

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ1121MSS04 Revision 1 **Preliminary Date – September 23, 2024**
Rescinds Permit: AQ1121MSS04

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ1121MSS04 Revision 1 to the Permittee listed below.

Permittee: Doyon Utilities, LLC
P.O. Box 74040, Fairbanks, AK 99707-4040

Stationary Source: Fort Wainwright (Privatized Emission Units)

Location: 64° 50' 00" North; 147° 35' 00" West

Project: PM_{2.5} Serious Nonattainment State Implementation Plan (SIP)

Permit Contact: Isaac Jackson, (907) 455-1547, ijackson@doyonutilities.com

The Permittee submitted an application for Minor Permit AQ1121MSS04 under AS 46.14.130(c)(2) because the Department finds that public health or air quality effects provide a reasonable basis to regulate the stationary source. This finding is contained in the State Air Quality Control Plan adopted on November 19, 2019.

With the issuance of AQ1121MSS04 Revision 1, the Department finds that public health or air quality effects still provide a reasonable basis to regulate the stationary source under AS 46.14.130(c)(2). This finding is contained in the State Air Quality Control Plan adopted on November 19, 2019, for the PM_{2.5} Serious Nonattainment area.

This permit satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this permit.

The Department's Standard Permit Condition XIII – Coal Fired Boilers (as adopted July 22, 2020), as well as the Department's Default COMs Audit Procedures (as adopted August 20, 2008), have been adopted into this minor permit.

James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

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

Section 1 Emissions Unit Inventory

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

Table 1 – EU Inventory

EU #	EU Description	Make/Model	Fuel	Rating/Max Capacity	Installation Date
1	Coal-Fired Boiler 3	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
2	Coal-Fired Boiler 4	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
3	Coal-Fired Boiler 5	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
4	Coal-Fired Boiler 6	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
5	Coal-Fired Boiler 7	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
6	Coal-Fired Boiler 8	Wickes Boiler Company	Coal	230 MMBtu/hr	1953
7A	South Coal Handling Dust Collector (DC-01)	Airlanco 169-AST-8	N/A	13,150 acfm	2001
7B	South Underbunker Dust Collector (DC-02)	Airlanco 19-AST	N/A	884 acfm	2005
7C	North Coal Handling Dust Collector (NDC-1)	Dustex C67-10-547	Distillate	9,250 acfm	2004
8	Backup Generator Engine	Caterpillar 3516C	Distillate	2,937 hp	2009
9	Emergency Generator Engine	Detroit 6V92	Distillate	353 hp	1988
14	Emergency Generator Engine	Cummins QSL-G2 NR3	Distillate	320 hp	2008
22	Emergency Generator Engine	Cummins	Distillate	35 hp	1989
23	Emergency Generator Engine	John Deere 6068HF150	Distillate	155 hp	2003
29A	Emergency Generator Engine	Detroit Diesel 5116493	Distillate	74 hp	2014
30A	Emergency Pump Engine	Caterpillar C4.4 LC60	Distillate	80 hp ¹	2018
31A	Emergency Generator Engine	Detroit Diesel 4045TF290	Distillate	74 hp	2014
32A	Emergency Pump Engine	Caterpillar C4.4 LC60	Distillate	80 hp ¹	2018
33A	Emergency Pump Engine	Caterpillar C4.4	Distillate	75 hp	2015
34	Emergency Pump Engine	Detroit Diesel 10447000	Distillate	220 hp	1995
35	Emergency Pump Engine	John Deere 4045DF-120	Distillate	55 hp	2009
36A	Emergency Pump Engine	Caterpillar C4.4	Distillate	161 hp	2024
37A	Emergency Pump Engine	Caterpillar C4.4	Distillate	75 hp	2015
51A	Fly Ash Dust Collector (DC-1)	United Conveyor Corp. 32242	N/A	3,620 acfm	1993
51B	Bottom Ash Dust Collector (DC-2)	United Conveyor Corp. 32242	N/A	3,620 acfm	1994
52	Coal Storage Pile	CHPP	N/A	84,676 tpy	Unknown

Notes:

1. Listed as 91 hp in 2023 NEI.

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

Section 2 *Fee Requirements*

2. **Fee Requirements.** The Permittee shall pay to the Department all assessed permit fees. Fee rates are set out in 18 AAC 50.400 – 499.

