

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY CONTROL MINOR PERMIT

Minor Permit No. AQ0082MSS05

Issue Date: Preliminary – June 11, 2021

Rescinds Construction Permit 082CP04 Revision 1

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0082MSS05 to the Permittee listed below.

Permittee: Alyeska Pipeline Service Company
PO Box 196660
Anchorage, AK 99519-6660

Stationary Source: Valdez Marine Terminal

Location: 61° 5' 10" North; 146° 23' 20" West

Project: Tank Bottoms Processing (TBP) System

Permit Contact: Don Cook, 907 834-7591, donald.cook@alyeska-pipeline.com

This project is classified under 18 AAC 50.508(6) for revising or rescinding the terms and conditions of a Title I permit. The project is also classified under 18 AAC 50.508(5) for Owner Requested Limits (ORLs) to avoid a minor permit under 18 AAC 50.502(c)(3) for oxides of nitrogen (NO_x) and sulfur dioxide (SO₂), and to avoid PSD review under 18 AAC 50.306 for NO_x. Construction Permit 082CP04 Revision 1 avoided PSD review for volatile organic compounds (VOC) and SO₂ and this permit continues to avoid PSD review under 18 AAC 50.306 for VOC and SO₂.

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.

James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

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

Section 1 Emissions Unit Inventory

Emissions Unit (EU) Authorization. The Permittee is authorized to install and operate the emissions units listed in Table A in accordance with the terms and conditions of this permit and the minor permit application. Except as noted elsewhere in this permit, the information in Table A is for identification purposes only. The specific emissions unit descriptions do not restrict the Permittee from replacing an emissions unit identified in Table A.

Table A – Emissions Unit Inventory ¹

EU ID	Name	Description	Fuel	Rating/Max Capacity
18	TBP Boilers	Boilers	Propane or Diesel	18.5 MMBtu/hr
19	TBP Mixing Tank(s)	Tank bottoms mixing tank(s)	-	-
22	Solids Container(s)	Recovered solids container(s)	-	-
23	Thermal Dryer(s)	Steam-heated dryer(s)	-	-
24	Nonroad Engine(s)	VOC control device	Propane	-
81	Thermal Oxidizer(s)	VOC control device	Propane or Diesel	20.0 MMBTU/hr
82	Thermal Dryer(s)	Fuel-burning dryer(s)	Propane or Diesel	18.0 MMBTU/hr
83	Thermal Dryer(s)	Electric dryer(s)	-	-
84	Centrifuge(s)	Oil, water, and solids separator	-	-
85	Water Effluent Tank(s)	Water Effluent Tank(s)	-	-
86	Recovered Crude Tank(s)	Recovered Crude Tank(s)	-	-

Table Notes:

¹ Table only contains units for the tank bottoms processing system. Other emissions units have been installed at the stationary source and are not included in this permit action.

1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement emissions unit, including any applicable minor or construction permit requirements.

Section 2 Fees

2. **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 through 403.
3. **Assessable Emissions.** For each period from July 1 through the following June 30, the Permittee shall pay to the Department an annual emission fee based on the stationary source’s assessable emissions, as determined by the Department under 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 the stationary source’s
 - 3.1. potential to emit of 4,083 tpy; or
 - 3.2. projected annual rate of emissions, in tpy, based upon actual annual emissions for the most recent calendar year, or another 12-month period approved in writing by the Department, when demonstrated by credible evidence of actual emissions, based upon the most representative information available from 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.** The Permittee shall comply 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, as determined in Condition 3.2. Submit actual emissions estimates in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-i-submission-instructions/>.
 - 4.2. The Permittee shall include with the assessable emissions report all the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.
 - 4.3. If the stationary source has not commenced construction or operation on or before March 31st, the Permittee may submit to the Department’s Anchorage office a waiver letter certified under 18 AAC 50.205 that states the stationary source’s actual annual emissions for the previous calendar year are zero tpy and provides estimates for when construction or operation will commence.
 - 4.4. If no estimate or waiver letter 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 in Condition 3.1.

