



**CORDOVA
ELECTRIC
COOPERATIVE, INC**

P.O. Box 20, 700 New England Cannery Rd, Cordova, Alaska 99574
(907) 424-5555 * Fax (907) 424-5527

June 11, 2024

Alaska Department of Environmental Conservation
Air Permit Program
555 Cordova Street
Anchorage, AK 99501

Attn: Title V Program

Re: Cordova Electric Cooperative, Orca Power Plant—Application for Renewal of Operating Permit
AQ0221TVP04, Rev. 1

To Whom It May Concern:

Cordova Electric Cooperative submits this application for an Air Quality Control (AQC) Operating Permit for the Orca Power Plant. The stationary source currently operates under Permit AQ0221TVP04, Rev.1 which expires on December 12, 2024. As required by 18 AAC 50.326 an application must be submitted no sooner than June 12, 2023, and no later than June 12, 2024.

Pursuant to AS 46.14.150, and 18 AAC 50.326, this application is timely. The City of Cordova understands that completeness will be evaluated by the Alaska Department of Environmental Conservation (ADEC) according to the processes and elements established under 40 CFR 71.

This application uses ADEC's Title V forms, including a combination of revised forms and un-edited forms originating from the previous application. New requirements pertaining to EU IDs 3a and 4a are provided in each engine's respective form. Some meaningful changes are emphasized by yellow highlights for the Department's ease of review. Calculations are included in an MS Excel file.

Along with this renewal application, CEC is also submitting a minor permit application with a request for integrated review. Please refer to the minor permit application for additional details.

Consistent with 18 AAC 50.400(a)(6), CEC understands that we will continue to pay an annual permit administrative fee and that no other fees are required with this submittal.

Sincerely,

Clay Koplín
Chief Executive Officer

Attachment: Orca Power Plant Operating Permit Application

cc: EPA Region 10

Cordova Electric Cooperative
Orca Power Plant
Title V Renewal Application
AQ0221TVP04, Rev. 1



June 2024

Prepared by:



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Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form A1 – Stationary Source General Information

FORM A1
Stationary Source (General Information)

GENERAL INFORMATION			
1. Permittee:			
Permittee Name: Cordova Electric Cooperative			
Mailing Address Line 1: PO Box 20			
Mailing Address Line 2			
City: Cordova	State: AK	Zip Code: 99574	
2. Stationary Source Name: Orca Power Plant			
3. Stationary Source Physical Address: Latitude 60° 33.3' North, Longitude 145° 45.2' West			
Physical Address Line 1: 103 Orca Road			
Physical Address Line 2			
City: Cordova	State: AK	Zip Code: 99574	
4. Location:	Latitude: Latitude 60° 33.3' North	Longitude: Longitude 145° 45.2' West	
5. Primary SIC Code: 4911	SIC Code Description: Electrical Services	Primary NAICS Code: 221112	
6. Current/Previous Title V Air Permit No.: AQ0221TVP04, Rev. 1		Expiration Date: December 12, 2024	
7. Does this application contain confidential data? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
8. APPLICATION IS BEING MADE FOR:			
<input type="checkbox"/> Initial Title V Permit for this Stationary Source <input type="checkbox"/> Modify Title V Permit (currently permitted) <input checked="" type="checkbox"/> Title V Permit Renewal			
9. CONTACT INFORMATION (Attach additional sheets if needed)			
Owner:		Operator:	
Name/Title: Same as Above		Name/Title: Same as Above	
Mailing Address Line 1:		Mailing Address Line 1:	
Mailing Address Line 2		Mailing Address Line 2	
City:	State:	Zip Code:	City: State: Zip Code:
Permittee's Responsible Official:		Designated Agent:	
Name/Title: Clay Koplin, Chief Executive Officer		Name/Title: Roger Kempel, c/o Kempel, Huffman, & Ellis, P.C.	
Mailing Address Line 1: Same As Above		Mailing Address Line 1: 225 E. Fireweed Lane, Suite 200	
Mailing Address Line 2		Mailing Address Line 2	
City:	State:	Zip Code:	City: Anchorage State: AK Zip Code: 99503
Stationary Source and Building Contact:		Fee Contact:	
Name/Title: Russell Goss, Manager of Generation and Distribution		Name/Title: Emma Merritt, Manager of Administration and Finance	
Mailing Address Line 1: Same as above		Mailing Address Line 1: Same as above	
Mailing Address Line 2		Mailing Address Line 2	
City:	State:	Zip Code:	City: State: Zip Code:
Phone: 907-424-5044	Email: rgoss@cordovaelectric.com	Phone: (907) 424-5555	Email: emerritt@cordovaelectric.com
Permit Contact:		Person or Firm that Prepared Application:	
Name/Title: Russell Goss, Manager of Generation and Distribution		Name/Title: HMH Consulting, LLC	
Mailing Address Line 1: Same as Above		Mailing Address Line 1: 200 W. 34 th Avenue	
Mailing Address Line 2		Mailing Address Line 2 PMB 253	
City:	State:	Zip Code:	City: Anchorage State: AK Zip Code: 99503
Phone: 907-424-5044	Email: rgoss@cordovaelectric.com	Phone: (832)-374-7319	Email: andrea@hnhconsulting.org
10. STATEMENT OF 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.			
Name of Responsible Official (typed): Clay Koplin		Title: Chief Executive Officer	
X Signature (blue ink): 		Date: 6/11/24	

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form A2 - Stationary Source Description

FORM A2
Stationary Source Description

Permit Number: AQ0221TVP04,
Rev. 1

1.	<p>Stationary Source Description (a thorough description of the stationary source, its processes, raw materials, operating scenarios, and other specific information that may be necessary to determine the applicability of Title V requirements.) The information may include property area or map, number of employees, maximum capacity, and other primary emission-generating activities co-located or on adjacent properties.</p> <p>Orca Power Plant is a diesel electric power utility that consists of five engines. In addition, insignificant emission units include two diesel fuel storage tanks and a lube oil tank. The facility combusts diesel fuel in reciprocating internal combustion engines to produce electricity.</p>	
2.	Nonattainment area [yes/no; if yes, specify]	No
3.	Does the CAM rule [40 CFR Part 64] apply to any of the emissions units? [if yes, review the guidance provided for CAM in the Form A2 instructions for this item]	No
4.	Does the accidental release prevention regulation [40 CFR Part 68] apply to the facility? [if yes, provide the appropriate regulatory applicability document in detail.]	No