3. **Assessable Emissions.** For each period from July 1 through the following June 30, the Permittee shall pay to the Department annual emission fees based on the stationary source’s assessable emissions as determined by the Department under 18 AAC 50.410. The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit. The quantity for which fees will be assessed is the lesser of the stationary source’s
 - 3.1 potential to emit of 4,148.32 TPY; or
 - 3.2 projected annual rate of emissions, in TPY, based upon actual annual emissions for the most recent calendar year, or another 12-month period approved in writing by the Department, when demonstrated by credible evidence of actual emissions, based upon the most representative information available from one or more of the following methods:
 - a. an enforceable test method described in 18 AAC 50.220;
 - b. material balance calculations;
 - c. emission factors from EPA’s publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
 - d. other methods and calculations approved by the Department, including appropriate vendor-provided emissions factors when sufficient documentation is provided.

4. **Assessable Emission Estimates.** The Permittee shall comply as follows:
 - 4.1 No later than March 31 of each year, the Permittee may submit an estimate of the stationary source’s assessable emissions as determined in Condition 3.2. Submit actual emissions estimates in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-i-submission-instructions/>.
 - 4.2 The Permittee shall include with the assessable emissions report all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.
 - 4.3 If no estimate or waiver letter is submitted on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit in Condition 3.1.

Section 3 State Implementation Plan (SIP) Requirements

Fairbanks PM_{2.5} Serious Nonattainment Area SIP Requirements

5. **Coal Boilers Emissions Limit.** The Permittee shall limit the emissions from the coal boilers (EU IDs 1 through 6) as specified in Table 2.

Table 2 - EU IDs 1 through 6 SIP BACT Limits

Pollutant	BACT Control	Fuel Type	BACT Emissions Limit
PM _{2.5}	Good Combustion Practices and Full Stream Baghouse System	Coal	0.045 lb/MMBtu (3-hour average) and State Visible Emissions Standard 18 AAC 50.055(a)(9)

- 5.1 For EU IDs 1 through 6, the Permittee shall:
- a. Conduct a one-time source test on any two of EU IDs 1 through 6, after the control device, in accordance with Section 6, within 180 days of permit issuance, or by June of the year following the date of permit issuance, whichever comes later, to demonstrate compliance with the PM_{2.5} emissions limit listed in Table 2.
 - (i) Conduct the source test at the maximum achievable load on any two of EU IDs 1 through 6 using EPA Methods 201A and 202.
 - (ii) Emission results shall be reported as the arithmetic 3-hour average of all valid test runs and shall be in units of lb/MMBtu.
 - (iii) The Permittee shall report the results of the source test in accordance with Condition 27.
 - (iv) Include a summary of the source test results in the next operating report that is due after the submittal date of the source test report in accordance with Condition 12.
 - b. Report compliance status with the PM_{2.5} emissions limit in Table 2 in each annual compliance certification in accordance with Condition 13.
 - c. Operate the EU with fabric filters and maintain good combustion practices at all times of operation.
 - (i) Keep records of the date and time identifying each time-period that an EU is operated without a fabric filter.
 - (ii) Perform regular maintenance according to the manufacturer's and the operator's maintenance requirements and procedures.

- (iii) Keep records of any maintenance that would have a significant effect on emissions. The records may be kept in electronic format.
 - (iv) Keep a copy of the manufacturer’s and the operator’s maintenance procedures.
 - (v) Operate the EU consistent with manufacturer’s recommended combustion settings (e.g., maximum CO, excess air in flue gas, and other relevant parameters) or those established during the source test conducted to demonstrate compliance with the BACT emissions limit in Table 2.
- d. Monitor visible emissions to ensure compliance with the State Visible Emissions Standard in Table 2 using a Continuous Monitoring System (COMS).
- (i) The Permittee shall demonstrate compliance with Condition 5.1d by following the Department’s Standard Permit Condition XIII – Coal Fired Boilers (as adopted July 22, 2020), as well as the Department’s Default COMs Audit Procedures (as adopted August 20, 2008), both of which are available on the following website: <https://dec.alaska.gov/air/air-permit/standard-conditions/>.
- e. Report in accordance with Condition 12
- (i) a summary of the maintenance records collected under Condition 5.1c(iii); and
 - (ii) the highest 6-minute average opacity measured by the COMs during the reporting period under Condition 5.1d.
- f. Report in accordance with Condition 11, whenever
- (i) an emissions rate determined by the source test required by Condition 5.1a exceeds the limit in Table 2;
 - (ii) a boiler is operated without a fabric filter as recorded in Condition 5.1c(i); or
 - (iii) any of Conditions 5.1a through 5.1e are not met.

