

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

**[EPA Proposed - January 15, 2026]
Copper Valley Electric Association Inc
Glennallen Diesel Plant**

**STATEMENT OF BASIS
for the terms and conditions of
Permit No. AQ0287TVP06**

**Prepared by Victoria Jurado
ADEC AQ/APP (Wasilla)**

INTRODUCTION

This document sets forth the statement of basis for the terms and conditions of Operating Permit No. AQ0287TVP06.

STATIONARY SOURCE IDENTIFICATION

Section 1 of Operating Permit No. AQ0287TVP06 contains information on the stationary source as provided in the Title V permit application.

The Glennallen Diesel Plant is owned and operated by, Copper Valley **Electric Association Inc** and Copper Valley **Electric Association Inc** is the Permittee for the stationary source's operating permit. The SIC code for this stationary source is 4911- Electrical Services.

The stationary source is a diesel-powered electric generating stationary source. The generator sets at the stationary source range from 1,285 kW to 2,865 kW. This stationary source provides power to the Glenallen community.

EMISSIONS UNIT INVENTORY AND DESCRIPTION

Under 18 AAC 50.326(a), the Department requires operating permit applications to include identification of all emissions-related information, as described under 40 C.F.R. 71.5(c)(3).

The emissions units at the Glennallen Diesel **Plant** that have specific monitoring, recordkeeping, and reporting requirements are listed in Table A of Operating Permit No. AQ0287TVP06.

Table A of Operating Permit No. AQ0287TVP06 contains information on the emissions units regulated by this permit as provided in the application. The table is provided for informational and identification purposes only. Specifically, the emissions unit rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

A summary of the potential to emit (PTE)¹ and assessable PTE from the Glennallen Diesel Plant is shown in the table below.

Table C - Emissions Summary, in Tons Per Year (TPY)

Emissions	NO _x	CO	PM	SO ₂	VOC	CO _{2e} ¹	HAPs	Total ²
PTE	374.04	85.71	13.55	76.64	12.11	24,420.56	.5	563
Assessable PTE	375	86	14	77	13	0	0	565

Notes:

1. CO_{2e} emissions are defined as the sum of the mass emissions of each individual GHG adjusted for its global warming potential.
2. Total PTE and total assessable PTE shown in the table do not include CO_{2e} and HAPs.
3. HAP emissions are a subset of either VOC emissions or PM₁₀ emissions and are excluded from the assessable emissions total to avoid double counting.

¹ *Potential to Emit* or *PTE*, as defined in AS 46.14.990 (22), means the maximum capacity of a stationary source to emit a pollutant under its physical or operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, must be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source.

The assessable PTE listed under Condition 38.1 is the sum of the PTE of each individual air pollutant, other than greenhouse gases (GHGs). The emissions listed in Table C are estimates that are for informational use only. The listing of the emissions does not create an enforceable limit for the stationary source. PTE emissions are as provided in the application.

BASIS FOR REQUIRING AN OPERATING PERMIT

In accordance with AS 46.14.130(b), an owner or operator of a Title V source² must obtain a Title V permit consistent with 40 C.F.R. Part 71, as adopted by reference in 18 AAC 50.040.

Except for sources exempted or deferred by AS 46.14.120(e) or (f), AS 46.14.130(b) lists the following categories of sources that require an operating permit:

- A major source;
- A stationary source, including an area source, subject to federal New Source Performance Standards (NSPS) under Section 111 of the Clean Air Act or National Emission Standards for Hazardous Air Pollutants (NESHAP) under Section 112 of the CAA;
- Another stationary source designated by the Federal Administrator by regulation.

The Permittee is required to obtain an operating permit for the Glennallen Diesel Plant as specified under 18 AAC 50.326(a) and 40 C.F.R. 71.3(a), because the stationary source is a major source. This stationary source is a major source because as defined in Section 302 of the CAA, it directly emits, or has the potential to emit, 100 TPY or more of any air pollutant subject to regulation

AIR QUALITY PERMITS

Permits to Operate

Permit to Operate No. AQC-380, issued on July 28, 1975, and amended on May 2, 1978, was allowed to expire on January 30, 1983. AQC-380 was allowed to expire because state regulations required permits only for stationary sources subject to PSD rules. The PSD rules were promulgated in 1978, after the stationary source had been installed. Permit to Operate AQC-380 included all construction authorizations since it was issued before January 18, 1997 (the effective date of the new divided Title V permitting program). All stationary source-specific requirements established in this permit are included in this Title V operating permit, Permit No. AQ0287TVP06.

Title I (Construction and Minor) Permits

Construction Permit No. 9822-AC012. The Department issued Construction Permit No. 9822-AC012 to this stationary source on August 26, 1998. The Department established stationary source-specific requirements in this Title I permit. This permit authorized the installation of a diesel generator (EU ID 8) and imposed owner-requested limits (ORL) to avoid PDS limits for construction classification in 18 AAC 50.300(h)(3) (Repealed). The ORLs limited the amount of NO_x and SO_x from EU IDs 1 through 5 and 8. EU IDs 1 and 2 were decommissioned in 2008, and EU IDs 3, 4, 5, and 8 were decommissioned in 2019.

