

**Alaska Department of Environmental Conservation  
Air Permits Program**

**Technical Analysis Report  
For the terms and conditions of  
Minor Permit AQ0315MSS02 Revision 1**

**Issued to Aurora Energy, LLC**

**For the Chena Power Plant**

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**Preliminary – September 20, 2024**

## 1. INTRODUCTION

This Technical Analysis Report (TAR) provides the Alaska Department of Environmental Conservation's (Department's) basis for issuing Minor Permit AQ0315MSS02 Revision 1 to Aurora Energy, LLC (Aurora) for the Chena Power Plant. On September 8, 2017, the US Environmental Protection Agency (EPA) reclassified the Fairbanks North Star Borough (FNSB) area as a Serious Nonattainment Area (NAA) effective June 9, 2017, with regard to nonattainment of the 2006 24-hour PM<sub>2.5</sub> National Ambient Air Quality Standards (NAAQS).<sup>6</sup> According to 40 C.F.R. 51.1010, the state shall identify, adopt, and implement best available control measures (BACM) and best available control technology (BACT) on sources of direct PM<sub>2.5</sub> emissions and sources of emissions of PM<sub>2.5</sub> plan precursors (NO<sub>x</sub>, SO<sub>2</sub>, NH<sub>3</sub>, VOCs) located in any Serious PM<sub>2.5</sub> nonattainment area. Major stationary sources<sup>7</sup> are subject to site-specific review for BACT. Those emission sources that are not classified as major stationary sources and subject to BACT are subject to BACM requirements.

the Chena Power Plant is a major stationary source located within the FNSB. To comply with BACM and BACT requirements. Aurora Energy, LLC applied for a permit under AS 46.14.130(c)(2) because the Department found that public health or air quality effects provided a reasonable basis to regulate the stationary source. The Department issued Minor Permit AQ0315MSS02 on June 15, 2021, which focused exclusively on fuel limits to control SO<sub>2</sub> emissions.

On July 30, 2024, the Department sent Aurora Energy, LLC a notice of intent to revoke and reissue Minor Permit AQ0315MSS02 (and AQ0315TVP04 Revision 2) under AS 46.14.280(a)(2). With the re-issuance as Minor Permit AQ0315MSS02 Revision 1, the Department maintains AS 46.14.130(c)(2) as the basis for the permit issuance, because the Department finds that public health or air quality effects still provide a reasonable basis to regulate the stationary source. This finding for the FNSB NAA SIP is contained in the State Air Quality Control Plan adopted on November 19, 2019, with amendments adopted on November 18, 2020.<sup>8</sup>

The Department is preparing a new comprehensive SIP with a new determination that SO<sub>2</sub> BACT limits for major stationary sources are, at this point, not required to satisfy the State's obligations under the Clean Air Act requirements for stationary sources in the NAA. This new determination is predicated on the SO<sub>2</sub> precursor demonstration allowed under 40 C.F.R. 51.1010(a)(2)(iii).

Given that the Department originally issued Minor Permit AQ0315MSS02 for the sole purpose of implementing SO<sub>2</sub> controls identified in the FNSB NAA SIP for the Chena Power Plant, The Department now finds no underlying basis for issuing such permit. Additionally, the EPA's *Air Plan Partial Approval and Partial Disapproval; AK, Fairbanks North Star Borough; 2006 24-hour PM<sub>2.5</sub> Serious Area and 189(d) Plan*<sup>9</sup> published in the *Federal Register* on December 5, 2023 (88 Fed. Reg. 84658) disapproved the lack of monitoring, recordkeeping, and reporting (MR&R) initially proposed by the Department for PM<sub>2.5</sub> emissions from the Chena Power Plant.

Therefore, with the reissuance of Minor Permit AQ0315MSS02 Revision 1, the Department has rescinded all of the previous BACT/BACM SO<sub>2</sub> requirements in Section 3 of Minor Permit AQ0315MSS02 that originated from the FNSB NAA SIP, and has replaced them with the PM<sub>2.5</sub>

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<sup>6</sup> Background and detailed information regarding the Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) can be found at <http://dec.alaska.gov/air/anpms/communities/fbks-pm2-5-serious-sip/>.