6. Large Diesel-Fired Engines Emissions Limit. The Permittee shall limit the emissions from the diesel-fired engine (EU ID 8) as specified in Table 3.

Table 3 - EU ID 8 SIP BACT Limits

Pollutant	BACT Control	Fuel Type	BACT Emissions Limit
PM _{2.5}	Good Combustion Practices, Combust only ULSD, and Limited Operations	ULSD	0.15 g/hp-hr

6.1 For EU ID 8, the Permittee shall demonstrate compliance with the PM_{2.5} BACT emissions limits in Table 3 as follows:

- a. Maintain good combustion practices at all times that EU ID 8 is in operation.
 - (i) Perform regular maintenance according to the manufacturer's and the operator's maintenance procedures.
 - (ii) Keep records of any maintenance that would have a significant effect on emissions. The records may be kept in electronic format.
 - (iii) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
 - b. Limit EU ID 8 to 500 hours of operation per 12-month rolling period.
 - (i) The Permittee shall record the date, time, and duration for each operation of EU ID 8.
 - (ii) By the end of each calendar month, record the total operating hours of the EU
 - (A) For the previous calendar month, and
 - (B) For the previous 12 consecutive months, as calculated using the records obtained under Condition 6.1b(ii)(A).
 - c. Combust only ULSD fuel (limit of 15 ppmw). Monitor, record, and report as follows:
 - (i) For each shipment of fuel, keep receipts that specify fuel grade and amount.
 - d. Report compliance status with the PM_{2.5} emissions limit in Table 3 in each annual compliance certification in accordance with Condition 13.
 - e. Report in accordance with Condition 12
 - (i) A summary of the maintenance records collected under Condition 6.1a(ii);
 - (ii) the operating hour records for each engine collected under Condition 6.1b(ii)(B); and
 - (iii) the fuel receipt records required by Condition 6.1c(i).
 - f. Report in accordance with Condition 11, whenever
 - (i) an emissions rate exceeds the limit in Table 3; or
 - (ii) any of Conditions 6.1a through 6.1e are not met.
7. **Small Diesel-Fired Engines Emissions Limit.** The Permittee shall limit the emissions from the small diesel-fired engines (EU IDs 9, 14, 22, 23, 29a – 33a, 34, 35, 36a, and 37a) as specified in Table 4.

Table 4 - EU IDs 9, 14, 22, 23, 29a - 33a, 34, 35, 36a, and 37a SIP BACT Limits

Pollutant	BACT Control	Fuel Type	BACT Emissions Limit
PM _{2.5}	Good Combustion Practices, Combust only USLD, and Limited Operations	ULSD	EU IDs 9, 22, 23, 34, and 36a
			0.0022 lb/hp-hr
			EU ID 14
			0.2 g/kW-hr
			EU IDs 29a – 33a, 35, and 37a
			0.3 g/hp-hr

- 7.1 For EU IDs 9, 14, 22, 23, 29a – 33a, 34, 35, 36a, and 37a, the Permittee shall demonstrate compliance with the PM_{2.5} BACT emissions limit contained in Table 4 as follows:
- a. Maintain good combustion practices at all times that EU IDs 9, 14, 22, 23, 29a – 33a, 34, 35, 36a, and 37a are in operation.
 - (i) Perform regular maintenance considering the manufacturer’s or the operator’s maintenance procedures;
 - (ii) Keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
 - (iii) Keep a copy of either the manufacturer’s or the operator’s maintenance procedures.
 - b. Limit the maintenance checks, readiness testing, and non-emergency operation of each EU to 100 hours per calendar year.
 - (i) For each of EU IDs 9, 14, 22, 23, 29a – 33a, 34, 35, 36a, and 37a, monitor and record as follows:
 - (A) Maintain and operate a non-resettable hour meter, capable of recording the total hours of operation.
 - (B) By the end of each calendar month, record the total operating hours of the EU
 - (1) for the previous calendar month; and
 - (2) for the previous 12 consecutive months, as calculated using the records obtained under Condition 7.1b(i)(B)(1).

