DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR QUALITY CONTROL MINOR PERMIT

Minor Permit No. AQ0325MSS02, Revision 3 Rescinds Minor Permit AQ0325MSS02, Revision 2 Preliminary Date: May 13, 2022

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0325MSS02 Revision 3 to the Permittee listed below.

Permittee:	US Ecology Alaska, LLC 619 East Ship Creek Avenue, Suite 309 Anchorage, Alaska 99501
Stationary Source:	Moose Creek Facility
Location:	64°24'50"North; 147°08'17"West
Project:	Remediation of PFAS-Contaminated Materials
Permit Contact:	M. Blake Hillis, Senior Vice President (907) 258-1558

The Permittee submitted an application for Air Quality Control Minor Permit AQ0325MSS02 Revision 3 under 18 AAC 50.508(6) to revise and rescind the terms and conditions of Minor Permit AQ0325MSS02 Revision 2.

The permit carries forward the classification of 18 AAC 50.508(5) to establish owner requested limits (ORLs). The ORLs allow the Permittee to avoid classification as a major source of hazardous air pollutants (HAPs) for the emissions of hydrogen fluoride (HF) and the need to obtain an Air Quality Control Title V Operating Permit issued under 18 AAC 50.326.

Air Quality Control Minor Permit AQ0325MSS02 Revision 3 satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. The Permittee shall comply with the terms and conditions of this permit as required by AS 46.14.120(c).

James R. Plosay, Manager Air Permits Program

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Section 1 Emissions Unit Inventory

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

EU	EU Description	Make/Model	Fuel	Rating/Max Capacity	Installation Date
Rotary Kiln		Aqua Guard Technologies, Inc. Thermal Oxidizer Mark III Rotary Kiln (Serial # AG 91-MK III/4)	n/a	30 tph	1991
	Kiln Burner Maxon Multi-fire Kiln Burner		liquid	15 MMBtu/hr	1991
	Secondary Burner	Maxon Kinemak Secondary Burner	liquid	8 MMBtu/hr	1991
1 Bagho Wet Scr	Baghouses	Hosokawa Micron Mikro-Pulsaire Dust Collector Baghouses (2 ea.)	n/a	9'9"x10'4" 480 bags	1991
	Wet Scrubber	Bionomic Industries Series 5000 Model 136 Counter-Current Packed Tower Absorber	n/a	12,800 acfm maximum flow rate, 6 feet of packing, 130 gpm recirculating scrubbing solution, 3 gpm of makeup water, 2 gpm bleed rate, 1 gpm evaporation rate	TBD

Table 1. Authorized EU Inventory

Table Notes:

'tph' has the meaning tons-per-hour and 'MMBtu/hr' million British thermal units per-hour.