5. Attach plot plan.
6. Attach regional map.
7. Attach USGS map.

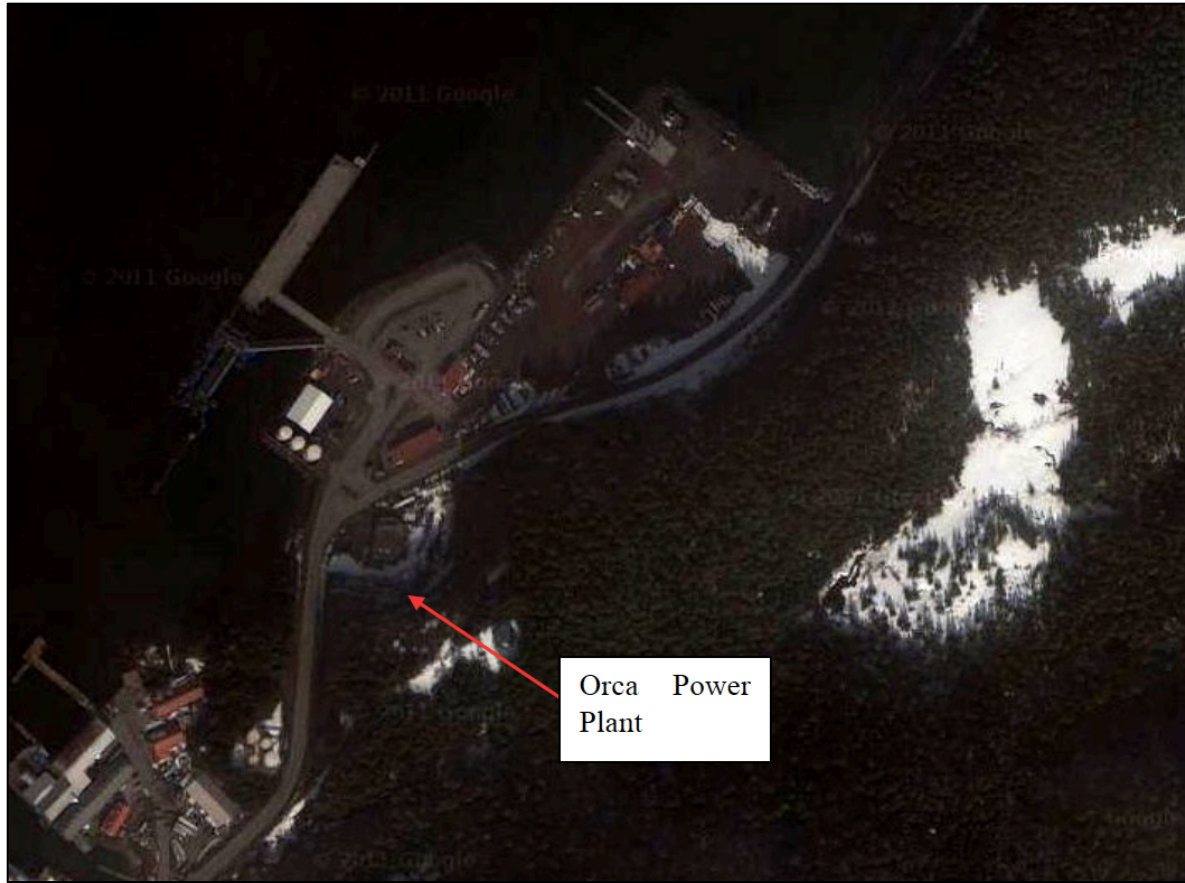


Figure 1: Google Earth image showing the location of Orca Power Plant in Cordova, Alaska.

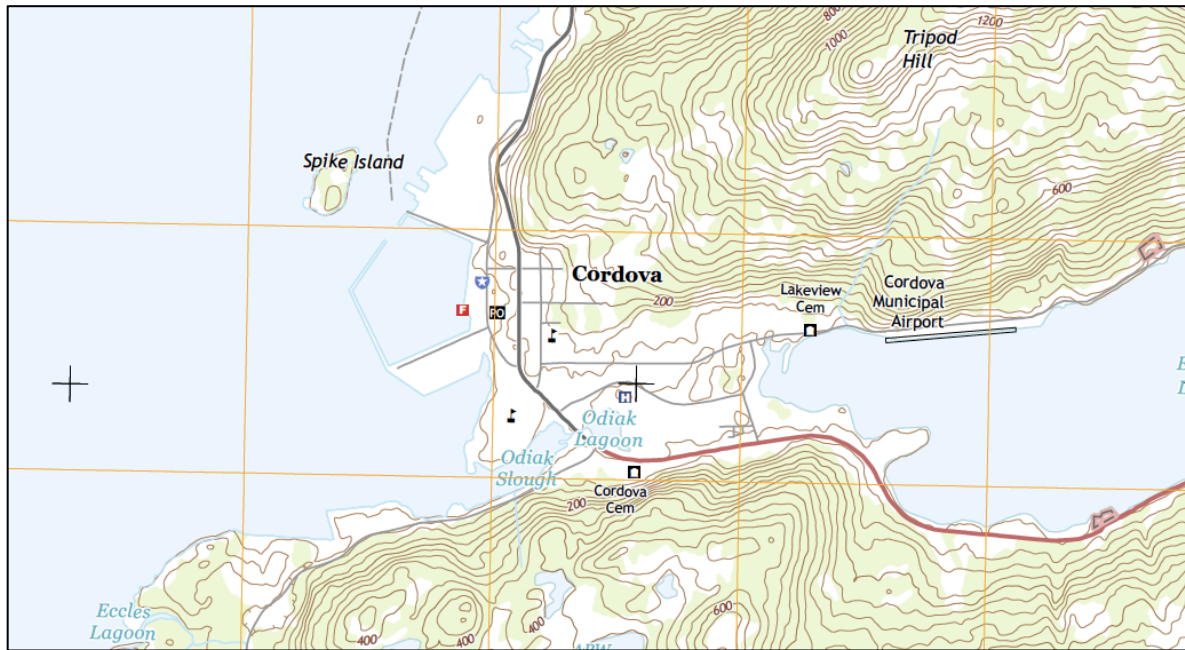


Figure 2: Location of Cordova, Alaska, USGS Topographic map, Cordova C-5 Southwest Quadrangle, Alaska 7.5 Minute Series.

Form A3 - Operating Scenario Description

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form A4 - Title V Air Operating Permit Renewal Application Information

FORM A4
Title V Air Operating Permit Renewal Application Information

Permit Number: AQ0221TVP04,
Rev. 1

1.	Permit Contact: Name	Russell Goss
	Title	Director of Generation and Distribution
	Mailing Address Line 1	PO Box 20
	Mailing Address Line 2	Cordova, AK 99574
	Phone Number	(907) 424-5044
	Email	rgoss@cordovaelectric.com
2.	Were there any changes to stationary source General Information (Form A1)? If yes, complete and submit a Form A1.	Yes: Stationary Source Contact has been updated.
3.	Were there any changes to the stationary source description (Form A2)? If yes, complete and submit a Form A2.	Yes: EU IDs 3 and 4 are replaced by EU IDs 3a and 4a.
4.	Were there any off-permit changes? Reference any notifications provided to the Department, and attach copies of the notifications.	Yes: An Off Permit Change notification was submitted to DEC on May 1 st , 2024, and EPA on May 3 rd , 2024, for the replacement of engine EU ID 3 with EU ID 3a.
	If yes, integrate changes into renewal permit? [if no, explain]	Yes
5.	Have any Alaska Title I permits been issued to the stationary source since the most recent Title V permit or revision issuance?	Yes: AQ0221MSS05 was issued on July 31, 2023.
	If yes, integrate changes into renewal permit? [If yes, please list. If no, explain]	Yes
6.	Will there be any changes to the operating scenario(s)? [if yes, describe and attach Form A3]	No
7.	Will there be any new, modified, or reconstructed emission units or air pollution control equipment? [if yes, attach appropriate forms from Form Series B, C, D, and E]	Yes: This application incorporates the new engines EU ID 3a and EU ID 4a. These engines are not “new, modified, or reconstructed” as defined in 40 CFR 60. They are subject to 40 CFR 63 Subpart ZZZZ.
8.	Are the current emissions units correctly identified and defined in the permit? [if no, attach appropriate forms from Form Series B, C, D, and E]	No: EU ID 3 needs to be updated to EU ID 3a according to the OPC submitted May 1, 2024. EU ID 4 needs to be changed to EU ID 4a as indicated in the minor permit AQ0221MSS05.
9.	Does the CAM rule [40 CFR Part 64] apply to any of the emissions units? [if yes, review the guidance provided for CAM in the Form A4 instructions for this item]	No
10.	Does the accidental release prevention regulation [40 CFR Part 68] apply to the facility? [if yes, provide the appropriate regulatory applicability document in detail.]	No
11.	Are there any other new applicable requirements? [if yes, list the new applicable requirements, emissions units, and attach the appropriate Series E Form]	No