Section 3 ORLs to Avoid Permit Classifications

5. The Permittee shall limit the emissions of VOC from EU IDs 19, 22, 23, and 82 through 86 to no more than 20.9 tpy as follows to avoid a major modification and classification under 18 AAC 50.306.
 - 5.1. VOC emissions vented from each of EU IDs 19, 23, and 82 through 86 shall be collected by a vapor recovery system and controlled using any of EU IDs 24 and 81 whenever the Tank Bottoms Processing (TBP) system is in operation.
 - a. Each unit under EU ID 24 must be a propane-fired unit equipped and operated with a catalytic converter.
 - b. The TBP system is in operation whenever the temperature in any of the mix tanks (EU ID 19), centrifuges (EU ID 84), or dryers (EU IDs 23, 82, and 83) is greater than 100°F and the unit contains tank bottoms. Sources that contain no tank bottoms or are cooler than 100°F may be isolated from the vapor recovery system while the other units are in operation.
 - c. Record the time and date whenever the TBP system begins and ends operation.
 - 5.2. Within 3 days of each initial startup after the TBP system is brought onsite, validate the integrity of the TBP vapor collection system by conducting a survey of all vapor collection system piping and connections for indications of leaks using Method 21 in 40 CFR 60, Appendix A.
 - a. Repair any leaks (greater than 1,000 ppm) detected in the survey within 3 days of discovery.
 - b. Repair any other visual, audible, or olfactory indications of leaks within 3 days of discovery.
 - c. Keep records of the following:
 - (i) The dates of each initial startup of the TBP system after the system is brought onsite,
 - (ii) The dates the surveys required in Condition 5.2 are conducted, and
 - (iii) Any leaks that are detected and the dates each leak is repaired as required in Conditions 5.2.a and 5.2.b.
 - d. Include copies of the records required in Condition 5.2.c in the first operating report required in Condition 13 after each survey is conducted.
 - 5.3. Limit the combined operation of all units under EU ID 24 to no more than 3,360,000 hp-hr/yr.
 - 5.4. Limit the post-process solids output of the TBP system to no more than 12,000 bbl/yr.
 - 5.5. Keep records of:

- a. the maximum horsepower rating of each unit under EU ID 24 and the monthly and rolling 12-month hours of operation of each unit under EU ID 24; and
 - b. the monthly and rolling 12-month total volume (bbls) of solids recovered from tank bottoms processing.
- 5.6. On or before the 15th day of each month, calculate and record the monthly and rolling 12-month total hp-hr for all units under EU ID 24 for the previous month. The maximum horsepower rating and hours of operation recorded under Condition 5.5 shall be used to calculate total hp-hr.
- 5.7. Include the information recorded under Conditions 5.5 and 5.6 in each operating report required in Condition 13 for each month of the reporting period.
- 5.8. Report in accordance with Condition 12 whenever any limit in Conditions 5.3 and 5.4 is exceeded.
6. The Permittee shall limit the total combined emissions of NO_x from EU IDs 18, 81, and 82 to less than 16 tpy and the total combined emissions of SO₂ from EU IDs 18, 81, and 82 to less than 17 tpy to avoid classification under 18 AAC 50.502(c)(3) as follows:
 - 6.1. Limit the combined maximum design heat input capacity of EU ID 18 to 18.5 MMBTU/hr or less, and the individual boiler maximum design heat input capacity to less than 10 MMBTU/hr.
 - 6.2. Limit the combined maximum design heat input capacity of EU ID 81 to 20 MMBTU/hr or less.
 - 6.3. Limit the combined maximum design heat input capacity of EU ID 82 to 18 MMBTU/hr or less.
 - 6.4. Prior to each initial startup after the TBP system is brought onsite, verify and record the maximum design heat input capacity of each of EU IDs 18, 81, and 82.
 - 6.5. Burn only fuel with a sulfur content of 0.2 percent by weight or less in EU IDs 18, 81, and 82.
 - a. The Permittee shall obtain and keep receipts from fuel suppliers that confirm that all fuel for EU IDs 18, 81, and 82 meets the specifications of Condition 6.5.
 - b. Include copies of the records required in Condition 6.5.a in each operating report required in Condition 13.
 - c. Report in accordance with Condition 12 if any fuel combusted in EU IDs 18, 81, and 82 exceeds the fuel sulfur content limit in Condition 6.5 or if any of the requirements of Conditions 6.5.a and 6.5.b are not met.
 - 6.6. Limit each of EU IDs 18, 81, and 82 to no greater than 2,800 hours of operation per consecutive 12-month period.
 - a. Maintain a log for operating hour records for each emissions unit listed in Condition 6.6;