Section 2 ORLs to Avoid Permit Classifications

- 1. **Hydrogen Fluoride (HF) Emissions Limit.** The Permittee shall limit the emissions of HF from EU 1 to no greater than 9.9 tons in any 12 consecutive month period to avoid classification as a major source of HAPs and the need to obtain an Air Quality Control Title V Operating Permit issued under 18 AAC 50.326 as follows:
 - 1.1 The Permittee may collect and remediate soils contaminated with per- and polyfluoroalkyl substances (PFAS):
 - a. as long as such soils are not classified as hazardous waste under 40 C.F.R. 261.4(b) and 18 AAC 62; and
 - b. in comport with the provisions of the Permittee's most recent Thermal Operations Plan approved by the Department's Contaminated Sites Program.
 - 1.2 The Permittee shall not remediate contaminated soils that may contain compounds that emit HF as a product of thermal combustion such as PFAS at the stationary source until:
 - a. an operable wet scrubber emissions control device (wet scrubber) has been installed to continuously scrub acidic gases from the rotary kiln and secondary burner of EU 1 while treating PFAS contaminated soil;
 - b. vendor- and/or manufacturer-provided parametric operating data, including a guaranteed minimum level of specified control, for a wet scrubber has been approved by the Department in writing; and
 - c. a source test plan to measure contaminated soils that may contain compounds that emit HF as a product of thermal combustion such as PFAS from EU 1 has been submitted to the Department for approval in accordance with Section 5. Following the requirements of Condition 23 below, the source test plan will include the methods and procedures to be used for sampling, testing, and quality assurance for determining concentrations and emission rates of particulate matter, HF, organic and inorganic fluorine (F), and PFAS from EU 1. Permittee will use U.S. EPA Reference Methods 1, 2, 3A, 5, 6C, 17, 26A, 202, 320, and ASTM D6348 (as applicable). Permittee will perform Method 26A and 5 simultaneously. The source test plan will also identify the EPA Methods that will be used to identify individual PFAS compounds.
 - 1.3 The Permittee shall conduct a source test during operation of the wet scrubber, in accordance with a source test plan approved by the Department under Condition 1.2c and Section 5, within 14 operating days of processing PFAS-contaminated soil at EU ID 1 in each calendar year.
 - 1.4 The Permittee shall not collect or remediate any soils for which lab analyses have not been conducted and approved by the Department in writing to determine average and representative concentrations of PFAS in such soils.
 - 1.5 The Permittee shall operate and maintain the wet scrubber according to manufacturer specifications at all times that thermal remediation of PFAS contaminated soil occurs.

- 2. **HF Emissions Limit Monitoring.** The Permittee shall monitor the operating conditions for a wet scrubber as follows:
 - 2.1 on a continuous basis during each day PFAS contaminated soil is processed, monitor operating times noting any times and circumstances when the wet scrubber is for any reason, bypassed;
 - 2.2 on a continuous basis during each day PFAS contaminated soil is processed, monitor pressure differential and liquid flow rate;
 - 2.3 according to a monitoring schedule recommended by the vendor/manufacturer, monitor the chemical and operating parameters necessary to ensure the scrubber liquid is maintained to control HF emissions as determined through source testing and as described by Condition 1; and
 - 2.4 on a daily basis, monitor the gross mass of PFAS-contaminated soil processed at the stationary source via third-party certification of soil delivered for remediation.
- 3. **HF Emissions Limit Recordkeeping.** For a period of at least five years, the Permittee shall keep records of the following:
 - 3.1 installation date of the wet scrubber;
 - 3.2 source test plans for a wet scrubber, required by Condition 1.2c;
 - 3.3 source test results for the wet scrubber, required by Condition 1.3; and
 - 3.4 operating conditions and parameters monitored under Condition 2, including the gross mass of PFAS-contaminated soil processed each day and third party certification of tested material. In regard to Condition 2.2, however, record minimum, maximum and average values during each operating day.
- 4. **HF Emissions Limit Reporting.** The Permittee shall report
 - 4.1 in each operating report required by Condition 10, the information recorded under Condition 3.4; and
 - 4.2 as excess emissions or permit deviation under Condition 9, anytime the HF limit in Condition 1 is exceeded or if any of Conditions 1 through 4 are not met.

Section 3 Record keeping, Reporting, and Certification Requirements

- 5. **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.
 - 5.1 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 5.1a that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.
- 6. **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.
 - 6.1 Alternatively, documents certified in accordance with Condition 5 may be submitted either by:
 - a. Email under a cover letter using <u>dec.aq.airreports@alaska.gov;</u> or
 - b. Certified mail to the following address: *ADEC Air Permits Program, ATTN: Compliance Technician, 610 University Ave., Fairbanks, AK 99709-3643.*
- 7. **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.
- 8. **Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five-years after the date of collection, including:
 - 8.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
 - 8.2 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.

9. Excess Emissions and Permit Deviation Reports.

- 9.1 Except as provided in Condition 12 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 9.1c(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 9.1c(i); and
 - (iii) for failure to monitor, as required in other applicable conditions of this permit.
- 9.2 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 <u>http://dec.alaska.gov/applications/air/airtoolsweb</u>, or if the Permittee prefers, the form contained in Attachment 1 of this permit. The Permittee must provide all information called for by the form that is used.
- 9.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.
- 10. **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 5.