FORM A4

Title V Air Operating Permit Renewal Application Information

12.	Are there any requested changes in the assessable potential to emit other than those identified in item 9 above? [if yes, answer the following]	No
	Are the changes a result of having better emissions information such as a new emission factor from a recent source test? [if yes, complete and attach any applicable emissions forms from Series D. Attach additional information as necessary to fully document.]	No
	Are the changes due to an increase in production? [if yes, complete and attach the applicable emissions form from Series D. Attach additional information as necessary to fully document.]	No
13.	Is the stationary source in compliance with all of the conditions of the current permit? If yes, attach a compliance certification. If no, attach a compliance schedule and/or actions taken for any out-of-compliance emission units.	Yes
14.	Are there any requested changes to testing and/or monitoring conditions? [if yes, identify the condition, the requested change, and the reason. Attach additional information as necessary to fully document.]	Yes: CEC is requesting a revision to Condition 17 of AQ0221MSS05.
15.	Are there any requested changes to monitoring conditions other than those being replaced by CAM? [if yes, identify the condition, the requested change, and the reason. Attach additional information as necessary to fully document.]	NA
16.	Are there any requested changes to recordkeeping conditions? [if yes, identify the condition, the requested change, and the reason. Attach additional information as necessary to fully document.]	Yes: CEC is requesting a revision to Condition 17 of AQ0221MSS05.
17.	Are there any requested changes to reporting conditions? [if yes, identify the condition, the requested change, and the reason. Attach additional information as necessary to fully document.]	No
18.	Are there any requested changes to the non-applicable requirements (i.e. permit shield)? [if yes, identify the emission unit, the requested change, and the reason in the appropriate Series B and/or D form. If the change applies stationary source-wide, complete the appropriate Series E form. Attach additional information as necessary to fully document.]	No
19.	Are there any other requested changes to any condition? [if yes, identify the condition, the requested change, and the reason. Attach additional information as necessary to fully document.]	No

FORM A4

Title V Air Operating Permit Renewal Application Information

Compliance Certification:

Cordova Electric Cooperative, Orca Power Plant is currently in compliance with all applicable state and federal air quality regulations, as well as the conditions of its permit. As required by 40 CFR 71.5(c)(8)(ii)(A) and (iii)(A), Cordova Electric Cooperative hereby states that the stationary source will continue to comply with applicable requirements with which the source is in compliance. For applicable requirements that will become effective during the permit term, Cordova Electric Cooperative will meet such requirements on a timely basis, as specified in 40 CFR 71.5(c)(8)(ii)(B). In accordance with 71.5(c)(9)(iii), Cordova Electric Cooperative will submit an annual compliance certification by March 31 of each year for all applicable requirements included in the Title V permit.

Statement of 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.

Clay Koplin _____

Name of Responsible Official

Chief Executive Officer _____

Title

Clay R. Koplin

Signature (blue ink)

6/11/24

Date

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B - Emission Unit Listing for this Application

FORM B
Emission Unit Listing For This Application

Permit Number AQ0221TVP04, Rev. 1

EMISSION UNIT LISTING: New, Modified, Previously Unpermitted, Replaced, Deleted					
Emission Unit ID Number	Emission Unit Name	Brief Emission Unit Description	Rating/Size	Construction Date	Notes
Emission Units To Be ADDED By This Application (New, Previously Unpermitted, or Replacement)					
3a	Diesel Electric Generator #5a	Caterpillar 3508BDITA, diesel engine	1,000 kW 1,480 bhp	2024 (Mfg. 2004)	Startup: 5/15/2024
4a	Diesel Electric Generator #6a	Caterpillar 3512BDITA, diesel engine	1,620 kW 2,172 bhp	2023 (Mfg. 1999)	Startup: 8/31/2023
Emission Units To Be MODIFIED By This Application					
None.					
Emission Units To Be DELETED By This Application					
3	Diesel Electric Generator #5	Caterpillar 3516	1,090 kW (1,469 bhp)	Installed: 2000	Removed: ~July 15, 2023
4	Diesel Electric Generator #6	Caterpillar 3516	1,090 kW (1,469 bhp)	Installed: 2000	Removed: ~April 15, 2024
EU 5a	Boiler	Burnham boiler, PV905A	0.394 MMBtu/hr	Installed: 2008	Removed: ~9/15/2022
EU 6	Boiler	Burnham boiler, AFG	0.394 MMBtu/hr	Installed: 1984	Removed: ~6/15/2021
8-IEU	Tank	Diesel Fuel Storage Tank #2	10,000 Gallons	Installed: 1984	Decommission: ~3/28/2024 Removal Planned Summer 2024
9-IEU	Tank	Lube Oil Storage Tank #3	8,000 Gallons	Installed: 1984	Removed: ~9/15/2023

SIGNIFICANT EMISSION UNIT LISTING: Title V permitted emission units that have not been modified				
Emission Unit ID Number	Emission Unit Name	Brief Emission Unit Description	Rating/Size	Installation Date
1	Diesel Electric Generator #3	GM EMD 20-645 E4, diesel engine	2,500 kW 3,600 bhp	1985
2	Diesel Electric Generator #4	Fairbanks Morse 38TD8-1/8, diesel engine	2,403 kW 3,360 bhp	1984
10	Diesel Electric Generator #7	GM EMD 20-710 GC-T2, diesel engine	3,580 kW 5,000 bhp	2009

*3a and 4a are also significant. Details given for these engines above.

INSIGNIFICANT EMISSION UNIT LISTING: Insignificant Title V permitted emission units that have not been modified				
Emission Unit Name	Brief Emission Unit Description	Rating/Size	Construction Date	Basis for Insignificant Status
7-IEU	Diesel Fuel Storage Tank #1	15,000 Gallons	1984	18 AAC 50.326(g)(21)
11-IEU	Smart Ash Cyclonic Burn Barrel	64 lb/hr	NA	18 AAC 50.326(e)

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B2.1 - EU Detail Form (Internal Combustion Equipment), EU ID 1

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0221TVP04,
Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 1
2.	Date installation/construction commenced ¹	
3.	Date installed	1985
4.	Emission Unit serial number	77D1-1108
5.	Special control requirements? [if yes, describe]	
6.	Manufacturer and model number	GM EMD 20-645 E4
7.	Type of combustion device	Internal Combustion Engine
8.	Rated design capacity (horsepower rating for engines)	3,600 brake hp
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	
10.	If used for power generation, electrical output (kW)	2,500 kW _e

¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
 - NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
 - NSPS Subparts GG and KKKK, and NESHAP Subpart YYYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
ULSD Fuel	184 gph*

* Hourly firing rate estimated based on assumed heat rate of 7,000 btu/hp-hr.

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: NA
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FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
Please note: Title V conditions referenced below were amended in AQ0221MSS05 and adopted into the Title V permit by administrative amendment. Please refer to the minor permit for full language of revised conditions.					
AQ0221TVP04 Condition 1	18 AAC 50.055(a)(1)	Visible Emissions (Opacity)	20% opacity, 6-minute average	Yes	Conditions 2 through 4
AQ0221TVP04 Condition 5	18 AAC 50.055(b)(1)	Particulate Matter	0.05 gr/dscf	Yes	Condition 6 through 8
AQ0221TVP04 Condition 9	18 AAC 50.18 AAC 50.055(c)	Fuel Sulfur Standard	500 ppm, 3-hour average	Yes	Condition 10
AQ0221TVP04 Condition 12	AQ0221MSS05 Condition 14	SO ₂ AAAQS, 3-hr and 24-hr standards	0.0015 wt%S	Yes	AQ0221TVP04 Conditions 12.1 through 12.3
AQ0221TVP04 Condition 13	AQ0221MSS05 Condition 15	NO ₂ AAAQS, Annual standard	Refers to Condition 14	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04 Condition 14	AQ0221MSS05 Conditions 17-20	NO _x PSD Avoidance	248 TPY NO _x	Yes	AQ0221TVP04 Conditions 14.1 through 14.6, 15 and 16 Revisions requested to this condition. Please refer to Forms E-2.
AQ0221TVP04 Condition 28	40 CFR 63, Subpart A	Hazardous Air Pollutants	NESHAP General Requirements	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04 Conditions 29-31	40 CFR 63 Subpart ZZZZ	Hazardous Air Pollutants	Work Practice and Management Standards	Yes	Condition 32

