

**DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OWNER REQUESTED LIMIT**

Owner Requested Limit: AQ1513ORL02
Rescinds ORL: AQ1513ORL01

Draft Date – December 31, 2024

Owner/Operator: Alaska Power & Telephone Co.
136 Misty Marie Lane, Ketchikan, AK 99901

Stationary Source: Klawock Power Generation Station

Location: 6698 Klawock-Hollis Highway, Klawock, AK 99925

Project: Additional Backup Unit

ORL Contact: Butch Bickler 907-755-4822 ext 4126
butch.b@aptalaska.com

The above-named owner/operator has submitted a complete request for an owner requested limit (ORL) under 18 AAC 50.225(b) for the Klawock Power Generation Station. The Alaska Department of Environmental Conservation (Department) approves the ORL to restrict the stationary source’s potential to emit (PTE). The ORL allows Alaska Power & Telephone Co. to avoid the requirements for a Title V operating permit and Minor Permit. The Department certifies that the ORL is effective as of the date noted below.

In accordance with 18 AAC 50.225(f), the owner/operator has agreed to the conditions listed in this ORL.

The owner/operator may revise the terms or conditions of this approval under 18 AAC 50.225 (h)(1) by submitting a request under 18 AAC 50.225(b). The owner/operator may request the Department revoke the limit in accordance with 18 AAC 50.225(h)(2). This limit remains in effect until the Department approves a new limit or revokes it.

I understand and agree to the terms and conditions of this approval.

Owner or Operator

Printed Name

Title

Department approval:

**James R. Plosay, Program Manager
Air Permit Program**

Owner Requested Limit Effective Date

CONDITIONS:

1. **Owner Requested Limit to keep nitrogen oxide (NO_x) emissions below 40 tons per year (tpy).** The owner/operator shall limit the individual total kilowatt-hours (kWh) produced by emission units (EUs) 8 and 10 listed in Table 1 to less than 2,474,000 kWh and 955,000 kWh, respectively, in any consecutive 12-month period. Monitor, record, and report as follows:
 - 1.1 Install, maintain, and operate in good working order a non-resettable kWh meter on each EU 8 and 10, accurate to within ± 5 percent, for monitoring the kWh produced by EUs 8 and 10.
 - 1.2 Monitor and record the total kWh produced by each EU 8 and 10, by the end of each calendar month for the previous month.
 - 1.3 Calculate and record, for each EU listed in Condition 1.2, the sum of the last 12 consecutive records obtained in accordance with Condition 1.2, by the end of each calendar month.
 - 1.4 Report in the operating report as described in Condition 2 the records obtained in accordance with Condition 1.3.
 - 1.5 If total kilowatt-hours exceed any of the limits in Condition 1, report as excess emissions and deviation as specified in Condition 4.
2. **Recordkeeping Requirements.** Unless otherwise specified in this authorization, keep all records required by this ORL for at least five years from the date of collection.
3. **Annual Operating Reports.** Submit one certified copy, of an **annual operating report** for the stationary source to the Department, in accordance with the submission instructions on the Department's Standard Permit Conditions web page <https://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/> by February 1 for the preceding calendar year. Certify the report as specified in 18 AAC 50.205 by having the responsible official sign after the following 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.*" Attach copies of all excess emission and deviation forms submitted to Department during the reporting period pursuant to Condition 4.
4. **Excess Emissions and Deviation Reports.** Report excess emissions and deviations as follows:
 - 4.1 **Excess Emissions Reporting.** Report all emissions or operations that exceed emissions limits of this ORL as follows:
 - a. In accordance with 18 AAC 50.240(c), as soon as possible report:
 - (i) excess emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions believed to be unavoidable.

- b. If a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 4.1c.
 - c. Report all other excess emissions not described in Conditions 4.1a and 4.1b within 30 days after the end of the month during which the excess emissions occurred or as part of the next annual operating report in Condition 3, whichever is sooner.
 - d. If requested by the Department, provide a more detailed written report as requested to follow up an excess emissions report.
- 4.2 **Deviations Reporting.** For deviations that are not “excess emissions,” as defined in 18 AAC 50.990, report within 30 days after the end of the month during which the deviation occurred or as part of the next annual operating report in Condition 3, whichever is sooner.
- 4.3 **Reporting Instructions.** When reporting either excess emissions or deviations, the Permittee shall report using the Department’s online form for all such submittals, beginning no later than September 7, 2023. The form 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. Alternatively, upon written Department approval, the Permittee may submit the form contained in Attachment A to this permit. The Permittee must provide all information called for by the form that is used. Submit the report in accordance with the submission instructions on the Department’s Standard Permit Conditions webpage found at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.