Minor Permit No. AQ0287MSS01. On December 17, 2007, the Permittee submitted a minor permit application to authorize the installation of the use of (EU ID 9) and employ new ORLs. The Permittee proposed to limit the NO_x to 244 tons per year for diesel engines to avoid classification

² *Title V source* means a stationary source classified as needing a permit under AS 46.14.130(b) [ref. 18 AAC 50.990(111)].

as PSD major source for any pollutant. This permit also decommissioned EU ID 1 and 2. The Department issued Minor Permit No. AQ0287MSS01 to this stationary source on August 6, 2008. This permits rescinded construction permit 9822-AC012.

Minor Permit No. AQ0287MSS02. On January 13, 2014, the Permittee submitted a minor permit application to employ new ORLs. The Permittee requested that NO_x limit be increased to 35 tons per year over the 339 tons of Baseline Actual Emissions in 2008. This limit would allow the applicant to avoid PSD review. The Department issued Minor Permit No. AQ0287MSS02 to this stationary source on May 13, 2014. The Department established stationary source-specific requirements in this Title I permit. All stationary source-specific requirements established in this permit are included in Operating Permit No. AQ0287TVP06 as described in Table D.

Title V Operating Permits

Permit No. 0287TVP01. The source had been operating with a permit since 1983, and the owner or operator submitted an application for an initial Title V operating permit dated December 8, 1997. The owner or operator amended the application on July 20, 1999. The Department deemed the application completed on July 20, 1999. The Department issued Operating Permit No. 0287TVP01 on July 26, 2000.

- **Revision No. 1:** An administrative revision updating Condition 11.3 and adding Condition 11.4 in Permit No. 0287TVP01, issued July 26, 2000.
- **Revision No. 2:** An administrative revision changing the designated agent from Richard Huffman to Jamie Linxiler, with format updates, revised by Don Bodron, August 15, 2003.
- **Revision No. 3:** An administrative revision updating information in the Stationary source and Building contact and Fee contact, revised by Grace Germain, December 23, 2023.
- **Revision No. 4:** Final.

Permit No. AQ0287TVP02. The Permittee submitted an application to renew Operating Permit No. 0287TVP01 dated January 21, 2005. The Department issued Operating Permit No. AQ0287TVP02 on November 15, 2005. This permit incorporated the requirements of Minor Permit AQ0287MSS01.

Permit No. AQ0287TVP03. Copper Valley Electric Association Inc submitted an application to renew Operating Permit No. AQ0287TVP02 dated May 25, 2010. The Department issued Operating Permit No. AQ0287TVP03 on September 30, 2010. This permit incorporated the requirements of Minor permit AQ0287MSS02.

Permit No. AQ0287TVP04. Copper Valley Electric Association Inc submitted an application to renew Operating Permit No. AQ0287TVP03 dated March 06, 2015. The Department issued Operating Permit No. AQ0287TVP04 on January 12, 2016.

Permit No. AQ0287TVP05. Copper Valley Electric Association Inc submitted an application to renew Operating Permit No. AQ0287TVP04 dated June 2, 2020. The Department issued Operating Permit No. AQ0287TVP05 on September December 17, 2020. The Department received the application for renewal of Operating Permit No. AQ0287TV05 on June 5, 2025.

COMPLIANCE HISTORY

The stationary source has operated at its current location since 1959. A full compliance evaluation (FCE), performed in 2023, showed the source was complying with requirements set forth in AQ0287TPV05 and FCE in 2021 showed compliance with only minor permit deviations.

Review of the permit files for this stationary source, which includes the past inspection reports and compliance evaluations, indicates a stationary source generally operating in compliance with its operating permit.

APPLICABLE REQUIREMENTS FROM PRECONSTRUCTION PERMITS

Incorporated by reference at 18 AAC 50.326(j), 40 C.F.R. Part 71.2 defines “applicable requirement” to include the terms and conditions of any preconstruction permit issued under rules approved in Alaska’s State Implementation Plan (SIP).

Alaska’s SIP includes the following types of preconstruction permits:

- Permit to Operate issued on or before January 17, 1997 (these permits cover both construction and operations);
- Construction permits issued on or after January 18, 1997; and
- Minor permits issued on or after October 1, 2004.

Preconstruction permit terms and conditions include both source-specific conditions and conditions derived from regulatory applicable requirements such as standard conditions, generally applicable conditions, and conditions that quote or paraphrase requirements in regulation. These requirements include, but are not limited to, each emissions unit- or source-specific requirement established in these permits issued under 18 AAC 50 that are still in effect at the time of issuance of Operating Permit No. AQ0287TVP06.

Table D below lists the requirements carried into Operating Permit No. AQ0287TVP06 to ensure compliance with the preconstruction permit requirements.

