

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY CONTROL MINOR PERMIT

**Minor Permit:** AQ1538MSS02                      **Preliminary Date – September 5, 2019**  
**Rescinds Permit:** AQ1538MSS01

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ1538MSS02 to the Permittee listed below.

**Permittee:**                      **Silver Bay Seafoods, LLC**  
100 Beach Front Road, False Pass, AK 99583

**Stationary Source:**        **False Pass Facility**

**Location:**                    54.86930° N, 163.40834° W

**Permit Contact:**            Corey Bailey  
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The Permittee submitted an application for Minor Permit AQ1538MSS02 under 18 AAC 50.508(6) to revise and rescind the terms and conditions of AQ1538MSS01. AQ1538MSS02 carries forward the classification of 50.502(c)(1) for a new stationary source with potential to emit greater than 40 tons per year NO<sub>x</sub>. The project is also classified under 18 AAC 50.508(5) for Owner Requested Limits (ORLs) to avoid Minor Permitting under 18 AAC 50.502(c)(1) for SO<sub>2</sub>.

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.

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James R. Plosay, Manager  
Air Permits Program

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### Abbreviations and Acronyms

AAC.....	Alaska Administrative Code	NESHAPs.....	National Emission Standards for Hazardous Air Pollutants [as contained in 40 C.F.R. 61 and 63]
ADEC .....	Alaska Department of Environmental Conservation	NOx .....	nitrogen oxides
AOS .....	Air Online Services	NRE.....	nonroad engine
AS .....	Alaska Statutes	NSPS .....	New Source Performance Standards [as contained in 40 C.F.R. 60]
ASTM.....	American Society for Testing and Materials	O & M .....	operation and maintenance
BACT .....	best available control technology	O <sub>2</sub> .....	oxygen
bhp .....	brake horsepower	PAL .....	plantwide applicability limitation
CDX.....	Central Data Exchange	PM-10.....	particulate matter less than or equal to a nominal 10 microns in diameter
CEDRI .....	Compliance and Emissions Data Reporting Interface	PM-2.5.....	particulate matter less than or equal to a nominal 2.5 microns in diameter
C.F.R. ....	Code of Federal Regulations	ppm .....	parts per million
CAA.....	Clean Air Act	ppmv, ppmvd.....	parts per million by volume on a dry basis
CO .....	carbon monoxide	psia .....	pounds per square inch (absolute)
Department .....	Alaska Department of Environmental Conservation	PSD .....	prevention of significant deterioration
dscf .....	dry standard cubic foot	PTE.....	potential to emit
EPA .....	US Environmental Protection Agency	SIC.....	Standard Industrial Classification
EU.....	emissions unit	SIP.....	State Implementation Plan
gr/dscf.....	grain per dry standard cubic foot (1 pound = 7000 grains)	SPC.....	Standard Permit Condition or Standard Operating Permit Condition
gph.....	gallons per hour	SO <sub>2</sub> .....	sulfur dioxide
HAPs .....	hazardous air pollutants [as defined in AS 46.14.990]	The Act.....	Clean Air Act
hp .....	horsepower	TPH .....	tons per hour
ID.....	emissions unit identification number	tpy.....	tons per year
kPa.....	kiloPascals	VOC .....	volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
LAER.....	lowest achievable emission rate	VOL.....	volatile organic liquid [as defined in 40 C.F.R. 60.111b, Subpart Kb]
MACT .....	maximum achievable control technology [as defined in 40 C.F.R. 63]	vol% .....	volume percent
MMBtu/hr.....	million British thermal units per hour	wt% .....	weight percent
MMSCF.....	million standard cubic feet	wt% <sub>S<sub>fuel</sub></sub> .....	weight percent of sulfur in fuel
MR&R.....	monitoring, recordkeeping, and reporting		

## Section 1 Emissions Unit Inventory

**Emissions Unit (EU) Authorization.** The Permittee is authorized to install and operate the EUs listed in Table 1 in accordance with the minor permit application and the terms and conditions of this permit. 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 Table 1.