Statement of Avoided Requirement:

The Klawock Power Generation Station is an existing stationary source located in Klawock, Alaska. The Department has previously authorized the owner/operator an approval to operate the stationary source under owner requested limit (ORL) AQ1513ORL01 issued on June 5, 2018. This ORL rescinds AQ1513ORL01 in accordance with the provisions of 18 AAC 50.225(h).

AQ1513ORL02 preserves the existing PTE from AQ1513ORL01 to less than 40 TPY for NO_x, thereby avoiding the requirements for a minor permit under 18 AAC 50.502(c). The ORL requirements also ensures that no other pollutant exceeds the thresholds for a minor permit.

Consistent with the definition of “potential to emit” listed in AS 46.14.990(22), the capacity of the stationary source to emit an air pollutant is verifiable through the monitoring, recordkeeping, and reporting contained in this approval. By limiting the potential to emit of EUs 8 and 10 the owner/operator is avoiding the requirement to obtain a minor permit under 18 AAC 50.502(c)(1) and AS 46.14.130(c) and avoiding the requirement to obtain an operating permit under 18 AAC 50.326 and AS 46.14.130(b).

Table 1 – EU inventory subject to limits

EU ID	Unit Name	Unit Description	Model Date	Nominal Rating/Size
8	Diesel Generator	Caterpillar 3516B	2000	2,000 kW
10	Diesel Generator	Caterpillar 3516 DITA	2001	1,785 kW

Table 2 presents details of the EUs, their characteristics, and emissions. Potential emissions are estimated using maximum annual operation for all fuel burning equipment as defined in 18 AAC 50.990(39) subject to any operating limits.

Table 2 – Emissions Summary, in Tons per Year (TPY)

EU ID	Unit ID/ Description	Maximum Rating or Capacity (kW)	Operating Limits (kWh/yr)	NO _x		CO		VOC		PM _{2.5} / PM ₁₀		SO ₂
				EF (lb/kWh)	PTE (tpy)	EF (lb/kWh)	PTE (tpy)	EF (lb/kWh)	PTE (tpy)	EF (lb/kWh)	PTE (tpy)	PTE (tpy)
8	Diesel Genset	2,000	2,474,000	0.0194	24.00	0.0035	4.30	0.00043	0.53	0.00056	0.69	0.019
10	Diesel Genset	1,785	955,000	0.0335	16.00	0.0092	4.41	0.00033	0.16	0.00065	0.31	0.007
Total Potential to Emit					40.00		8.71		0.69		1.00	0.03

Table Notes:

EU 8 NO_x, CO, VOC, & PM emission factors taken from manufacturer performance data, potential site variation, converted from lb/hr to lb/kWh using 2,000 kW/hr.

EU 10 NO_x, CO, VOC, & PM emission factors taken from manufacturer performance data, potential site variation, converted from lb/hr to lb/kWh using 1,785 kW/hr.

VOC conservatively assumed to equal total hydrocarbons (HC).

PM₁₀ and PM_{2.5} conservatively assumed to equal total particulates.

SO₂ emissions calculated using mass balance and manufacturer fuel consumption rates.

Attachment A. Notification Form¹

Klawock Power Generation Station

AQ1513ORL02

Stationary Source Name

Air Quality ORL Number.

Alaska Power & Telephone Co.

Company Name

When did you discover the Excess Emissions/ORL 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 "ORL deviations." However, use only Section 1 for events that involve excess emissions.

Deviation from ORL Conditions - Complete Section 2 and Certify

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

Deviation from COBC², CO³, or Settlement Agreement - Complete Section 2 and Certify

¹ Form based on SPC IV (revised as of July 22, 2020).

² Compliance Order By Consent

³ 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 ORL. Identify each emission standard potentially exceeded during the event and the exceedance.

EU ID	EU Name	ORL 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. ORL Deviations

(a) **ORL 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
- Other: _____

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

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

EU ID	EU Name	ORL 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 _____