- c. Combust only ULSD fuel (limit of 15 ppmw). Monitor, record, and report as follows:
 - (i) For each shipment of fuel, keep receipts that specify fuel grade and amount.
- d. Report compliance status with the PM_{2.5} emissions limit in Table 4 in each annual compliance certification in accordance with Condition 13.
- e. Report in accordance with Condition 12
 - (i) a summary of the maintenance records collected under Condition 7.1a(ii);
 - (ii) the operating hour records for each engine collected under Condition 7.1b(i)(B)(2); and
 - (iii) the fuel receipt records required by Condition 7.1c(i).
- f. Report in accordance with Condition 11, whenever
 - (i) an emissions rate exceeds the limit in Table 4; or
 - (ii) if any of Conditions 7.1a through 7.1e are not met.

8. Material Handling Equipment Emissions Limit. The Permittee shall limit the emissions from the dust collectors (EU IDs 7a, 7b, 7c, 51a, and 51b) and the emergency coal storage pile as specified in Table 5.

Table 5 - EU IDs 7a, 7b, 7c, 51a, 51b, and 52 SIP BACT Limits

Pollutant	BACT Control	Fuel Type	BACT Emissions Limit
PM _{2.5}	Dust Collectors and Enclosed Coal/Ash Handling Systems	N/A	EU ID 7a
			0.0025 gr/dscf
			EU ID 7b, 7c, 51a, & 51b
	0.02 gr/dscf		
	Chemical Stabilizers, Wind Fencing, Covered Haul Vehicles, Watering, and Wind Awareness		EU ID 52
			1.42 tons per year

8.1 For EU IDs 7a, 7b, 7c, 51a, and 51b, the Permittee shall demonstrate compliance with the PM_{2.5} BACT emissions limit contained in Table 5 as follows:

- a. Submit an initial compliance certification indicating that coal/ash handling and conveying systems are enclosed in the next operating report that is due after the submittal date of the source test report in accordance with Condition 12.
 - (i) Keep records of the date and time identifying each time period that any of EU IDs 7a, 7b, 7c, 51a, or 51b are operated outside a required enclosure.
 - b. Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures.
 - (i) Keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
 - (ii) Keep a copy of either the manufacturer's or the operator's maintenance procedures.
 - c. Monitor that door(s) and access panels to coal/ash handling and conveying systems are closed while in operation.
 - d. Monitor the following:
 - (i) EU ID 7a is operating at all times when the South Coal Handling system is in operation.
 - (ii) EU ID 7b is operating at all times when the South Under Bunker Flight Conveyor system is in operation.
 - (iii) EU ID 7c is operating at all times when the North Coal Handling system is in operation.
 - e. For EU IDs 51a and 51b, comply with the following:
 - (i) Monitor that EU IDs 51a and 51b are operating at all times fly and bottom ash is conveyed to truck loading locations.
 - (ii) Monitor that overhead door(s) at ash loading building are closed while loading trucks.
 - (iii) Monitor that ash truck bodies are free of ash before they leave the building, and that their loads are tarped before they leave the building area
 - (iv) Monitor the implementation of a fugitive dust control program that includes provisions to minimize fugitive dust from coal ash handling operations.
- 8.2 For EU ID 52, the Permittee shall demonstrate compliance with the PM_{2.5} BACT emissions limit contained in Table 5 as follows:
- a. Maintain and comply with the Permittee's Fugitive Dust Control Plan.
 - (i) If requested by the Department, the Permittee will submit a revised plan that corrects any deficiencies raised by the Department.
 - (ii) The Permittee shall keep records of

- (A) complaints received by the Permittee and complaints received by the Department and conveyed to the Permittee; and
 - (B) any additional precautions that are taken
 - (1) to address complaints described in Condition 8.2a(ii) or to address the results of Department inspections that found potential problems; and
 - (2) to prevent future dust problems.
 - b. Monitor that chemical stabilizers are used to control fugitive dust on dirt roads as necessary.
 - c. Monitor that wind fencing is in place around coal piles, where appropriate.
- 8.3 Report compliance status with the PM_{2.5} emissions limit in Table 5 in each annual compliance certification in accordance with Condition 13.
- 8.4 Report in accordance with Condition 12
- a. a summary of the maintenance records collected under Condition 8.1b(i);
 - b. any summary of any complaints received by the Permittee under Condition 8.2a(ii)(A); and
 - c. a summary of the measures used to demonstrate compliance with Conditions 8.2b and 8.2c.
- 8.5 Report in accordance with Condition 11, whenever
- a. an EU is operated outside of an enclosure as recorded in Condition 8.1a(i);
 - b. an EU is operated without the associated dust collector as monitored under Condition 8.1d;
 - c. a requirement in Condition 8.1e is not met; and
 - d. if any of Conditions 8.1 through 8.4 are not met.