**Table 1 – EU Inventory**

EU #	Silver Bay On-Site ID <sup>1</sup>	EU Description	Make/Model	Fuel	Rating/Max Capacity	Install Date
1	Generator No. 3	Primary Generator #1	Caterpillar C27	Diesel	800 kW	2019
2	Generator No. 4	Primary Generator #2	Caterpillar C27	Diesel	800 kW	2019
3	Generator No. 7	Primary Generator #3	Caterpillar C27	Diesel	800 kW	2019
4	Generator No. 1	Primary Generator #4	Caterpillar C7.1	Diesel	200 kW	2019
5	Generator No. 2	Primary Generator #5	Caterpillar C7.1	Diesel	200 kW	2019
6	Generator No. 5	Primary Generator #1	Caterpillar 3516C	Diesel	2,230 kW	2019
7	Generator No. 6	Primary Generator #2	Caterpillar 3516C	Diesel	2,188 kW	2019
8	N/A	Bathhouse Boiler #1	Burnham MPC-5	Diesel	0.77 MMBtu/hr	2019
9	N/A	Bathhouse Boiler #2	Burnham MPC-5	Diesel	0.77 MMBtu/hr	2019
10	N/A	Plant Boiler #1	TBD	Diesel	1.6 MMBtu/hr	2019
11	N/A	Plant Boiler #2	TBD	Diesel	1.6 MMBtu/hr	2019
12	N/A	Used Oil Heater	Energy Logic EL-200H	Oil	0.2 MMBtu/hr	2019

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.

<sup>1</sup> “Silver Bay On-Site ID” is a designation used internally by Silver Bay Seafoods, and is presented here for reference purposes only. All EUs listed in this permit are identified by the Department’s “EU #” designation.

2. **Verification of Equipment Specifications and Maintenance of Equipment.** 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 the manufacturer's or operator's maintenance procedure onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

## **Section 2      Fee Requirements**

3.    **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 – 499.
4.    **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.<sup>2</sup> 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:
  - 4.1    the stationary source’s assessable potential to emit of 143 tpy; or
  - 4.2    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.
5.    **Assessable Emission Estimates.** Emission fees will be assessed as follows:
  - 5.1    no later than March 31 of each year, the Permittee may submit an estimate of the stationary source’s assessable emissions via the Department’s AOS System at <http://dec.alaska.gov/applications/air/airtoolsweb> using the Permittee Portal option and filling out the Emission Fee Estimate form. Alternatively, the report may be submitted by:
    - a.    Email under a cover letter using [dec.aq.airreports@alaska.gov](mailto:dec.aq.airreports@alaska.gov); or
    - b.    hard copy to the following address: ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 555 Cordova Street, Anchorage, Alaska 99501.

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<sup>2</sup> If the stationary source has not commenced construction or operation on or before March 31<sup>st</sup>, submit a transmittal letter certified under 18 AAC 50.205 to the Department’s Juneau office, in accordance with Condition 5.1, that identifies the source’s assessable emissions for the previous fiscal year to be zero tons per year and provide estimates for when construction and operation will commence.