- 10.1 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.
- 10.2 When excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 10.1, 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
- 10.3 When excess emissions or permit deviations have already been reported under Condition 9 the Permittee shall cite the date or dates of those reports.
- 11. **Annual Affirmation.** The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 5 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.
- 12. **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.
 - 12.1 If emissions present a potential threat to health or safety, the Permittee shall report any such emissions according to Condition 9.
 - 12.2 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 12.
 - 12.3 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 12 or
 - b. the Department notifies the Permittee that it has found a violation of Condition 12.
 - 12.4 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 12; and

- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.
- 12.5 Report in each operating report required by Condition10 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.
- 12.6 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 4 Standard Permit Conditions

- Grounds for Action. 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
 - 13.1 an enforcement action; or
 - 13.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
- 14. **Non-Defense of Enforcement Action.** 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.
- 15. **Independence of Permit Terms.** 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.
- 16. **Changes in Permit.** 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 non-compliance does not stay any permit condition.
- 17. **Property Rights.** The permit does not convey any property rights of any sort, nor any exclusive privilege.
- 18. Access. 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
 - 18.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 18.2 have access to and copy any records required by this permit;
 - 18.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 18.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements

Section 5 General Source Test Requirements

- 19. **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.
- 20. **Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
 - 20.1 at a point or points that characterize the actual discharge into the ambient air; and
 - 20.2 at the maximum rated burning or operating capacity of the emissions unit or another rate determined by the Department to characterize the actual discharge into the ambient air.
- 21. **Reference Test Methods.** The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:
 - 21.1 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 C.F.R. 60, Appendix A.
 - 21.2 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.
- 22. **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.
- 23. **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 plan within 60 days after receiving a request under Condition 19 and 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.
- 24. **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.
- 25. **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 in the manner set out in Condition 5. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.

Section 6 Permit Documentation

Date	Document Details
March 31, 2016	OIT conducted a teleconference to inform the affected parties and discuss the possible potential regulatory and health/welfare concerns over OIT's PFAS-contaminated well water being used as quench water. In Attendants were representatives from ADEC Air Quality, ADEC SPAR, Air Force legal counsel, Corp of Engineers Northern Office, and Eielson Air Force Base.
October 26, 2017	OIT submits to the Department a PFC Pilot Test Burn Work Plan to verify whether OIT can treat PFC contaminated soils to achieve Department's soil cleanup levels using existing equipment and processes and to determine if OIT can cost efficiently treat PFC soils by running different volumes (feed rate) using a constant temperature.
November 3, 2017	The Department is made aware of PFAS-contaminated soil spill at Eielson AFB delivered to Moose Creek Facility.
November 6, 2017	The Department conditionally approved OIT's October 26 PFC Pilot Test Work Plan applicable only to 84 tons of contaminated material received from Eielson Air Force Base. In its letter, the Department also indicates that the proposed test plan lacks sufficient information on the health risks associated with the potential air pollution that may result from burning the PFAS in the contaminated soil, and that for longer term site remediation clean-up planning, the responsible party(ies) should examine all treatment waste stream vectors, including soil remediation unit exhaust for environmental and human health risks. The test plan has insufficient support for site remediation.
January 23, 2018	OIT submitted its PFC Test Burn Report following the PFC Pilot Test conducted between November 6 and 9, 2017. The Test Burn Report provided positive indication that the thermal treatment effectively reduced PFC concentrations in the soil to below State regulatory required cleanup levels. The Test Burn Report, however, did not provide an evaluation of treatment waste stream vectors, including soil remediation unit exhaust for environmental and human health risks.
February 21, 2018	The Department provided OIT comments and questions to the PFC Pilot Test Report submitted January 23, 2018. In its letter, the Department also pointed out that the January 2017 PFC Pilot Test Burn Report does not contain the requested risk assessment, and that before OIT can begin accepting and treating PFAS contaminated soil, OIT must demonstrate that thermal treatment of PFAS contaminated soil will not result in air pollution prohibited under 18 AAC 50.110 and/ or the production of toxic or acidic gases or particulate matter as prohibited under 18 AAC 50.065(c).
April 12, 2018	Alaska Resources & Environmental Services submits on behalf of OIT: a)