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60, Subpart IIII	This stationary compression ignition reciprocating internal combustion engines (RICE) was constructed prior to July 11, 2005, and have not been modified or reconstructed since that time.
40 CFR 63, Subpart ZZZZ, numerical CO emission limits in Table 2d.	Pursuant to 40 CFR 63.6603(b), these emission units do not have to meet the numerical CO emission limits in Table 2d because this source is an area source whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS), more than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.
40 CFR Part 63, Subpart ZZZZ, paragraphs 63.6600, 6601, 6602, 6603(a), (c), (d), (e), and (f), 6610, 6611, 6612, 6615, 6620, 6625, 6630, 6635, 6640, 6645, 6650, and 6655(a), (b), (c), (d), and (f)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP with no applicable emission standards. These requirements do not apply.
40 CFR Part 63, Subpart ZZZZ, paragraph 63.6604(a)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP in an area of Alaska that meets either § 63.6603(b)(1) or § 63.6603(b)(2). This source is an area source located in an area of Alaska that is not accessible by the Federal Aid Highway System (FAHS) and whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS). More than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B2.2 - EU Detail Form (Internal Combustion Equipment), EU ID 2

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0221TVP04,
Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 2
2.	Date installation/construction commenced ¹	
3.	Date installed	1984
4.	Emission Unit serial number	38D883025TDS12
5.	Special control requirements? [if yes, describe]	
6.	Manufacturer and model number	Fairbanks Morse 38TD8-1/8
7.	Type of combustion device	Internal Combustion Engine
8.	Rated design capacity (horsepower rating for engines)	3,360 brake hp
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	
10.	If used for power generation, electrical output (kW)	2,403 kW _e

¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
- NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
- NSPS Subparts GG and KKKK, and NESHAP Subpart YYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
ULSD Fuel	172 gph*

* Hourly firing rate estimated based on assumed heat rate of 7,000 btu/hp-hr.

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: NA
-----	--

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
Please note: Title V conditions referenced below were amended in AQ0221MSS05 and adopted into the Title V permit by administrative amendment. Please refer to the minor permit for full language of revised conditions.					
AQ0221TVP04 Condition 1	18 AAC 50.055(a)(1)	Visible Emissions (Opacity)	20% opacity, 6-minute average	Yes	Conditions 2 through 4
AQ0221TVP04 Condition 5	18 AAC 50.055(b)(1)	Particulate Matter	0.05 gr/dscf	Yes	Condition 6 through 8
AQ0221TVP04 Condition 9	18 AAC 50.18 AAC 50.055(c)	Fuel Sulfur Standard	500 ppm, 3-hour average	Yes	Condition 10
AQ0221TVP04 Condition 12	AQ0221MSS05 Condition 14	SO ₂ AAAQS, 3-hr and 24-hr standards	0.0015 wt%S	Yes	AQ0221TVP04 Conditions 12.1 through 12.3
AQ0221TVP04 Condition 13	AQ0221MSS05 Condition 15	NO ₂ AAAQS, Annual standard	Refers to Condition 14	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04 Condition 14	AQ0221MSS05 Conditions 17-20	NO _x PSD Avoidance	248 TPY NO _x	Yes	AQ0221TVP04 Conditions 14.1 through 14.6, 15 and 16 Revisions requested to this condition. Please refer to Forms E-2.
AQ0221TVP04 Condition 28	40 CFR 63, Subpart A	Hazardous Air Pollutants	NESHAP General Requirements	Yes	Based on reasonable inquiry.
AQ0221TVP04 Condition 29-31	40 CFR 63 Subpart ZZZZ	Hazardous Air Pollutants	Work Practice and Management Standards	Yes	Condition 32

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60, Subpart IIII	This stationary compression ignition reciprocating internal combustion engines (RICE) was constructed prior to July 11, 2005, and have not been modified or reconstructed since that time.
40 CFR 63, Subpart ZZZZ, numerical CO emission limits in Table 2d.	Pursuant to 40 CFR 63.6603(b), these emission units do not have to meet the numerical CO emission limits in Table 2d because this source is an area source whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS), more than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.
40 CFR Part 63, Subpart ZZZZ, paragraphs 63.6600, 6601, 6602, 6603(a), (c), (d), (e), and (f), 6610, 6611, 6612, 6615, 6620, 6625, 6630, 6635, 6640, 6645, 6650, and 6655(a), (b), (c), (d), and (f)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP with no applicable emission standards. These requirements do not apply.
40 CFR Part 63, Subpart ZZZZ, paragraph 63.6604(a)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP in an area of Alaska that meets either § 63.6603(b)(1) or § 63.6603(b)(2). This source is an area source located in an area of Alaska that is not accessible by the Federal Aid Highway System (FAHS) and whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS). More than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B2.3 - EU Detail Form (Internal Combustion Equipment), EU ID 3a

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0221TVP04,
Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 3a
2.	Date installation/construction commenced ¹	
3.	Date installed	May 2024; Manufactured November 2004
4.	Emission Unit serial number	1FZ02612
5.	Special control requirements? [if yes, describe]	
6.	Manufacturer and model number	Caterpillar 3508BDITA
7.	Type of combustion device	Internal Combustion Engine
8.	Rated design capacity (horsepower rating for engines)	1,480 brake hp
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	
10.	If used for power generation, electrical output (kW)	1,000 kW _e

- ¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
 - NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
 - NSPS Subparts GG and KKKK, and NESHAP Subpart YYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
ULSD Fuel	70.72 gph*

* Hourly firing rate sourced from manufacturer's specification sheet, 100% operating load rate.

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: NA
-----	--

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0221TVP04 Condition 1	18 AAC 50.055(a)(1)	Visible Emissions (Opacity)	20% opacity, 6-minute average	Yes	Conditions 2 through 4
AQ0221TVP04 Condition 5	18 AAC 50.055(b)(1)	Particulate Matter	0.05 gr/dscf	Yes	Condition 6 through 8
AQ0221TVP04 Condition 9	18 AAC 50.18 AAC 50.055(c)	Fuel Sulfur Standard	500 ppm, 3-hour average	Yes	Condition 10
AQ0221TVP04 Condition 12	AQ0221MSS05 Condition 14	SO ₂ AAAQS, 3-hr and 24-hr standards	0.0015 wt%S	Yes	AQ0221TVP04 Conditions 12.1 through 12.3
AQ0221TVP04 Condition 13	AQ0221MSS05 Condition 15	NO ₂ AAAQS, Annual standard	Refers to Condition 14	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04 Condition 14	AQ0221MSS05 Conditions 17-20	NO _x PSD Avoidance	248 TPY NO _x	Yes	AQ0221TVP04 Conditions 14.1 through 14.6, 15—16 Revisions requested to this condition. Please refer to Forms E-2.
AQ0221TVP04 Condition 28	40 CFR 63, Subpart A	Hazardous Air Pollutants	NESHAP General Requirements	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04 Condition 29-31	40 CFR 63 Subpart ZZZZ	Hazardous Air Pollutants	Work Practice and Management Standards	Yes	Condition 32

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60, Subpart IIII	This stationary compression ignition reciprocating internal combustion engines (RICE) was constructed prior to July 11, 2005, and have not been modified or reconstructed since that time.
40 CFR 63, Subpart ZZZZ, numerical CO emission limits in Table 2d.	Pursuant to 40 CFR 63.6603(b), these emission units do not have to meet the numerical CO emission limits in Table 2d because this source is an area source whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS), more than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.
40 CFR Part 63, Subpart ZZZZ, paragraphs 63.6600, 6601, 6602, 6603(a), (c), (d), (e), and (f), 6610, 6611, 6612, 6615, 6620, 6625, 6630, 6635, 6640, 6645, 6650, and 6655(a), (b), (c), (d), and (f)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP with no applicable emission standards. These requirements do not apply.
40 CFR Part 63, Subpart ZZZZ, paragraph 63.6604(a)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP in an area of Alaska that meets either § 63.6603(b)(1) or § 63.6603(b)(2). This source is an area source located in an area of Alaska that is not accessible by the Federal Aid Highway System (FAHS) and whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS). More than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B2.4 - EU Detail Form (Internal Combustion Equipment), EU ID 4a

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0221TVP04,
Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 4a
2.	Date installation/construction commenced ¹	
3.	Date installed	August 31, 2023; MY 1999
4.	Emission Unit serial number	6WN00419
5.	Special control requirements? [if yes, describe]	
6.	Manufacturer and model number	Caterpillar 3512BDITA
7.	Type of combustion device	Internal Combustion Engine
8.	Rated design capacity (horsepower rating for engines)	2,153 brake hp
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	
10.	If used for power generation, electrical output (kW)	1,500 kWe

- ¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
 - NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
 - NSPS Subparts GG and KKKK, and NESHAP Subpart YYYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
ULSD Fuel	107.86 gph*

* Hourly firing rate sourced from manufacturer's specification sheet, 100% operating load rate.