- 5.2 The Permittee shall include with the assessable emissions report all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.
- 5.3 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 4.1.
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 for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EUs 1 through 12 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.
  - 7.1 For EUs 1 through 7, verify initial compliance with Condition 7 by recording the date of initial startup, and performing one of the following, for each EU:
    - a. Obtaining a certified manufacturer guarantee, prior to the initial startup of the EUs in Condition 7.1, that the EUs will comply with the visible emission standard; or
    - b. Conducting an initial observation according to 40 C.F.R. 60, Appendix A-4, Method 9, for 18 minutes to obtain 72 consecutive 15-second opacity observations, within 60 days of initial startup of each EU.
  - 7.2 For EUs 1 through 7 monitor, record, and report as described in Conditions 7.2a through 7.2d.
    - a. When using Condition 7.1a to verify initial compliance of EUs 1 through 7, submit a copy of the guarantee obtained under Condition 7.1a to the first operating report required under Condition 19 after the initial startup of EUs 1 through 5, and 7.
    - b. When using Condition 7.1b to verify initial compliance of EUs 8 through 12, submit a copy of the observation records developed under Condition 7.1b using the form in Attachment 1, to the first operating report submitted under Condition 19 for the period that covers the 30<sup>th</sup> day after the observation was conducted.
    - c. Report as described in Condition 18 if any of the requirements under Conditions 7.1 are not met.
    - d. If the results of Method 9 observations completed under Condition 7.1b exceed the standard in Condition 7, report as excess emissions and permit deviation in accordance with Condition 18, take corrective actions, and conduct follow-up Method 9 observations until the standard in Condition 7 is met.
8. **Particulate Matter for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow particulate matter emitted from EUs 1 through 12 to exceed 0.05 grains per dry standard 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 SO<sub>2</sub>, from EUs 1 through 12, to exceed 500 parts per million (ppm) averaged over three hours.

## **Section 4 Ambient Air Quality Protection Requirements**

10. To protect the annual nitrogen dioxide (NO<sub>2</sub>) Alaska Ambient Air Quality Standards (AAAQS), the Permittee shall operate the stationary source as described below:

10.1 Construct and maintain EUs 1 through 12 as follows:

- a. For EUs 1 through 12, construct and maintain a vertical, uncapped exhaust stack for that EU. All EUs may use flapper-style rain covers, or other similar designs, that do not hinder the vertical momentum of their exhaust plume.
- b. Report in the first operating report required by Condition 19 that would be due after the installation of each EU 1 through 12, a statement that the exhaust stack for that EU complies with Condition 10.1.
- c. Report as described in Condition 18 if a requirement under Condition 10.1 is not met.

11. To protect the annual NO<sub>2</sub> AAAQS, the Permittee shall limit the NO<sub>x</sub> emissions of EUs 1 through 7 to no more than 96 tpy, combined. Monitor, record and report as follows:

11.1 Install, maintain, and operate a non-resettable fuel flow meter on each EU listed in Condition 11;

11.2 Record the fuel flow meter reading for each EU listed in Condition 11 on the last day of each month;

11.3 By the 15<sup>th</sup> day of each month, calculate and record:

- a. the amount of fuel that each EU listed in Condition 11 consumed during the previous month (if the meter is not operational assume continuous operation for that period);
- b. the total amount of NO<sub>x</sub> that each EU listed in Condition 11 emitted during the previous month, using Equation 1 and the specified emission factor for each EU listed in Table 2;
- c. the total NO<sub>x</sub> emitted by all EUs listed in Condition 11 during the previous month, by summing the values calculated under Condition 11.3b; and
- d. the amount of NO<sub>x</sub> that all EUs listed in Condition 11 emitted, in total, during the previous 12 consecutive months.

$$\text{Equation 1: } NO_x \text{ (tpy)} = \frac{(\text{hours} * EF)}{2000 \frac{lb}{ton}}$$

**Table 2 – NO<sub>x</sub> Emission Factors**

<b>EU #</b>	<b>NO<sub>x</sub> Emission Factor (lb/gal)</b>
1 through 3	0.13
4 and 5	0.11
6	0.31
7	0.37

- 11.4 Report in each operating report required by Condition 19 the following information for each month of the reporting period:
- a. the fuel flow meter reading obtained under Condition 11.2 for each EU listed in Condition 11;
  - b. the values determined under Condition 11.3a through 11.3c for each EU listed in Condition 11; and
  - c. the value determined under Condition 11.3d for all EUs listed under Condition 11 combined.
- 11.5 Report as excess emissions and permit deviation as described in Condition 18, whenever the limit in Condition 11 is exceeded, or if Conditions 11.1 through 11.4 are not met.