- b. By the 15th day of each month, calculate and record:
 - (i) the number of hours that each emissions unit listed in Condition 6.6 operated during the previous calendar month, if there are missing records or data for a period, assume continuous operation for that period; and
 - (ii) the total number of hours each emissions unit listed in Condition 6.6 operated during the previous 12 consecutive months;
 - c. Include the values determined under Condition 6.6.b in each operating report required in Condition 13 for each month of the reporting period.
 - d. Report in accordance with Condition 12 whenever the limit in Condition 6.6 is exceeded, or if any of the requirements of Conditions 6.6.a through 6.6.c are not met.
7. The Permittee shall limit the per-tank maximum design capacity of each of EU IDs 85 and 86 to less than 19,812 gallons to avoid applicability of the requirements of 40 CFR 60 Subpart Kb.
- 7.1. Prior to each initial startup after the TBP system is brought onsite, verify and record the maximum capacity of each of EU IDs 85 and 86.

Section 4 Recordkeeping, Reporting, and Certification Requirements

- 8. 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.
- 8.1. The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if the person providing the electronic signature
- uses a security procedure, as defined in AS 09.80.190, that the Department has approved; and
 - accepts or agrees to be bound by an electronic record executed or adopted with that signature.
- 9. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit to the Department one certified copy of reports, compliance certifications, and/or other submittals required by this permit. The Permittee may submit the documents electronically or by hard copy.
- 9.1. Submit the certified copy of reports, compliance certifications, and/or other submittals in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/>.
- 10. 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.
- 11. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five-years after the date of collection, including:
- copies of all reports and certifications submitted pursuant to this section of the permit; and
 - records of all monitoring required by this permit, and information about the monitoring including (if applicable):
 - calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
 - the date, place, and time of sampling or measurements;
 - the operating conditions that existed at the time of sampling or measurement;

- d. the date 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.

12. Excess Emissions and Permit Deviation Reports. The Permittee shall report excess emissions and permit deviations as follows:

12.1. Excess Emissions Reporting. Except as provided in Condition 14, the Permittee shall report all emissions or operations that exceed emissions standards or limits of this permit, as follows:

- a. In accordance with 18 AAC 50.240(c), as soon as possible, report
 - (i) excess 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 causes emissions in excess of a technology-based emissions standard.
- c. If a continuous or recurring excess emissions is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 12.1.d.
- d. Report all other excess emissions not described in Conditions 12.1.a, 12.1.b, and 12.1.c within 30 days after the end of the month during which the excess emissions occurred or as part of the next routine operating report in Condition 13 for excess emissions that occurred during the period covered by the report, whichever is sooner.
- e. If requested by the Department, the Permittee shall provide a more detailed written report to follow up on an excess emissions report.

12.2. Permit Deviations Reporting. For permit deviations that are not “excess emissions,” as defined under 18 AAC 50.990:

- a. Report according to the required deadline for failure to monitor, as specified in other applicable conditions of this permit.
- b. Report all other permit deviations within 30 days after the end of the month during which the deviation occurred or as part of the next routine operating report in Condition 13 for permit deviations that occurred during the period covered by the report, whichever is sooner.

- 12.3. **Notification Form.** 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 the Division of Air Quality’s Air Online Services (AOS) system webpage Permittee Portal option, <http://dec.alaska.gov/applications/air/airtoolsweb>, or, if the Permittee prefers, the form contained in Attachment 2 to this permit. The Permittee must provide all information called for by the form that is used. Submit the report in accordance with the submission instructions on the Department’s Standard Permit Conditions webpage found at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.
- 13. Operating Reports.** The Permittee shall submit to the Department an operating report in accordance with Conditions 8 and 9 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.
- 13.1. 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.
- 13.2. When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 13.1, the Permittee shall identify
- a. the date of the excess emissions or permit 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(s) of such actions;
or
- 13.3. When excess emissions or permit deviation reports have already been submitted under Condition 12 during the period covered by the operating report, the Permittee shall either
- a. include a copy of those excess emissions or permit deviation reports with the operating report; or
 - b. cite the date(s) of those reports.
- 14. 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.
- 14.1. **Monitoring.** The Permittee shall monitor as follows:
- a. 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 14.
 - b. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if

- (i) after an 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 14; or
- (ii) the Department notifies the Permittee that it has found a violation of Condition 14.