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: NA
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FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
Please note: Title V conditions referenced below were amended in AQ0221MSS05 and adopted into the Title V permit by administrative amendment. Please refer to the minor permit for full language of revised conditions.					
AQ0221TVP04, Rev. 1 Condition 1	18 AAC 50.055(a)(1)	Visible Emissions (Opacity)	20% opacity, 6-minute average	Yes	Conditions 2 through 4
AQ0221TVP04, Rev. 1 Condition 5	18 AAC 50.055(b)(1)	Particulate Matter	0.05 gr/dscf	Yes	Condition 6 through 8
AQ0221TVP04, Rev. 1 Condition 9	18 AAC 50.18 AAC 50.055(c)	Fuel Sulfur Standard	500 ppm, 3-hour average	Yes	Condition 10
AQ0221TVP04, Rev. 1 Condition 12	AQ0221MSS05 Condition 14	SO ₂ AAAQS, 3-hr and 24-hr standards	0.0015 wt%S	Yes	AQ0221TVP04 Conditions 12.1 through 12.3
AQ0221TVP04, Rev. 1 Condition 13	AQ0221MSS05 Condition 15	NO ₂ AAAQS, Annual standard	Refers to Condition 14	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 14	AQ0221MSS05 Conditions 17-20	NO _x PSD Avoidance	248 TPY NO _x	Yes	AQ0221TVP04 Conditions 14.1 through 14.6, 15—16 Revisions requested to this condition. Please refer to Forms E-2.
AQ0221TVP04, Rev. 1 Condition 28	40 CFR 63, Subpart A	Hazardous Air Pollutants	NESHAP General Requirements	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 29-31	40 CFR 63 Subpart ZZZZ	Hazardous Air Pollutants	Work Practice and Management Standards	Yes	Condition 32

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60, Subpart IIII	This stationary compression ignition reciprocating internal combustion engines (RICE) was constructed prior to July 11, 2005, and have not been modified or reconstructed since that time.
40 CFR 63, Subpart ZZZZ, numerical CO emission limits in Table 2d.	Pursuant to 40 CFR 63.6603(b), these emission units do not have to meet the numerical CO emission limits in Table 2d because this source is an area source whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS), more than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.
40 CFR Part 63, Subpart ZZZZ, paragraphs 63.6600, 6601, 6602, 6603(a), (c), (d), (e), and (f), 6610, 6611, 6612, 6615, 6620, 6625, 6630, 6635, 6640, 6645, 6650, and 6655(a), (b), (c), (d), and (f)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP with no applicable emission standards. These requirements do not apply.
40 CFR Part 63, Subpart ZZZZ, paragraph 63.6604(a)	These engines are existing, non-emergency, stationary compression ignition RICE located at an area source of HAP in an area of Alaska that meets either § 63.6603(b)(1) or § 63.6603(b)(2). This source is an area source located in an area of Alaska that is not accessible by the Federal Aid Highway System (FAHS) and whose only connection to the Federal Aid Highway System (FAHS) is through the Alaska Marine Highway System (AMHS). More than 10 percent of the power generated is used for residential purposes, and the generating capacity of this source is less than 12 megawatts.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B2.5 - EU Detail Form (Internal Combustion Equipment), EU ID 10

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0221TVP04, Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 10
2.	Date installation/construction commenced ¹	
3.	Date installed	2009
4.	Emission Unit serial number	08-M1-1022
5.	Special control requirements? [if yes, describe]	
6.	Manufacturer and model number	EMD 20-710GC-T2
7.	Type of combustion device	Internal Combustion Engine
8.	Rated design capacity (horsepower rating for engines)	5,000 bhp
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	
10.	If used for power generation, electrical output (kW)	3,850 kWe

- ¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
- NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
- NSPS Subparts GG and KKKK, and NESHAP Subpart YYYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
ULSD Fuel	255 gph*

*Firing rate based upon assumed heat rate of 7,000 btu/hp-hr.

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: NA
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FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
Please note: Title V conditions referenced below were amended in AQ0221MSS05 and adopted into the Title V permit by administrative amendment. Please refer to the minor permit for full language of revised conditions.					
AQ0221TVP04, Rev. 1 Condition 1	18 AAC 50.055(a)(1)	Visible Emissions (Opacity)	20% opacity, 6-minute average	Yes	Conditions 2 through 4
AQ0221TVP04, Rev. 1 Condition 5	18 AAC 50.055(b)(1)	Particulate Matter	0.05 gr/dscf	Yes	Conditions 6 through 8
AQ0221TVP04, Rev. 1 Condition 9	18 AAC 50.18 AAC 50.055(c)	Fuel Sulfur Standard	500 ppm, 3-hour average	Yes	Condition 10
AQ0221TVP04, Rev. 1 Condition 11	AQ0221MSS05 Condition 16	Minor Permit Avoidance	SO ₂ limit	Yes	AQ0221TVP04 Condition 12
AQ0221TVP04, Rev. 1 Condition 12	AQ0221MSS05 Condition 14	SO ₂ AAAQS, 3-hr and 24-hr standards	0.0015 wt%S	Yes	AQ0221TVP04 Conditions 12.1 through 12.3
AQ0221TVP04, Rev. 1 Condition 13	AQ0221MSS05 Condition 15	NO ₂ AAAQS, Annual standard	Refers to Condition 12	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 14	AQ0221MSS05 Conditions 17-20	NO _x PSD Avoidance	248 TPY NO _x	Yes	AQ0221TVP04 Conditions 14.1 through 14.6, 15, 16, and 17 Revisions requested to this condition. Please refer to Forms E-2.
AQ0221TVP04, Rev. 1 Conditions 19-24	40 CFR 60, Subpart A	Criteria Pollutants	NSPS General Requirements	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1 Conditions 25-26	40 CFR 60 Subpart IIII	New Source Performance Standard	Emission standards	Yes	Conditions 27

FORM B2**Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)**

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0221TVP04, Rev. 1 Condition 28	40 CFR 63, Subpart A	Hazardous Air Pollutants	NESHAP General Requirements	Yes	Compliance based on reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 29	40 CFR 63, Subpart ZZZZ	Compliance with 40 CFR 60 Subpart III	Work practices	Yes	Condition 29.1

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60.8(b) through (e).	The Permittee has already complied with the initial notification requirements for this engine. The shield will be applicable to this engine until modified, reconstructed or replaced.
40 CFR 63, Subpart ZZZZ	Pursuant to 40 CFR 63.6590(a)(2)(iii), this emission unit is a new stationary RICE because it was constructed after June 12, 2006. Pursuant to 40 CFR 63.6590(c)(1), this emission unit has no requirements under 40 CFR 63, Subpart ZZZZ because it is a new RICE located at an area source of HAP. This engine meets the requirements of 40 CFR 63, Subpart ZZZZ by meeting the requirements of 40 CFR 60, Subpart IIII.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B3 - EU Detail Form (Incinerators), IEU 11 Smart Ash