<sup>7</sup> Per 40 C.F.R. 51.165(a)(1)(iv)(A)(1)(vii) and (viii), a major stationary source in any serious nonattainment area for PM<sub>2.5</sub> is any stationary source with emissions at least 70 TPY of PM<sub>2.5</sub> or any individual PM<sub>2.5</sub> precursor. SO<sub>2</sub> is a precursor to PM<sub>2.5</sub>.

<sup>8</sup> See Footnote 10.

<sup>9</sup> The EPA's Air Plan Partial Approval and Partial Disapproval; AK, Fairbanks North Star Borough; 2006 24-hour PM<sub>2.5</sub> Serious Area and 189(d) Plan can be found at <https://www.regulations.gov/document/EPA-R10-OAR-2022-0115-0426>.

requirements from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024.<sup>10</sup> Additionally, On August 23, 2024, EPA's NAA Project Lead Matt Jentgen sent the Department a letter recommending certain requirements be contained in the Department's NAA minor permit for the Zehnder Facility in order to satisfy certain Clean Air Act requirements. The EPA letter recommended that Minor Permit AQ0109MSS01 Rev. 1 be revised to contain conditions to ensure that the reporting obligations of the minor permit are independent of the operating permit. In light of the EPA's disapproval comments and August 23, 2024 letter, the Department has also included additional MR&R requirements in this minor permit revision to make the SIP requirements enforceable. Section 3 of this minor permit will be incorporated into the Department's upcoming final SIP submittal as an appendix to the Control Strategies Chapter.

With the issuance of Minor Permit AQ0315MSS02 Revision 1, the Chena Power Plant's potential SO<sub>2</sub> emissions will revert to the levels in place upon the issuance of AQ0315MSS02 before the SO<sub>2</sub> limits went into effect on June 9, 2021. The Department does not consider this change to be a potential or actual emissions increase under 18 AAC 50.502(c)(3), or a potential or net emissions increase under 40 C.F.R. 52.21(b).

## 2. STATIONARY SOURCE DESCRIPTION

The Chena Power Plant is a co-generation power plant that is designed to supply the local power grid with up to 27.5 megawatts of electrical power and provide steam and hot water heat to commercial and residential customers in the city of Fairbanks. The plant is located adjacent to the Chena River in downtown Fairbanks, Alaska. The SIC code for this stationary source is 4911. The stationary source is located within a nonattainment area for PM-2.5.

The emissions unit (EU) inventory consists of three 76.8 MMBtu/hr coal-fired boiler, one 254.7 MMBtu/hr coal-fired boiler, an ash vacuum pump exhaust for a baghouse, a coal stockpile, a coal preparation plant, a truck bay ash loadout.

## 3. APPLICATION DESCRIPTION

The Department is processing Minor Permit AQ0315MSS02 Revision 1 under the Department's revoke and reissuance procedures under AS 46.14.280(a)(2), and therefore no permit application was submitted by the Permittee. The Department sent Aurora Energy, LLC a Notice of Intent to Revoke and Reissue Minor Permit AQ0315MSS02 and Title V Operating Permit AQ0315TVP04 Revision 2 for Aurora Energy, LLC's Chena Power Plant under AS 46.14.280(a)(2) on July 30, 2024. Minor Permit AQ0315MSS02 Revision 1 includes the PM<sub>2.5</sub> requirements from the FNSB Serious NAA SIP Amendments public noticed on August 29, 2024.

## 4. CLASSIFICATION FINDINGS

The Department finds that:

1. Minor Permit AQ0315MSS02 Revision 1 is classified under AS 46.14.130(c)(2) because a finding by the Department that public health or air quality effects provide a reasonable basis to regulate

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<sup>10</sup> Background and detailed information regarding Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) Amendments public noticed on August 29, 2024 can be found at <https://dec.alaska.gov/air/anpms/sip/2024-fbks-pm2-5-serious-sip-amends/>.

the stationary source. This finding is contained in the FNSB NAA SIP adopted on November 19, 2019,<sup>11</sup> with amendments adopted on November 18, 2020.