Section 4 Recordkeeping, Reporting, and Certification Requirements

9. **Certification.** The Permittee shall certify any permit application, report, affirmation, or compliance certification submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: *“Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.”* Excess emissions reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.
- 9.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if the person providing the electronic signature
- a. uses a security procedure, as defined in AS 09.80.190, that the Department has approved; and
 - b. accepts or agrees to be bound by an electronic record executed or adopted with that signature.
10. **Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit to the Department one certified copy of reports, compliance certifications, and/or other submittals required by this permit. The Permittee may submit the documents electronically or by hard copy.
- 10.1 Submit the certified copy of reports, compliance certifications, and/or other submittals in accordance with the submission instructions on the Department’s Standard Permit Conditions web page at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/>.
11. **Excess Emissions and Permit Deviation Reports.** The Permittee shall report excess emissions and permit deviations as follows:
- 11.1 **Excess Emissions Reporting.** The Permittee shall report all emissions or operations that exceed emissions standards or limits of this permit as follows:
- a. In accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report
 - (i) excess emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable.
 - b. In accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology-based emissions standard.

- c. If a continuous or recurring excess emissions is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 11.1d.
- d. Report all other excess emissions not described in Conditions 11.1a, 11.1b, and 11.1c within 30 days after the end of the month during which the excess emissions occurred or as part of the next routine operating report in Condition 12 for excess emissions that occurred during the period covered by the report, whichever is sooner.
- e. If requested by the Department, the Permittee shall provide a more detailed written report to follow up on an excess emissions report.

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

- a. Report all other permit deviations within 30 days after the end of the month during which the deviation occurred or as part of the next routine operating report in Condition 12 for permit deviations that occurred during the period covered by the report, whichever is sooner.

11.3 **Reporting Instructions.** When reporting either excess emissions or permit deviations, the Permittee shall report using either the Department’s online form, which can be 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, or, if the Permittee prefers, the form contained in Section 8 of this permit. The Permittee must provide all information called for by the form that is used. Submit the report in accordance with the submission instructions on the Department’s Standard Permit Conditions webpage found at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.

12. **Operating Reports.** During the life of this permit¹, the Permittee shall submit to the Department an operating report in accordance with Conditions 9 and 10 by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.

12.1 The operating report must include all information required to be in operating reports by other conditions of this permit, for the period covered by the report.

12.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 12.1, the Permittee shall identify

- a. the date of the excess emissions or permit deviation;
- b. the equipment involved;
- c. the permit condition affected;

¹ *Life of this permit* is defined as the permit effective dates, including any periods of reporting obligations that extend beyond the permit effective dates. For example, if a permit expires prior to the end of a calendar year, there is still a reporting obligation to provide operating reports for the periods when the permit was in effect.

- d. a description of the excess emissions or permit deviation; and
- e. any corrective action or preventive measures taken and the date(s) of such actions; or

12.3 when excess emissions or permit deviation reports have already been reported under Condition 11 during the period covered by the operating report, the Permittee shall either

- a. include a copy of those excess emissions or permit deviation reports with the operating report; or
- b. cite the date(s) of those reports.

13. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the Department an annual compliance certification report according to Condition 9.

13.1 Certify the compliance status of the stationary source over the preceding calendar year consistent with the monitoring required by this permit, as follows:

- a. identify each term or condition set forth in Section 2 through Section 6, that is the basis of the certification;
- b. briefly describe each method used to determine the compliance status;
- c. state whether compliance is intermittent or continuous; and
- d. identify each deviation and take it into account in the compliance certification.

13.2 In addition, submit a copy of the report directly to the Clean Air Act Compliance Manager, US EPA Region 10, ATTN: Air Toxics and Enforcement Section, Mail Stop: 20-C04, 1200 Sixth Avenue, Suite 155, Seattle, WA 98101-3188.