FORM B3
Emission Unit Detail Form - Incinerators

Permit Number: AQ0215TVP04, Rev. 1

1.	Emission Unit ID Number // Operating Scenario	N/A - 11-IEU
2.	Date installation/construction commenced ¹	N/A
3.	Date installed	N/A
4.	Emission Unit serial number	
5.	Special control requirements? [if yes, describe]	No
6.	Manufacturer	Elastec (or similar)
7.	Waste classification	Industrial
8.	Type of incinerator	Smart Ash burn barrel
9.	Charge information:	
	batch or continuous	Batch
	charge method	Manual
	charge measurement method	Manual
10.	Primary combustion chamber information:	
	temperature (°F)	N/A
	rated heat input (MMBtu/hr)	N/A
	type/grade fuel(s)	Non-Hazardous Waste
11.	Secondary combustion chamber information:	
	temperature (°F)	N/A
	gas residency time [attach calculations]	N/A
	rated heat input (MMBtu/hr)	N/A
	type/grade fuel(s)	N/A
12.	Automatically controlled auxiliary burners?	No
13.	Interlock system to control charging?	No
14.	Air lock system?	No
15.	Waste heat boiler?	No
16.	Maximum flue gas outlet temperature (°F)	N/A
17.	Rated capacity (tons material /day)	64 lb/hr
18.	Emergency bypass stack?	No
19.	Incinerator design efficiency (%) [attach calculations]	N/A

¹ See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates.

FORM B3
Emission Unit Detail Form - Incinerators

20. Incinerated materials:

Material	Origin of material	Weight percentage (%)	Heating value (Btu/lb)
Oily rags, general household trash		100	N/A

21. Attach diagram. NA

22. Attach energy balance equations for the materials incinerated. NA

FORM B3

Emission Unit Detail Form - Incinerators

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0215TVP04 Condition 25	18 AAC 50.055(a)(1) 18 AAC 50.055(b)(1) 18 AAC 50.055(c)	Visible emissions Particulate Standard Sulfur Standard	20% opacity, 0.05 gr/dscf 500 ppm	Yes	Compliance based on certification in accordance with Condition 25.4

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B3
Emission Unit Detail Form - Incinerators

Non-applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request*):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
None.	

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form B4. - EU Detail Form - VOC Storage Tank, IEU 7

FORM B4
Emission Unit Detail Form - VOC Storage Tanks

Stationary Source Name: Orca Power Plant Permit Number: AQ0221TVP04, Rev. 1

1.	Emission Unit ID Number // Operating Scenario	EU ID 7
2.	Date installation/construction commenced	1984
3.	Date installed	1984
4.	Special control requirements? [if yes, describe]	No
5.	Manufacturer	NA
6.	Rated capacity (gallons)	EU ID 7: 15,000 gallons
7.	Tank length (ft)	NOTE: EPA Tanks 401d demonstration submitted with the 2013 TV renewal application, including tank parameters.
8.	Tank diameter (ft)	-
9.	Tank age (years)	
10.	Submerged fill pipe?	
11.	Type of tank (specify)	Horizontal
12.	Underground?	No
	If underground, specify type of tube and vapor return.	
13.	Above ground vapor control information:	
	Pipe material	
	Pipe size	
	Piping drainage (continuous drain downward or condensate collection tank – if condensate collection, attach a description)	
	Isolation valve installed in piping?	
14.	Pressure vacuum relief valves:	
	Vent pressure settings (psia)	
	Months in which relief valves removed (specify)	
15.	Pressure conservation vent? [if yes, specify pressure setting – psia]	
16.	Fixed roof tanks:	
	Roof color	
	Shell color	Green
	Average vapor space height (ft)	N/A
	Shell condition (specify)	Good

FORM B4
Emission Unit Detail Form - VOC Storage Tanks

	Emission Unit ID Number	EU ID 7
17.	Floating roof tanks:	
	Type of construction (specify)	
	Condition (specify)	
	Tank color	
	Deck type (specify)	
18.	External floating roof tanks, seal type (specify)	
19.	Internal floating roof tanks:	
	Seal type (specify)	
	Number of columns	
	Effective column diameter (ft)	
	Total deck seam length (ft)	
	Deck fitting types – access hatch	
	bolted cover, gasketed	
	unbolted cover, gasketed	
	unbolted cover, ungasketed	
	Deck fitting types - Automatic gauge float well	
	bolted cover, gasketed	
	unbolted cover, gasketed	
	unbolted cover, ungasketed	
	Deck fitting types – column well	
	Built up column – sliding cover, gasketed	
	Built up column – sliding cover, ungasketed	
	Pipe column – flexible fabric sleeve seal	
	Pipe column – sliding cover, gasketed	
	Pipe column – sliding cover, ungasketed	
	Deck fitting types – ladder well	
	sliding cover, gasketed	
	sliding cover, ungasketed	

FORM B4

Emission Unit Detail Form - VOC Storage Tanks

	Emission Unit ID Number	NA, IEU, storage tank	
19.	Deck fitting types – smple well or pipe		
	Slotted pipe – sliding cover, gasketed		
	Slotted pipe – sliding cover, ungasketed		
	Sample well – slit fabric seal, 10% open area		
	Stub drain – 1-inch diameter		
	Deck fitting type – roof leg or hanger will		
	Adjustable		
	fixed		
	Deck fitting type – vacuum breaker		
	Weighted mechanical actuation, gasketed		
	Weighted mechanical actuation, ungasketed		
20.	Maximum liquid loading rate (gal/hr)		
21	Submerged fill at out-loading (describe)		
22.	Material(s) stored		
	Type of material	Diesel fuel	
	Normal annual throughput (gal/yr)		
	Normal turnovers per year		
	Density (lbs/gal)		
	Molecular weight		
	Average storage temperature (°F)		
	Vapor pressure (psi)		

FORM B4

Emission Unit Detail Form - VOC Storage Tanks

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods
No applicable TV conditions.					

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

FORM B4
Emission Unit Detail Form - VOC Storage Tanks

Non-applicable Requirements Specific to Emission Unit (attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60, Subparts K and Ka	The specific reason given in the current Title V permit for inapplicability of these subparts should be revised as follows: EU ID 7 has a storage capacity of less than 40,000 gallons each and commenced construction after May 19, 1978.
40 CFR 60, Subparts Kb	The insignificant diesel fuel storage tank and lube oil storage tank at this source were constructed after July 24, 1984 and each has a storage capacity less than 75 cubic meters (19,813 gallons). 40 CFR 60 Subpart Kb was revised October 15, 2003.
AQ0221TVP04, Rev. 1 Condition 18 18 AAC 50.055(a)(1) 18 AAC 50.055(b)(1) 18 AAC 50.055(c) 18 AAC 50.346(b)(4)	Standard Condition V does not apply to diesel fuel storage tanks because such tanks are not an industrial process. Per 18 AAC 50.990 (49): "Industrial process" means the extraction of raw material or the physical or chemical transformation of raw material in either composition or character." Fuel storage is not an industrial process because it does not extract raw material or transform the physical or chemical composition or character of a raw material.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
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Forms D1 & D2 - Please see attached MS Excel File for Pollutant Emission
Calculations

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form E1 - Stationary Source-Wide Applicable Requirements