### 5. EMISSIONS SUMMARY AND PERMIT APPLICABILITY

A summary of the potential to emit (PTE) and assessable PTE for the stationary source based on limits before June 9, 2021 and limits that will take effect on June 9, 2021, as determined by the Department, is shown in Table G below.

**Table G – PTE Summary and Assessable Emissions**

Description	PTE, TPY						
	NOx	CO	PM <sub>10</sub>	PM <sub>2.5</sub> <sup>1</sup>	SO <sub>2</sub>	VOC	Total <sup>1</sup>
<b>Pre-June 9, 2021</b>							
Stationary Source PTE	934.9	557.9	123.2	123.2	<b>1,983.1</b>	3.1	<b>3,602.2</b>
Assessable Emissions	935	558	123	N/A	<b>1,983</b>	0	<b>3,599</b>
<b>June 9, 2021</b>							
Stationary Source PTE	934.9	557.9	123.2	123.2	<b>639.5</b>	3.1	<b>2258.6</b>
Assessable Emissions	935	558	123	N/A	<b>640</b>	0	<b>2,256</b>
<b>After AQ0315MSS02 Revision 1</b>							
Stationary Source PTE	934.9	557.9	123.2	123.2	<b>1,983.1</b>	3.1	<b>3,602.2</b>
Assessable Emissions	935.9	557.9	123.2	0	<b>1,983.1</b>	<b>3.1</b>	<b>3,602.2</b>
Emissions Increase <sup>2,3</sup>	0	0	0	0	<b>1,343</b>	<b>3</b>	<b>1,346</b>

Notes:

- <sup>1</sup> Totals for PTE and assessable emissions do not include PM<sub>2.5</sub> emissions to avoid double counting. PM<sub>2.5</sub> is part of PM<sub>10</sub>.
- <sup>2</sup> Note that with the issuance of Minor Permit AQ0315MSS02 Revision 1, the source’s SO<sub>2</sub> PTE reverts to the original PTE in place upon the issuance of AQ0315MSS02 before the SO<sub>2</sub> limits went into effect on June 9, 2021. The Department does not consider this permitting action to be a potential or actual emissions increase under 18 AAC 50.502(c)(3), or a potential or net emissions increase under 40 C.F.R. 52.21(b). See Part 1 of the TAR for further details
- <sup>3</sup> Note that the Department now counts individual criteria pollutant emissions below 10 tons per year as assessable emissions, which causes a 3.1 ton increase for VOC emissions.

### 6. REVISIONS TO PERMIT CONDITIONS

Table H below lists the requirements carried over from Minor Permit AQ0315MSS02 into Minor Permit AQ0315MSS02 Revision 1.

**Table H – Comparison of AQ0315MSS02 to AQ0315MSS02 Revision 1 Conditions<sup>12</sup>**

Permit AQ0315MSS02 Condition Number	Description of Requirement	Permit AQ0315MSS02 Revision 1 Condition Number	How Condition was Revised
Section 1	Emission Unit Inventory	Section 1	Removed sentence stating that emissions units in Table B do not have specific MR&R now that EU ID 8 has requirements in Condition 8.
2	Fee Requirements	2	Revised to match condition language from SPC I – Emission Fees.
3	Assessable Emissions	3	Updated the language for paying emissions “in quantities 10 tons per year or greater” to match the revision

<sup>11</sup> Background and detailed information regarding Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) can be found at <http://dec.alaska.gov/air/anpms/communities/fbks-pm2-5-serious-sip/>.