Section 5 *Standard Permit Conditions*

14. The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for
 - 14.1 an enforcement action; or
 - 14.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
15. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
16. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
17. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
18. The permit does not convey any property rights of any sort, nor any exclusive privilege.
19. The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to
 - 19.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 19.2 have access to and copy any records required by this permit;
 - 19.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 19.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 6 General Source Test Requirements

- 20. Requested Source Tests.** In addition to any source testing explicitly required by this permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.
- 21. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
 - 21.1 at a point or points that characterize the actual discharge into the ambient air; and
 - 21.2 at the maximum rated burning or operating capacity of the emissions unit or another rate determined by the Department to characterize the actual discharge into the ambient air.
- 22. Reference Test Methods.** The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:
 - 22.1 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in 40 C.F.R. 60, Appendix A, Reference Method 9. The Permittee may use the form in Attachment 1 of this permit to record data.
 - 22.2 Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.
 - 22.3 Source testing for emissions of PM₁₀ and PM_{2.5} must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Methods 201 or 201A and 202.
 - 22.4 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.
- 23. Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific emissions unit type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).
- 24. Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.
- 25. Test Plans.** Before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the emissions unit will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under Condition 20 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.

- 26. Test Notification.** At least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and time the source test will begin.
- 27. Test Reports.** Within 60 days after completing a source test, the Permittee shall submit one certified copy of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in Condition 9. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.

Section 7 *Permit Documentation*

Date

July 30, 2024

Document Details

Department sent Doyon Utilities, LLC a Notice of Intent to Revoke and Reissue Minor Permit AQ1121MSS04

Section 8 Notification Form²

Fort Wainwright (Privatized Emission Units)

Stationary Source Name

AQ1121MSS04 Revision 1

Air Quality Permit Number

Doyon Utilities, LLC

Company Name

When did you discover the Excess Emissions/Permit Deviation?

Date: ____ / ____ / ____

Time: ____ : ____

When did the event/deviation occur?

Begin: Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock)

End: Date: ____ / ____ / ____

Time: ____ : ____ (please use 24-hr clock)

What was the duration of the event/deviation? ____ : ____ (hrs:min) or ____ days

(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for Notification (Please check only 1 box and go to the corresponding section.):

Excess Emissions - Complete Section 1 and Certify

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

Deviation from Permit Conditions - Complete Section 2 and Certify

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

Deviation from COBC³, CO⁴, or Settlement Agreement - Complete Section 2 and Certify

² Revised as of July 22, 2020.

³ Compliance Order By Consent

⁴ Compliance Order

Section 1. Excess Emissions

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

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

- | | |
|--|--|
| <input type="checkbox"/> Start Up/Shut Down | <input type="checkbox"/> Natural Cause (weather/earthquake/flood) |
| <input type="checkbox"/> Control Equipment Failure | <input type="checkbox"/> Scheduled Maintenance/Equipment Adjustments |
| <input type="checkbox"/> Bad fuel/coal/gas | <input type="checkbox"/> Upset Condition |
| <input type="checkbox"/> Other _____ | |

(c) **Description**

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance. Attach supporting information if necessary.

(d) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the permit. Identify each emission standard potentially exceeded during the event and the exceedance.

EU ID	EU Name	Permit Condition Exceeded/Limit/Potential Exceedance

(e) **Type of Incident:** (Please check all that apply and provide the value requested, if any):

Opacity ____%

Venting ____ (gas/scf)

Control Equipment Down

Fugitive Emissions

Emission Limit Exceeded

Marine Vessel Opacity

Flaring

Other: _____

(f) Corrective Actions:

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

(g) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable? YES NO

Do you intend to assert the affirmative defense of 18 AAC 50.235? YES NO

Certify Report (go to end of form)

Section 2. Permit Deviations

(a) **Permit Deviation Type:** (Check all boxes that apply per event. Complete a separate form for each event, as applicable.)

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

(b) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the permit. List the corresponding permit condition and the deviation.

EU ID	EU Name	Permit Condition /Potential Deviation

(c) **Description of Potential Deviation:**

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation. Attach supporting information if necessary.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence. Attach supporting information if necessary.

Certification:

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

Printed Name: _____ Title _____ Date _____

Signature: _____ Phone number _____

NOTE: *This document must be certified in accordance with 18 AAC 50.345(j). Read and sign the certification in the bottom of the form above. (See Condition 9.)*

Beginning September 7, 2023, Excess Emissions and Permit Deviations must be submitted through the AOS Permittee Portal at <http://dec.alaska.gov/applications/air/airtoolsweb/>.

This Notification Form may only be used to satisfy the reporting requirements if the Department has approved alternative reporting options in writing prior to submittal.

[18 AAC 50.346(b)(3)]