FORM E1
Stationary Source-Wide Applicable Requirements

Permit Number: AQ0221TVP04, Rev. 1

Stationary Source-Wide Applicable Requirements (attach additional sheets as needed):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1, Condition 38	40 C.F.R. 61, Subparts A & M, and Appendix A	Asbestos NESHAP	Work Practice	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1, Condition 39	40 C.F.R. 82, Subpart F	Refrigerant Recycling and Disposal	Work Practice	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1, Condition 40	18 AAC 50.040(c)(1), 50.040(j), & 50.326(j) 40 C.F.R. 71.6(a)(3)(ii) 40 C.F.R. 63.1(b), 63.5(b)(4), 63.6(c)(1), & 63.10(b)(3)	NESHAPs Applicability Determinations	Work Practice	Yes	AQ0221TVP04, Rev. 1 Conditions 40.1
AQ0221TVP04, Rev. 1, Condition 41	18 AAC 50.326(j)(4) & 50.040(j) 40C.F.R.60.13, 63.10(d and f), and 71.6(c)(6)	NSPS and NESHAP Reports	Work Practice	Yes	AQ0221TVP04, Rev. 1 Condition 41.1 and 41.2
AQ0221TVP04, Rev. 1, Condition 42-44	18 AAC 50.345(a) & (e), (f), and (g)	Standard Terms and Conditions	General Terms: independent permit terms, permit changes, property conveyance	Yes	NA: No monitoring method applies.
AQ0221TVP04, Rev. 1, Condition 45	18 AAC 50.326(j)(1), 50.400, 50.403, & 50.405	Administration Fees	Payment of Fees	Yes	Compliance based upon facility records and reasonable inquiry.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1, Condition 46 This condition is replaced by Cond. 3 of AQ0221MSS05	18 AAC 50.040(j)(3), 50.035, 50.326(j)(1), 50.346(b)(1), 50.410, & 50.420 40 C.F.R. 71.5(c)(3)(ii)	Assessable Emissions	Payment of fees	Yes	AQ0221MSS05, Cond. 3.1-3.2
AQ0221TVP04, Rev. 1, Condition 47 This condition is replaced by Cond. 4 of AQ0221MSS05	18 AAC 50.040(j)(3), 50.326(j)(1), 50.346(b)(1), 50.410, & 50.420 40 C.F.R. 71.5(c)(3)(ii)	Assessable Emission Estimates	Submittal of Estimates	Yes	AQ0221MSS05, Cond. 4.1-4.4
AQ0221TVP04, Rev. 1, Condition 48	18 AAC 50.045(a)	Dilution	Prohibition	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1, Condition 49	18 AAC 50.045(d), 50.040(e), 50.326(j)(3), & 50.346(c)	Reasonable Precautions to Prevent Fugitive Dust	Work Practice	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1, Condition 50	18 AAC 50.055(g)	Stack Injection	Prohibition	Yes	Compliance based upon reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 51 This condition is replaced by Cond. 33 of AQ0221MSS05	18 AAC 50.110 18 AAC 50.040(e) 18 AAC 50.326(j)(3) 18 AAC 50.346(a) 40 C.F.R. 71.6(a)(3)	Air Pollution Prohibited	Prohibition	Yes	AQ0221TVP04, Rev. 1 Conditions 51.1 through 51.5, as revised by Condition 33 of AQ0221MSS05
AQ0221TVP04, Rev. 1 Condition 52	18 AAC 50.235(a) 18 AAC 50.326(j)(4) 18 AAC 50.040(j)(4) 40 C.F.R. 71.6(c)(6)	Technology Based Emission Standard	Work Practice	Yes	Compliance based upon reasonable inquiry.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1 Condition 53	18 AAC 50.065, 50.040(j), & 50.326(j)	Open Burning	Work Practice	Yes	AQ0221TVP04, Rev. 1 Conditions 53.1 and 53.2
AQ0221TVP04, Rev. 1 Condition 54	18 AAC 50.220(a) 18 AAC 50.345(a) & (k)	Requested Source Tests	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 55	18 AAC 50.220(b)	Operating Conditions	Source Testing Work Practice	Yes	AQ0221TVP04, Rev. 1, Condition 55.1 and 55.2 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 56	18 AAC 50.040(c) 18AAC50.220(c)(1)(C) 40 C.F.R. 63	Reference Test Methods	Source Testing Work Practice	Yes	AQ0221TVP04, Rev. 1 Condition 56.1 through 56.5 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 57	18 AAC 50.220(c)(3) & 50.990(102)	Excess Air Requirements	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 58	18 AAC 50.345(a)	Test Exemption	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 59	18 AAC 50.345(a) & (l)	Test Deadline Extension	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 60	18 AAC 50.345(a)&(m)	Test Plans	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 61	18 AAC 50.345(a) & (n)	Test Notification	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1 Condition 62	18 AAC 50.345(a)&(o)	Test Reports	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 63	18 AAC 50.220(f)	PM Calculations	Source Testing Work Practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 64	18 AAC 50.326(j) 40 C.F.R 60.7(f), Subpart A 40 C.F.R.71.6(a)(3)(ii)(B)	Recordkeeping Requirements	Recordkeeping and Reporting Work practice	Yes	AQ0221TVP04, Rev. 1 Condition 64.1 and 64.2 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 65 This condition is replaced by Cond. 27 of AQ0221MSS05	18 AAC 50.345(a) & (j) 18 AAC 50.205 18 AAC 50.326(j)] 40C.F.R.71.6(a)(3)(iii)(A)	Certification	Recordkeeping and Reporting Work practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1. Condition 66 This condition is replaced by Cond. 27 of AQ0221MSS05	18 AAC 50.326(j) 40C.F.R.71.6(a)(3)(iii)(A)	Submittals	Recordkeeping and Reporting Work practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 67	18 AAC 50.345(a) & (i) 18 AAC 50.200 18 AAC 50.326(a) & (j) 40 C.F.R. 71.5(a)(2) 40 C.F.R. 71.6(a)(3)	Information Requests	Recordkeeping and Reporting Work practice	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 68	18 AAC 50.235(a)(2), 18 AAC 50.240(c), 18 AAC 50.326(j)(3) 18 AAC 50.346(b)(2) & (3)	Excess Emissions and Permit Deviation Reports	Recordkeeping and Reporting Work practice	Yes	AQ0221TVP04, Rev. 1 Conditions 68.1 through 68.3 Compliance based upon facility records and reasonable inquiry.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1 Condition 69 This condition is revised by Cond. 32.2, 32.3, and 32.4 of AQ0221MSS05	18 AAC 50.346(a) 18 AAC 50.326(j) 40C.F.R.71.6(a)(3)(iii)(A)	Operating Reports	Recordkeeping and Reporting Work practice	Yes	AQ0221TVP04, Rev. 1 Conditions 69.1 through 69.4, as revised by Conditions 32.2 and 32.3 of AQ0221MSS05. Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 70	18 AAC 50.205 18 AAC 50.345(a) & (j) 18 AAC 50.326(j) 40 C.F.R. 71.6(c)(5)	Annual Compliance Certification	Recordkeeping and Reporting Work practice	Yes	AQ0221TVP04, Rev. 1 Conditions 70.1 through 70.3 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 71	18 AAC 50.346(b)(8) 18 AAC 50.200 40 CFR 51.15 40 CFR 51.30(a)(1) & (b)(1) 40 CFR 51, Appendix A to Subpart A, 73 FR 76556	Emission Inventory Reporting	Recordkeeping and Reporting Work Practice	Yes	AQ0221TVP04, Rev. 1 Conditions 71.1 through 71.4. Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 72	18 AAC 50.040(j)(4) 18 AAC 50.326(j) 40 C.F.R. 71.6(a)(8)	Permit Applications and Submittals	Changes and Renewal Work Practices	Yes	AQ0221TVP04, Rev. 1 Condition 72.1 through 72.4 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 73	18 AAC 50.040(j)(4) 18 AAC 50.326(j) 40 C.F.R. 71.6(a)(8)	Emissions Trading	Changes and Renewal Work Practices	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 74	18 AAC 50.040(j)(4) 18 AAC 50.326(j) 40 C.F.R. 71.6(a)(12)	Off Permit Changes	Changes and Renewal Work Practices	Yes	AQ0221TVP04, Rev. 1 Condition 77.1 through 77.4 Compliance based upon facility records and reasonable inquiry.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1 Condition 75	18 AAC 50.040(j)(4) 18 AAC 50.326(j) 40 C.F.R. 71.6(a)(13)	Operational Flexibility	Changes and Renewal Work Practices	Yes	AQ0221TVP04, Rev. 1 Condition 75.1 through 75.3 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 76	18 AAC 50.040(j)(3) 18AAC50.326(c)(2)&(j)(2) 40 CFR 71.5(a)(1)(iii) 40 CFR 71.7(b) & (c)(1)(ii)	Permit Renewal	Changes and Renewal Work Practices	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Conditions 77	18 AAC 50.326(j)(3) 50.345(a) & (b) 40 C.F.R. 71.6(f)(1)	General compliance with permit terms and inapplicable requirements	General Terms	Yes	AQ0221TVP04, Rev. 1 Condition 77.1 and 77.2 This term requires no action in order to comply and contains statements with which the permittee generally agrees.
AQ0221TVP04, Rev. 1 Condition 78	18 AAC 50.040(j), 18 AAC 50.326(j) 18 AAC 50.345(a) & (c)	Comply with each permit term and condition	General Terms	Yes	AQ0221TVP04, Rev. 1 Condition 78.1 and 78.2 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 79	18 AAC 50.040(j), 18 AAC 50.326(j) 40 C.F.R. 71.6(c)(3) 40 C.F.R. 71.5(c)(8)(iii)(A)	Continual compliance required	General Terms	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 80	18 AAC 50.326(j)(3) 18 AAC 50.345(a) & (d)	It is not a defense...	General Terms	Yes	This term requires no action to comply and contains statements with which the permittee generally agrees.

