-coating/cleaning operations at the Corrosion Control Shop, revised with a new sub-paragraph to include the Aerospace NESHAP-subject cleaning operations at other aircraft maintenance shops and buildings at Eielson AFB, which are also regulated under the solvent cleaning provisions of 40 CFR 63.744.</del></b>	
Con 86-1-	Condition 86 (heading)	Revise	Unupdate to reflect current emission unit list subject to Subpart ZZZZ. In this case, appropriate to leave this heading in because it provides the entire list of units subject to Subpart ZZZZ.	
Con 86-2	Condition 86	Revise	Revised to clarify all units subject to Subpart ZZZZ and whether they are existing or new, based on off permit changes and recent inventory review. EU IDs 19-80, 82-84, 112 - 125, and 129 are subject to Subpart ZZZZ. (EU IDs 27, 42, and 123 have been removed from the source). Of these, "new under Subpart ZZZZ" units are EU IDs 30, 33, 35A, 36A, 37A, 50, 56, 63, 64A, 64B, 65A, 66A, 67A, 68A, 72, 73, 74, 75, 77, 78, 79, 80, 83, 112, 116, 119, 124, 125, and 129. The remaining are existing (EU IDs 19, 20, 21, 22, 23, 24, 25, 26, 28, 29, 31, 32, 34, 38, 39, 40, 41, 43, 44, 45, 46, 47, 48, 49, 51, 52, 53, 54, 55, 57, 58, 59, 60, 61, 62, 69, 70A, 71, 76, 82, 84, 113, 114, 115, 117, 118, 120, 121, and 122)	
Con 86-3	Condition 86	Revise	Minor revisions for clarity,	

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Con 86-4	Condition 86.6	Revise	Update to reflect "existing" and "new" institutional or commercial emergency RICE at an area source under Subpart ZZZZ. EU IDs 35A - 40A and 120 are now new. The revised list of existing institutional or commercial units at an area source is: 25, 29, 32, 38, 39, 40, 41, 43, 44, 45, 46, 47, 48, 4935 - 49, 57, 58, 59, 60, 61, 6257 - 62, 76, 120, 121, and 122.	
Con 86-5	Condition 86.6	Revise	Add correct citation and delete non-existent citations.	
Con 86-6	Condition 86.7	Revise	Add EU IDs 35A - 38A, and 65A - 68A, 112, and 116 that are "new" under Subpart ZZZZ. Remove 82 and 84 as they are "existing."	
Con 86-7	Condition 86.7	Revise	Correct cross reference.	
Con 87-1	Condition 87 (heading)	Revise	Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units.	
Con 87-2	Condition 87	Revise	Remove compliance deadline and extension reference - it has passed.	
Con 87-3	Condition 87.1	Delete	Delete - Steps towards Compliances listed in this condition have been completed.	
Con 87-4	Condition 87.3.a.(i)	Revise	Updated to note pressure drop parameters are based on most recent performance tests (not the initial performance test).	
Con 89-1	Condition 89.1	Delete	The initial source test for EU IDs 20 - 23 has been conducted.	
Con 89-2	Condition 89.1a	Revise	Correct typographical error, and revise condition level to 89.1.	
Con 90	Condition 90.2	Delete	Remove condition - it is no longer a condition in the NESHAP ZZZZ rule. Refer to letter from ADEC to David Mineau dated 3/19/2017, indicating acceptance of CO source test demonstrating compliance with emission standards listed under Condition 87.2.	
Con 91	Condition 91	Delete	This condition has been completed - delete. Ongoing performance testing described under Condition 89.	
Con 93	Condition 93.1	Delete	This condition has been completed - delete.	
Con 96	Condition 96 (heading)	Revise	Include listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units.	
Con 96-1	Condition 96	Revise	The compliance due dates for this condition have passed, so no need to show the dates anymore. - Also, some of the previously "existing" units are now new (EU IDs 65A, 66A, 67A, 68A, 112, 116). EU IDs 27 & 123 have been removed from the source (EU 75 appears to have been listed in this condition in error). Therefore, the existing CI RICE are EU IDs 19, 24, 26 - 28, 31, 34, 51 - 55, 71, 113 - 115, 117, 118 and 120, and existing SI RICE are 69 and 70A.	
Con 96-2	Condition 96.1	Revise	The compliance due dates for this condition has passed. The requirement to comply with Condition 96.2 is duplicative, as this unit is listed in Condition 96.	
Con 96-3	Condition 96.2	Delete	This subcondition duplicates the language in Condition 96. Delete. Rename subconditions as indicated in the redline. The redline language contains all necessary provision and is more concise.	
Con 96-4	Condition 96.2a(ii)	Delete	(Now Condition 96.2b). Revise to match the regulation.	
Con 97-1	Condition 97	Revise	Update to reflect "existing" for emergency RICE under Subpart ZZZZ. Also, some of the "existing" units are now new (EU IDs 82, 84, 112, 116). EU ID 123 has been removed from the source.	
Con 97-2	Condition 97.1	Revise	Update to reflect "existing" for emergency RICE under Subpart ZZZZ. See explanation under Con 97-1.	