**Section 5 ORLs to Avoid Title V Permit Classification under 18 AAC  
50.326 for NOx**

12. The Permittee shall limit the emissions of NOx from EUs 1 through 7 to less than 96 tpy by complying with Condition 11.

**Section 6      *ORL to Avoid Title I Permit Classification Under 18 AAC 50.502(c)(1) for SO<sub>2</sub>***

13. The Permittee shall limit emissions of SO<sub>2</sub> from EUs 1 through 11 to no more than 2.8 tpy by firing only liquid fuels with a sulfur content not to exceed 15 ppmw (also known as Ultra Low Sulfur Diesel, or ULSD), in all EUs 1 through 11.
  - 13.1 Clearly label all liquid fuel tank(s) “ULSD Fuel Only”.
  - 13.2 For each delivery of liquid fuel, record the fuel sulfur grade of the fuel received, and retain a receipt from the supplier which specifies the fuel sulfur grade.
  - 13.3 Include copies of the records specified in Condition 13.2 with the operating report required by Condition 19.
  - 13.4 Report in accordance with Condition 18 whenever the fuel sulfur content exceeds the limit specified in Condition 13.

## **Section 7 Recordkeeping, Reporting, and Certification Requirements**

14. **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.
- 14.1 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 09.25.510 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 14.1a that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.
15. **Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit reports, compliance certifications, and/or other submittals required by this permit, via the Department’s AOS System at <http://dec.alaska.gov/applications/air/airtoolsweb> using the Permittee Portal option.
- 15.1 Alternatively, documents certified in accordance with Condition 14 may be submitted either by:
- a. Email under a cover letter using [dec.aq.airreports@alaska.gov](mailto: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.
16. **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.
17. **Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five-years after the date of collection, including:
- 17.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
  - 17.2 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. sampling dates and times of sampling or measurements;
- c. the operating conditions that existed at the time of sampling or measurement;
- d. the date analyses were performed;
- e. the location where samples were taken;
- f. the company or entity that performed the sampling and analyses;
- g. the analytical techniques or methods used in the analyses; and
- h. the results of the analyses.

**18. Excess Emissions and Permit Deviation Reports.**

18.1 Except as provided in Condition 21 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 commenced 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 18.1c(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 18.1c(i); and
  - (iii) for failure to monitor, as required in other applicable conditions of this permit.

18.2 When reporting either excess emissions or permit deviations, the Permittee shall report using either the Department's on-line form, which can be found at <http://dec.alaska.gov/applications/air/airtoolsweb> or <http://dec.alaska.gov/media/6687/sciv-notform-rev-9-27-10.pdf>, 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.
- 18.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.
19. **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 14.
- 19.1 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.
- 19.2 When excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 19.1, 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
- 19.1 When excess emissions or permit deviations have already been reported under Condition 18 the Permittee shall cite the date or dates of those reports.
20. **Annual Affirmation.** The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 14 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.
21. **Air Pollution Prohibited.** No person may permit 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.
- 21.1 If emissions present a potential threat to health or safety, the Permittee shall report any such emissions according to Condition 18.
- 21.2 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 21.
- 21.3 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 21 or
- b. the Department notifies the Permittee that it has found a violation of Condition 21.

21.4 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 21; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

21.5 Report in each operating report required by Condition 19 a brief summary report for complaints 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.

21.6 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 8      Standard Permit Conditions**

22. The Permittee must comply with each permit term and condition. Noncompliance 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
  - 22.1 an enforcement action; or
  - 22.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
23. 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.
24. 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.
25. 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.
26. The permit does not convey any property rights of any sort, nor any exclusive privilege.
27. 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
  - 27.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
  - 27.2 have access to and copy any records required by this permit;
  - 27.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
  - 27.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

**Section 9      *Permit Documentation***

<u>Date</u>	<u>Document Details</u>
July 18, 2019	Department provided pre-application assistance by e-mail.
July 31, 2019	Silver Bay submitted application.
August 7, 2019	Silver Bay submitted additional ORL information.
August 7, 2019	Department responded to ORL information with a proposal for limits under Conditions 11 and 12.
August 9, 2019	Silver Bay requested revisions to the emission unit inventory to make EU #s correspond to their on-site ID designations.