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	OIT Test Burn Final Report Revised April 12, 2018; and b) PFC Pilot Test Project Work Plan dated April 11, 2018 for a new pilot test.
May 3, 2018	The Department provided comments to OIT on the proposed work plan, intended in part, to verify that that treatment of PFC contaminated soils will not result in air pollution prohibited under 18 AAC 50.110 and/ or the production of toxic acidic gases or particulate matter as prohibited under 18 AAC 50.065(c).
	As part of the comments, the Department requested more complete source halide testing, and requested that the air emissions final test report should contain an assessment of how the air pollution created from the combustion of PFCs is in compliance with 18 AAC 50.110 and/ or the production of toxic acidic gases or particulate matter as prohibited under 18 AAC 50.065(c).
May 9 to 12, 2018	The PFAS destruction analysis source test was completed at the Facility. The results of this test were detailed in a final report submitted to ADEC Air Quality on August 2, 2018.
July 31, 2018	OIT submitted its "PFAS Pilot Test Burn Trial 2 Report", dated July 31, 2018. The test burn was completed during the summer of 2018 with the main objective of characterizing air emissions from the thermal treatment of PFAS contaminated soil.
September 17, 2018	The Department submitted a response to OIT concerning the July 31 test burn trial 2 report, acknowledging that the thermal destruction of PFAS contaminated soil results in the emission of hydrofluoric acid (HF) and other unidentified fluorine compounds pointing out that the incineration of halogenated organic compounds, cyanic compounds, or polyurethane products in a way that gives off toxic or acidic gases or particulate matter is in violation of 18 AAC 50.065(c);
	Based on these results, ADEC requested that OIT evaluates options for controlling acid and toxic gases proceeding from the incineration of PFAS contaminated soil.
September 30, 2018	OIT submitted a letter indicating that OIT had begun working with pollution control manufacturers to design a scrubbing system to treat air emissions from OIT while processing PFAS contaminated soil. In this same correspondence, OIT requested approval to conduct a third test to treat 800-1000 tons of soil to determine maximum production rates.
October 9, 2018	OIT submits letter to Department staff regarding emissions control technology plan for proposed thermal remediation of PFAS-contaminated soil at Moose Creek Facility.
October 22, 2018	ADEC approves the thermal treatment of no more than 1,000 tons of petroleum oil and lubricants (POL) and PFAS contaminated soil to for the purpose of conducting the third and final phase of testing to demonstrate