<sup>12</sup> This table does not include all standard and general conditions.

			made in 18 AAC 50.410, effective September 7, 2022. The assessable potential to emit in Condition 3.1 has been updated to the value in Table G above, to reflect this permit issuance.
4.3	Assessable Emissions Estimates	N/A	Removed condition only applicable to new sources
Section 3	FBNSB NAA SIP SO <sub>2</sub> BACT Requirements	None	The existing SO <sub>2</sub> limits whose basis stemmed from the FNSB NAA SIP were removed in their entirety because the Department has rescinded the previous SO <sub>2</sub> BACT section from this SIP and is now relying on a precursor demonstration to show that SO <sub>2</sub> controls are not needed for attaining the standard, as allowed under the PM <sub>2.5</sub> NAAQS Final SIP Requirements Rule. <sup>13</sup>
None	FNSB NAA SIP PM <sub>2.5</sub> Requirements: Emission Limits on EU IDs 4 - 7	5	Included new PM <sub>2.5</sub> requirements for EU IDs 4 through 7 from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024. <sup>14</sup> Also included MR&R requirements to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.
None	FNSB NAA SIP PM <sub>2.5</sub> Requirements: Emission Limits on EU IDs 1 and 3	6	Included new PM <sub>2.5</sub> requirements for EU IDs 1 and 3 from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024. <sup>15</sup> Also included MR&R requirements to satisfy additional SIP inclusion conditions recommended by EPA

<sup>13</sup> <https://www.gpo.gov/fdsys/pkg/FR-2016-08-24/pdf/2016-18768.pdf>.

<sup>14</sup> Background and detailed information regarding Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) Amendments public noticed on August 29, 2024 can be found at <https://dec.alaska.gov/air/anpms/sip/2024-fbks-pm2-5-serious-sip-amends/>.

<sup>15</sup> See Footnote 14.

			Region 10 in a letter dated August 23, 2024.
None	FNSB NAA SIP PM <sub>2.5</sub> Requirements: Emission Limits on EU ID 2	7	Included new PM <sub>2.5</sub> requirements for EU ID 2 from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024. <sup>16</sup> Also included MR&R requirements to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.
None	FNSB NAA SIP PM <sub>2.5</sub> Requirements: Emission Limits on EU ID 8	8	Included new PM <sub>2.5</sub> requirements for EU ID 8 from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024. <sup>17</sup> Also included MR&R requirements to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.
12.3	EE/PD Reporting Instruction	13.3	Updated condition to match language in SPC III – Excess Emissions and Permit Deviations.
N/A	Annual Compliance Certification	14	Included the annual compliance certification condition from the Department’s Title V template as new Condition 15 in order to add reporting requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.
N/A	General Source Test Requirements	Section 6	Included the general source test requirement conditions from the Department’s Title V template as new Conditions 22 through 29 in order to

<sup>16</sup> Background and detailed information regarding Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) Amendments public noticed on August 29, 2024 can be found at <https://dec.alaska.gov/air/anpms/sip/2024-fbks-pm2-5-serious-sip-amends/>.

<sup>17</sup> See Footnote 16.

			add source testing requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.
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## 7. PERMIT CONDITIONS

The bases for the standard and general conditions imposed in Minor Permit AQ0315MSS02 Revision 1 are described below.

### Cover Page

18 AAC 50.544(a)(1) requires the Department to identify the stationary source, Permittee, and contact information. The Department provided this information on the cover page of the permit. The cover page also states that the Department’s Standard Permit Condition XIII – Coal Fired Boilers (as adopted July 22, 2020) and the Department’s Default COMs Audit Procedures (as adopted August 20, 2008), have both been adopted into this minor permit.

### Section 1: Emissions Unit Inventory

The EUs authorized and/or restricted by this permit are listed in Table A of the permit. Unless otherwise noted in the permit, the information in Table A is for identification purposes only. Condition 1 is a general requirement to comply with AS 46.14 and 18 AAC 50 when installing a replacement EU.

### Section 2: Fee Requirements

18 AAC 50.544(a)(2) requires the Department to include a requirement to pay fees in accordance with 18 AAC 50.400 – 18 AAC 50.499 in each minor permit issued under 18 AAC 50.542. The Department used the Standard Permit Condition (SPC) I language for Minor Permit. However, the Department modified the condition by removing the requirement to only pay for emissions of each air pollutant in quantities of 10 tons per year or greater, to be consistent with the updates to the emission fees in 18 AAC 50.410(a) that went into effect September 7, 2022. The Department is in the process of incorporating these updates into SPC I. The Department incorporated this requirement as Condition 3.