14.2. **Recordkeeping.** 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 14; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

14.3. **Reporting.** The Permittee shall report as follows:

- a. With each operating report under Condition 13, the Permittee shall include a brief summary report which must include the following for the period covered by the report:
 - (i) the number of complaints received;
 - (ii) the number of times the Permittee or the Department found corrective action necessary;
 - (iii) the number of times action was taken on a complaint within 24 hours; and
 - (iv) the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.
- b. 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.
- c. If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 12.

Section 5 Standard Permit Conditions

- 15.** 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
 - 15.1. an enforcement action; or
 - 15.2. permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
- 16.** 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.
- 17.** 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.
- 18.** 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.
- 19.** The permit does not convey any property rights of any sort, nor any exclusive privilege.
- 20.** 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
 - 20.1. enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 20.2. have access to and copy any records required by this permit;
 - 20.3. inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 20.4. sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 6 General Source Test Requirements

21. **Requested Source Tests.** In addition to any source testing explicitly required by this permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.
22. **Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
 - 22.1. at a point or points that characterize the actual discharge into the ambient air; and
 - 22.2. 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.
23. **Reference Test Methods.** The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:
 - 23.1. Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in 40 CFR 60, Appendix A, Reference Method 9.
 - 23.2. Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals and acid gases must be conducted in accordance with the methods and procedures specified in 40 CFR 60, Appendix A.
 - 23.3. Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 CFR 51, Appendix M, Methods 201 or 201A and 202.
 - 23.4. Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 CFR 63 Appendix A, Method 301.
24. **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.
25. **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.
26. **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.

- 27. Test Reports.** Within 60 days after completing a source test, the Permittee shall submit one certified copy 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 8. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.
- 28. Test Exemption.** The Permittee is not required to comply with Conditions 25, 26 and 27 when the exhaust is observed for visible emissions by Method 9 Plan or Smoke/No Smoke Plan.

Section 7 Permit Documentation

<u>Date</u>	<u>Document Details</u>
October 8, 2019	Application received.
March 27, 2020	Response received from Alyeska Pipeline Services Company regarding questions and comments from the Department concerning the application.
April 15, 2020	Application amendment received.
March 31, 2021	Application amendment received.

Attachment 1 – 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 2 – Notification Form

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

_____	_____
Stationary Source Name	Air Quality Permit No.
_____	_____
Company Name	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

Note: All “excess emissions” are also “permit deviations.” However, use only Section 1 for events that involve excess emissions.

Deviation from Permit Condition – Complete Section 2 and Certify

Note: Use only Section 2 for permit deviations that do not involve excess emissions.

Deviations from COBC¹, CO², or Settlement Agreement – Complete Section 2 and Certify

¹ Compliance Order By Consent

² Compliance Order

Section 1. Excess Emissions

(a) **Was the exceedance** Intermittent or Continuous

(b) **Cause of Event** (Check one that applies. Complete a separate form for each event, as applicable.):

- 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. Attach supporting information if necessary.

(d) **Emissions Units Involved:**

Identify the emissions 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):

- Opacity _____ % Venting _____ gas/scf Control Equipment Down
 Fugitive Emissions Emission Limit Exceeded Marine Vessel Opacity
 Flaring Other _____

(f) **Corrective Actions:**

Describe actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence. Attach supporting information if necessary.

(g) **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 all boxes that apply per event. Complete a separate form for each event, as applicable.)

- Emissions Unit-Specific Requirements
- Stationary Source-Wide Specific Requirements
- Monitoring/Recordkeeping/Reporting Requirements
- General Source Test Requirements
- Compliance Certification Requirements
- Standard/Generally Applicable Requirements
- Insignificant Emissions Unit Requirements
- Other: _____

(b) **Emissions Units Involved:**

Identify the emissions 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. Attach supporting information if necessary.

(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). Read and sign the certification in the bottom of the form above. (See Condition 8)*

Submit this report in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at

<http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.

If submitted online, report must be submitted by an authorized E-signer for the stationary source (according to Condition 8).