## **Section 10 Complaint Form**

### **COMPLAINT FORM**

Date \_\_\_\_\_ Time: \_\_\_\_\_

Activities Involved:

Provide a description of reported complaint. Attach sheets as necessary.

If applicable, operational conditions which contributed to the complaint:

If applicable, ambient conditions which contributed to the complaint:

If applicable, describe measures taken to immediately address the complaint.

If applicable, describe measures taken to address preventing the condition which generated the complaint.

If applicable, describe any reason that you feel the complaint may not be a violation:

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

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## 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.”

- 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 VE observation is being made.
- Phone (Key Contact): number for appropriate contact.
- 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 Present?: check “yes” if visible water vapor is present.
- If Present, is Plume...: check “attached” if water droplet plume forms prior to exiting stack, and “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			7					
	Start	End		8					
Describe Emissions & Color				9					
Start	End			10					
Visible Water Vapor Present? If yes, determine approximate distance from the stack exit to where the plume was read				11					
No	Yes			12					
Point in Plume at Which Opacity Was Determined				13					
Describe Plume Background			Background Color		14				
Start	Start			15					
End	End			16					
Sky Conditions: Start				17					
				18					
Wind Speed	Wind Direction From			19					
	Start	End		20					
Ambient Temperature	Wet Bulb Temp		RH percent		21				
				22					
NOTES: 1 Stack or Point Being Read 2 Wind Direction From				23					
3 Observer Location	4 Sun Location	5 North Arrow	6 Other Stacks		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

Excess Emissions and Permit Deviation Reporting  
State of Alaska Department of Environmental Conservation  
Division of Air Quality

False Pass Facility	AQ1538MSS02
Stationary Source Name	Air Quality Permit
Silver Bay Seafoods, LLC	
Company Name	Date

### When did you discover the Excess Emissions/Permit Deviation?

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : / \_\_\_\_

### When did the event/deviation?

Begin Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : \_\_\_\_ (Use 24-hr clock.)

End Date \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : \_\_\_\_ (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 conditions complete Section 2 and certify
- Deviation 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
- Scheduled Maintenance/Equipment Adjustments
- 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) Emission unit(s) Involved:**

Identify the emission units 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):

- Opacity %                       Venting (gas/scf)                       Control Equipment Down  
 Fugitive Emissions                       Emission Limit Exceeded                       Record Keeping Failure  
 Marine Vessel Opacity                       Failure to monitor/report                       Flaring  
 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)

- Emission Unit Specific
- General Source Test/Monitoring Requirements
- Recordkeeping/Reporting/Compliance Certification
- Standard Conditions Not Included in Permit
- Generally Applicable Requirements
- Reporting/Monitoring for Diesel Engines
- Insignificant Emission Unit
- Stationary Source-Wide
- Other Section: (title of section and section # of your permit)

(b) **Emission unit(s) Involved:**

Identify the emission unit involved in the event, using the same identification number and name as in the permit. List the corresponding Permit condition and the deviation.

<u>EU ID</u>	<u>Emission Unit Name</u>	<u>Permit Condition /Potential Deviation</u>

(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. Department's Air Online Services using the Permittee Portal option:

<http://dec.alaska.gov/applications/air/airtoolsweb>

*If submitted online, report must be submitted by an authorized E-Signer for the stationary source.*

Or

2. Fax to: 907-451-2187

Or

3. Email to: [DEC.AQ.Airreports@alaska.gov](mailto:DEC.AQ.Airreports@alaska.gov)

Or

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

Or

5. Phone Notifications: 907-451-5173

*Phone notifications require a written follow-up report.*