FORM E1
Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
AQ0221TVP04, Rev. 1 Condition 81	18 AAC 50.326(j)(3) 18 AAC 50.345(a) & (h)	Allow Department inspectors to enter premises, access records	General Terms	Yes	AQ0221TVP04, Rev. 1, Condition 81.1 through 81.4 Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 82	18 AAC 50.326(j)(3) 18 AAC 50.345(a) & (h)	Comply with requirements that become applicable during the permit term	General Terms	Yes	Compliance based upon facility records and reasonable inquiry.
AQ0221TVP04, Rev. 1 Condition 83-84	18 AAC 50.326(j) 40 C.F.R. 71.6(f)(3)(i) & (ii)	Permit as a shield	General Terms	Yes	Compliance based upon facility records and reasonable inquiry.
<p>NOTE: For all requirements listed above, except those that do not apply, the full text and regulatory citations have been provided to the Department in the attached Title V permit, which is effective as of the date of this submittal. All requirements referred to herein will apply to the source upon issuance of the renewal with no changes. If you require additional information about the applicability of state or federal requirements, please refer to the current Title V permit.</p>					

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

Cordova Electric Cooperative
Orca Power Plant

Title V Renewal Application
June 2024

Form E2 - Permit-to-Operate and Minor Permit Condition Change Request

FORM E2

Permit-to-Operate and Minor Permit Condition Change Request

Permit Number: AQ0221TVP04, Rev. 1

Permit-to-Operate and Minor Permit Information (attach additional sheets as needed):

Permit-to-Operate or Minor Permit Number	Condition Number	Type of change (revise or remove)	Reason for change	Requested Alaska Title V Operating Permit Condition
AQ0221MSS05	Table A – EU Inventory	Revise	EU ID 3a replaces EU ID 3, as authorized in an OPC submitted May 1, 2024.	Table A to AQ0221TVP04, Rev. 1.
AQ0221MSS05	Table C – NOx emission factors	Revise	CEC is applying to revise the minor permit, which includes a request to incorporate the NOx emission factor for EU ID 3a into Table C of the minor permit. The installation and operation of EU ID 3a was authorized through an OPC, with the understanding that emission factors for EU ID 3 (which are higher) will be used to calculate NOx emissions until such time that the table is formally revised. The application to accomplish this request is being submitted under separate cover, and with a request for integrated review.	Condition 14
AQ0221MSS05	Conditions 17	Revise	In the same application described above, CEC is requesting to change the method of calculation in the NOx ORL. Please refer to the application to review AQ0221MSS05 for more detail.	Condition 14

Attachment A - Title V Operating Permit AQ0221TVP04, Rev. 1

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL OPERATING PERMIT
ADMINISTRATIVE AMENDMENT

Permit No. AQ0221TVP04
Revision 1: FINAL - September 21, 2023

Issue Date: December 12, 2019
Expiration Date: December 12, 2024

The Alaska Department of Environmental Conservation, under the authority of AS 46.14, 18 AAC 50.326, and 40 CFR 71.7(d)(1)(v), incorporates the provisions of Minor Permit AQ0221MSS05 into Operating Permit AQ0221TVP04 by administrative amendment.

These permits are issued to Cordova Electric Cooperative, Inc. for the Orca Power Plant. Cordova Electric Cooperative, Inc. is required to continue complying with Operating Permit AQ0221TVP04 except as revised in Operating Permit AQ0221TVP04 Revision 1.

This action is a final action for the purposes of establishing an operating permit shield under 40 CFR 71.7(d)(4).



James R. Plosay
Manager, Air Permits Program

Table 1 - Changes due to Minor Permit AQ0221MSS05

The conditions of Operating Permit AQ0221TVP04 listed in Column 1 of this table are replaced by the conditions of Minor Permit AQ0221MSS05 listed in Column 2.	
Column 1: AQ0221TVP04 Conditions	Column 2: AQ0221MSS05 Conditions
Table A	Table A
Condition 46	Condition 3
Condition 47 (including all sub-conditions)	Condition 4 (including all sub-conditions)
Condition 1 (including all sub-conditions)	Condition 5 (including all sub-conditions)
Condition 2 (including all sub-conditions)	Condition 6 (including all sub-conditions)
Condition 3 (including all sub-conditions)	Condition 7 (including all sub-conditions)
Condition 4 (including all sub-conditions)	Condition 8 (including all sub-conditions)
Condition 5 (including all sub-conditions)	Condition 9 (including all sub-conditions)
Condition 6 (including all sub-conditions)	Condition 10 (including all sub-conditions)
Condition 7 (including all sub-conditions)	Condition 11 (including all sub-conditions)
Condition 8 (including all sub-conditions)	Condition 12 (including all sub-conditions)
Condition 9	Condition 13
Condition 12 (including all sub-conditions)	Condition 14 (including all sub-conditions)
Condition 13	Condition 15
Condition 11	Condition 16
Condition 14 (including all sub-conditions)	Condition 17 (including all sub-conditions)
Condition 15	Condition 18
Condition 16	Condition 19
Condition 17 (including all sub-conditions)	Condition 20 (including all sub-conditions)
Condition 28	Condition 21
Condition 29	Condition 22
Condition 29.2	Condition 22.1
Condition 30 (including all sub-conditions)	Condition 23 (including all sub-conditions)
Condition 31 (including all sub-conditions)	Condition 24 (including all sub-conditions)
Condition 32 (including all sub-conditions)	Condition 25 (including all sub-conditions)
Conditions 33 through 37 (including all sub-conditions)	Condition 26 (including all sub-conditions)
Conditions 65 and 66 (including all sub-conditions)	Conditions 27 and 28 (including all sub-conditions)
Condition 68 (including all sub-conditions)	Condition 31 (including all sub-conditions)

The conditions of Operating Permit AQ0221TVP04 listed in Column 1 of this table are replaced by the conditions of Minor Permit AQ0221MSS05 listed in Column 2.	
Column 1: AQ0221TVP04 Conditions	Column 2: AQ0221MSS05 Conditions
Condition 69.2 (including all sub-conditions)	Condition 32.2 (including all sub-conditions)
Condition 69.3	Condition 32.3 (including all sub-conditions)
Condition 69.4 (including all sub-conditions)	Condition 32.4 (including all sub-conditions)
Condition 51 (including all sub-conditions)	Condition 33 (including all sub-conditions)

The authority line for each provision listed in Column 1 above is changed by adding:
[Minor Permit AQ0221MSS05, 7/31/2023].

The Technical Analysis Report for Minor Permit AQ0221MSS05 is incorporated by reference as a supplement to the Statement of Basis for Operating Permit AQ0221TVP04.