### Section 3: State Implementation Plan (SIP) Requirements

Conditions 5 through 8 provide enforceable terms and conditions intended to satisfy the requirements from Table 7.7-43 of the Amendments to :State Air Quality Control Plan Vol. II: III.D.7.07 - Control Strategies Chapter and from the Final Chena Power Plant BACT Determination (located on PDF pages 5 through 26 of Part 2A of Amendments to Appendix III.D.7.07 Control Strategies Chapter), public notice draft date of August 19, 2024.<sup>18</sup>

Condition 5 and Table C provide the PM<sub>2.5</sub> BACT control and emissions limit identified in the FNSB NAA SIP for the coal-fired boiler EU IDs 4 through 7. This includes an emissions limit of 0.045 lb/MMBtu over a 3-hour averaging period, and the requirements to maintain good combustion practices and a full stream baghouse system at all times the EUs are in operation. The Department included a one-time source test on EU IDs 4 through 7 in Condition 5.1a to demonstrate compliance with the PM<sub>2.5</sub> emissions limit in Table C, as well as, to establish combustion settings that demonstrate compliance with the BACT PM<sub>2.5</sub> emissions limit.

<sup>18</sup> Background and detailed information regarding Fairbanks PM<sub>2.5</sub> State Implementation Plan (SIP) Amendments public noticed on August 29, 2024 can be found at <https://dec.alaska.gov/air/anpms/sip/2024-fbks-pm2-5-serious-sip-amends/>.



Condition 5.1b requires the Permittee to report the compliance status with the PM<sub>2.5</sub> emissions limit in Table C with each annual compliance certification described in Condition 15. Condition 5.1c requires the Permittee to operate the EU with fabric filters and maintain good combustion practices at all times of operation. The condition also requires the Permittee to perform regular maintenance according to the manufacturer's and the operator's maintenance procedures and keep records of the maintenance performed. The Department included additional reporting beyond Standard Permit Condition 6 – Good Air pollution Control, in order to satisfy additional SIP requirements requested by EPA. Condition 5.1d requires the Permittee to monitor visible emissions to ensure compliance with the State Visible Emissions Standard in Table C using a Continuous Opacity Monitoring System (COMS) and Condition 5.1e(ii) requires reporting of the highest 6-minute average opacity.

Conditions 6 through 8 and Table D, Table E, and Table F provide the PM<sub>2.5</sub> BACT control and emissions limit identified in the FNSB NAA SIP for the material handling EU IDs 1, 2, 3, and 8. For EU ID 1, this includes an emissions limit of 0.34 tpy, and the requirements to follow the fugitive dust plan and maintain a partial enclosure in accordance with manufacturer's and operator's requirements and procedures. For EU ID 2, this includes an emissions limit of 0.14 tpy, and the requirement to follow the fugitive dust plan. For EU ID 3, this includes an emissions limit of 0.23 tpy, and the requirements to follow best management practices, maintain partial and full enclosures, as well as a fabric filter system in accordance with manufacturer's and operator's requirements and procedures. For EU ID 8, this includes an emissions limit of 0.34 tpy, and the requirements to maintain a full enclosure during all ash loadout operations.

#### **Section 4: General Recordkeeping, Reporting, and Certification Requirements**

##### **Condition 9, Recordkeeping Requirements**

The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide an evidence of compliance with this requirement.

##### **Condition 10, Certification**

18 AAC 50.205 requires the Permittee to certify any permit application, report, affirmation, or compliance certification submitted to the Department. This requirement is reiterated as a standard permit condition in 18 AAC 50.345(j). Minor Permit AQ0315MSS02 Revision 1 uses the standard condition language, but also expands it by allowing the Permittee to provide electronic signatures.