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	actual production rates using what would be considered normal levels of PFAS in soil to determine cost effectiveness for different Alaskan PFAS affected entities.
October 26, 2018	Air Quality Permitting staff made aware of potential regulatory and health/welfare concerns from OIT-proposed thermal remediation of PFAS-contaminated soil at Moose Creek Facility.
December 12, 2018	OIT submits letter to Department staff regarding concurrence in permitting requirements for proposed thermal remediation of PFAS- contaminated soil at Moose Creek Facility.
December 20, 2018	Representative Tammy Wilson contacts Department Management on behalf of OIT regarding proposed thermal remediation of PFAS- contaminated soil at Moose Creek Facility.
December 21, 2018	The Department sends a letter to OIT indicating its concerns regarding PFAS being emitted into ambient air during the treatment process. The letter includes a permit applicablity determination for the facility and described its understanding of OIT's intent to install a wet scrubber on the soil remediation unit to avoid the source becoming classified as a major source of Hazardous Air Pollutants.
December 21, 2018	OIT submits <i>Stationary Source Identification Form</i> , Sections 1 through 16, to the Department by e-mail as an application for a minor permit.
January 7, 2019	Department provides 30-day public notice of preliminary decision to issue Minor Permit AQ0325MSS02 and opportunity for public comment in accordance with AS 46.14.140(a)(4)(D) and 18 AAC 50.542(d)(1).
February 6, 2019	End of 30-day notice of preliminary decision to issue Minor Permit AQ0325MSS01. 22 comments were recived from OIT.
March 12, 2019	Department issues Minor Permit AQ0325MSS02 to OIT in accordance with AS 46.14.170(d) and 18 AAC 50.542(f)(8).
April 26, 2019	Department issues Minor Permit AQ0325MSS02 Revision 1 identifying transfer of ownership of the Moose Creek Facility from OIT, Inc to NRC Alaska, LLC.
December 15, 2021	Department issues Minor Permit AQ0325MSS02 Revision 2 identifying Permittee name change from NRC Alaska, LLC to U.S. Ecology Alaska, LLC.
April 20, 2022	Permittee submits application for Minor Permit AQ0325MSS02 Revision 3 requesting revision to source testing timeframe under Condition 1.3.

Section 7 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. ADEC Notification Form

	Excess I	Emissions and Permit I	Deviation H	Reporting	
	State of Alas	ka Department of Envi	ironmental	Conservation	
		Division of Air Q	Juality		
Moose Creek F	acility			AQ0325MSS02	2 Rev. 3
Stationary Sour	ce Name		_	Air Quality Per	mit
US Ecology Ala	aska, LLC				
Company Name	<u>,</u>		_	Date	
When did you	discover the Ex	cess Emissions/Perm	it Deviatio	on?	
Date:	/ /			Time:	:/
When did the	event/deviation	?		-	
Begin Date:	/ /	Time	: :	(U	se 24-hr clock.)
End Date	/ /	Time	: :	(U	se 24-hr clock.)
What was the	duration of the	event/deviation?	:	(hrs:min) or	days
(total # of hrs, mir	n, or days, if intermi	ittent then include only the	duration of t	he actual emission	s/deviation)
Reason for not	tification: (pleas	e check only 1 box and	d go to the	corresponding	section)
Excess Emis	ssions Complete	Section 1 and Certify			
Deviation fro	om permit condi	tions complete Section	and cert	ify	
Deviation fro	om COBC, CO,	or Settlement Agreeme	ent Comple	ete Section 2 an	d certify
		Section 1. Excess E	missions		
(a) Was the ex	ceedance	Intermittent	or	Continuo	us
(b) Cause of E	vent (Check on	e that applies):			
Start Up/Shu	ıt Down	Natural Cause	e (weather/	earthquake/floo	od)
Control Equ	ipment Failure	Scheduled Maintenance/Equipment Adjustments			
Bad fuel/coa	ıl/gas	Upset Conditi	on	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 <u>as in the permit</u>. List the corresponding Permit condition and the deviation.

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

(c) Description of Potential Deviation:

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

(d) Corrective Actions:

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

Certification:

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

Printed Name:	Title:	Date:		
Signature:	Phone Number:			
NOTE: This document must be certified in accordance with 18 AAC 50.345(j)				
	To submit this report :			
1. Department's Air Onl	ine Services using the Permittee Portal opt	ion:		
http://dec.alaska.gov/a	applications/air/airtoolsweb			
If submitted online, re	port must be submitted by an authorized E	S-Signer for the stationary source.		
Or				
2. Fax to: 907-451-2187	7			
Or				
3. Email to: <u>DEC.AQ.A</u>	irreports@alaska.gov			
Or				
4. Mail to: ADEC				
Air C	ompliance Program			
610 U	University Avenue			
Fairb	anks, AK 99709-3643			
Or				
5. Phone Notifications: 9	007-451-5173			
Phone notifications re	equire a written follow-up report.			