**Alt Form E3 - Title V Condition Change Request**

Permit Number: AQ0264TVPO3

(Refer to Att E3-1 Title V Permit markup for changes described below)

Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Con 97-3	Condition 97.2b	Revise	This condition only pertains to emergency engines, 40 CFR 63.6625(e)(4) pertains to non-emergency engines.	
Con 97-4	Condition 97.4d	Revise	Closing parenthesis is missing, and paragraph has incorrect citation.	
Con 98	Condition 98	Revise	Update to reflect "existing" for emergency RICE under Subpart ZZZZ. See explanation under Con 97-1.	
Con 100	Condition 100	Revise	Add citation.	
Con 102	Condition 102	Revise	Add citation.	
Con 104	Condition 104 (heading)	Revise	Including listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units.	
Con 104-1	Condition 104.1	Revise	Update to reflect that EU IDs 5 and 6 have been replaced with EU ID 5A and 6A, and the only remaining existing boilers are 1 - 4.	
Con 104-2	Condition 104.2	Delete	EU ID 5 has been removed from the source.	
Con 104-3	Condition 104.4	Revise	Now Condition 104.3 and 104-4. Broke out the condition into two conditions to better correlate with NESHAPS Subpart 6J.	
Con 104-4	Condition 104.5	Revise	Revised to better correlate with NESHAPS Subpart 6J.	
Con 104-5	Condition 104.6	Revise	Revised to better correlate with NESHAPS Subpart 6J.	
Con 105-1	Condition 105	Revise	EU ID 5 & 6 have been replaced by EU IDs 5A & 6A. Also, (in the heading heading) including listing of all individual emission units to facilitate document searching for applicable conditions for individual emission units. Also updated reference for the updated/revise 2017 CAM Plan that will be submitted as part of the Title V Permit Renewal package.	
Con 105-2	Condition 105.2c	Revise	Clarification of condition, to indicate that excursion occurs if opacity greater than 12 percent and differential pressure is less than 2 inches of water <b>OR</b> opacity greater than 12 percent and differential pressure is greater than 8 inches of water.	
Con 112	Condition 112	Revise	Revise assessable emissions per new emission calcs in Form D1.	
Con 114-1	Condition 114	Revise	Update condition to name <b>only</b> significant EUs that are <b>not</b> subject to a federal emission standard and are <b>not</b> subject to continuous emission or parametric monitoring. As of May 13, 2013 the existing CI RICE that are subject to federal emission standards are EU IDs 19, 24, 26 – 28, 31, 34, 51 – 55, 71, 113 – 115, 117, and 118; and existing SI RICE are EU IDs 60 and 70A. Therefore the remaining units that are not subject to a federal standard are 17 and 18.	
Con 114-2	Condition 114.4	Delete	The compliance date has passed, condition no longer necessary.	
Con 119	Condition 119	Revise	Delete reference to stratospheric ozone, this is not a technology-based emission standard.	

**Alt Form E3 - Title V Condition Change Request**

Permit Number: AQ0264TVP03

(Refer to Att E3-1 Title V Permit markup for changes described below)

Change Number	Current Title V Operating Permit Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
Con 137	Condition 137	Revise	Revise the due date for submitting semi-annual operating reports - due to the multiple weeks needed for the military and 354th FW command structure review and approval process prior to the installation commander's (RO) signature/certification and submittal, Eielson AFB requests an additional 30 days for submittal of the semi-annual facility operating reports.	
Table-E	Table E	Revise	Update with new emission unit specific shield listed in emission unit forms, and stationary source-specific permit shields in Form E4 (not shown in markup).	
Sec 13 - 17	Sections 13 - 17	Revise	Update with current ADEC forms if appropriate.	