##### **Condition 11, Submittals**

Condition 11 clarifies where the Permittee should send their reports, certifications, and other submittals required by the permit. The Department used the language in SPC XVII. The Department included this condition from a practical perspective rather than a regulatory obligation.

##### **Condition 12, Information Requests**

AS 46.14.020(b) allows the Department to obtain a wide variety of emissions, design and operational information from the owner and operator of a stationary source. This statutory provision is reiterated as a standard permit condition in 18 AAC 50.345(i). The Department used the standard language in Minor Permit AQ0315MSS02 Rev. 1.

##### **Condition 13 and Section 7, Excess Emission and Permit Deviation Reports and Notification Form**

This Condition reiterates the notification requirements in 18 AAC 50.235(a)(2) and 18 AAC 50.240 regarding unavoidable emergencies, malfunctions, and excess emissions. Also, the Permittee is



required to notify the Department when emissions or operations deviate from the requirements of the permit. The Department used the language in SPCs III and IV, except as follows:

The Department has modified Condition 13.3 and the Notification Form in Section 7 to reflect the electronic submittal requirements in 18 AAC 50.270 using the Department’s online form to submit notification of excess emissions and permit deviations beginning September 7, 2023. The electronic notification form is found at the Division of Air Quality’s Air Online Services (AOS) system webpage <http://dec.alaska.gov/applications/air/airtoolsweb> using the Permittee Portal option. Submittal through other methods may be allowed only upon written Department approval. Beyond as noted, the Department has determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3).

The Department included Condition 13 in order to add reporting requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.

### **Condition 14, Operating Reports**

The Department mostly used the SPC VII language for the operating report condition. However, the Department modified or eliminated the Title V only aspects in order to make the language applicable for a minor permit. The Department included Condition 14 in order to add reporting requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.

### **Condition 15, Annual Compliance Certification**

This condition specifies the periodic compliance certification requirements and specifies a due date for the annual compliance certification. No format is specified. The Permittee may provide one report certifying compliance with each permit term or condition for each of the effective permits during the certification period, or may choose to provide two reports: one certifying compliance with permit terms and conditions from January 1 until the date of expiration of the old permit, and a second report certifying compliance with terms and conditions in effect from the effective date of the renewal permit until December 31.

The Permittee is required to submit to the Department an annual compliance certification report. The Permittee may submit the required report electronically at their discretion.

The Department included Condition 15 in order to add reporting requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024

## **Section 5: Standard Permit Conditions**

### **Conditions 16 – 21, Standard Permit Conditions**

18 AAC 50.544(a)(5) requires each minor permit issued under 18 AAC 50.542 to contain the standard permit conditions in 18 AAC 50.345, as applicable. 18 AAC 50.345(a) clarifies that subparts (c)(1) and (2), and (d) through (o), may be applicable for a minor permit. The Department included subparts (c)(1) and (2) as Condition 16 and subparts (d) through (h) as Conditions 17 through 21.

## **Section 6: General Source Test Requirements**

AS 46.14.180 states that monitoring requirements must be, “based on test methods, analytical procedures, and statistical conventions approved by the federal administrator or the department or otherwise generally accepted as scientifically competent.” The Department incorporated this requirement as follows:

- Condition 23 requires the Permittee to conduct their source tests under conditions that reflects the actual discharge to ambient air; and
- Condition 24 requires the Permittee to use specific EPA reference methods when conducting a source test.

Section 6 also includes the previously discussed standard conditions for source testing.

The Department included Section 6 in order to add source testing requirements into the minor permit to satisfy additional SIP inclusion conditions recommended by EPA Region 10 in a letter dated August 23, 2024.

## **8. PERMIT ADMINISTRATION**

Minor Permit AQ0315MSS02 Rev. 1 does not contradict conditions in the Title V Operating Permit AQ0315TVP04 Rev. 2 issued to Aurora Energy, LLC for the Chena Power Plant. Therefore, Aurora Energy, LLC may operate under the terms and conditions of Minor Permit AQ0315MSS02 Revision 1 upon issuance of the permit.