Table D - Comparison of Minor Permit No. AQ0287MSS02 Conditions to Operating Permit No. AQ0287TVP06 Conditions¹

AQ028MSS02 Condition No.	Description of Requirement	AQ0287TVP06 Condition No.	How Condition was Revised
4	PDS Avoidance Limits	13	Not Revised
5	Ambient Protections	12	Not Revised

Note:

1. This table does not include all standard and general conditions.

NON-APPLICABLE REQUIREMENTS

This section discusses standard conditions that have not been included in the permit and other requirements that are not included for specific reasons.

- **40 C.F.R. 64 Compliance Assurance Monitoring (CAM):** None of the emissions units at the stationary source use a control device to achieve compliance with emission limits or standards. Therefore, CAM requirements are not applicable.

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

The Department adopted regulations from 40 C.F.R. 71, as specified in 18 AAC 50.040(j), to establish operating permit regulations. The EPA fully approved the Alaska Operating Permit Program on November 30, 2001, as noted in Appendix A to 40 C.F.R. 70. This Statement of Basis, required under 40 C.F.R. 71.11(b), provides the legal and factual basis for each condition of Operating Permit No. AQ0287TVP06. Additionally, and as required by 40 C.F.R. 71.6(a)(1)(i), the state and federal regulations for each permit condition are cited in the permit.

Conditions 1 through 4, Visible Emissions Standard and MR&R

Legal Basis: These conditions require compliance with the applicable requirements in 18 AAC 50.055(a).

- 18 AAC 50.055(a) applies to the operation of fuel-burning equipment and industrial processes. EU ID(s) 6 through 9 are fuel-burning equipment or industrial processes.

U.S. EPA approved the addition of these standards to the SIP, as noted in 40 C.F.R. 52.70. The Department included permit conditions for MR&R as required by 40 C.F.R. 71.6(a)(3) and 71.6(c)(1).

Factual Basis: Condition 1 prohibits the Permittee from causing or allowing visible emissions in excess of the applicable standard in 18 AAC 50.055(a)(1). MR&R requirements are listed in Conditions 2 through 4 (for liquid fuel-burning equipment). These conditions have been adopted into regulation as Standard Permit Condition (SPC) IX – Visible Emissions and Particulate Matter Monitoring Plan for Liquid Fuel-Burning Equipment. The Smoke/No Smoke plan is not included because it is not used by the Permittee.

Beyond as noted above, the Department has determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emissions unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions meet the requirements of 40 C.F.R. 71.6(a)(3).

The Permittee must establish by visual observations of emissions unit exhaust, which may be supplemented by other means (e.g., a defined stationary source operation and maintenance program), that the stationary source is in continuous compliance with the state emission standards for visible emissions.

These conditions detail a stepwise process for monitoring to determine compliance with the state's visible emissions standard for liquid fuel-burning equipment. Equipment types covered by these conditions are stationary internal combustion engines, turbines, heaters, boilers, and flares. Initial monitoring frequency schedules are established along with subsequent reductions or increases in frequency depending on the results of the self-monitoring program.

Reasonable action thresholds are established in these conditions that require the Permittee to progressively address potential visible emission problems from emissions units either through maintenance programs and/or more rigorous tests that will quantify whether a specific emission standard has been exceeded.

Liquid Fuel- Burning Equipment:

Monitoring – The emissions unit exhaust must be observed by the Method 9 Plan as detailed in Condition 2. Corrective actions such as maintenance procedures or more frequent observations may be required depending on the results of the observations.

Recordkeeping - The Permittee is required to record the results of all observations of emissions unit exhaust and record any actions taken to reduce visible emissions.

Reporting - The Permittee is required to report emissions in excess of the state visible emissions standard and deviations from permit conditions. The Permittee is also required to include in the operating report copies of the results of all visible emission observations.

Conditions 5 through 8, PM Standard and MR&R

Legal Basis: These conditions require compliance with the applicable requirement in 18 AAC 50.055(b).

- 18 AAC 50.055(b)(1) applies to the operation of fuel-burning equipment and industrial processes. EU IDs 6 through 9 are fuel-burning equipment or industrial processes.

This PM standard applies because it is contained in the federally-approved SIP. The Department included permit conditions for MR&R as required by 40 C.F.R. 71.6(a)(3) and 71.6(c)(1).

Factual Basis: Condition 5 prohibits emissions in excess of the applicable state PM standard. MR&R requirements are listed in Conditions 6 through 8, of the permit. These conditions have been adopted into regulation as SPC IX. The Department has modified these conditions by deleting the requirement to record and report the exhaust stack diameters. These one-time requirements have already been fulfilled.

Beyond as noted above, the Department has determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No additional emissions unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions, as modified, meet the requirements of 40 C.F.R. 71.6(a)(3).

Liquid Fuel-Burning Equipment:

Monitoring – The Permittee is required to either take corrective action or conduct PM source testing, if opacity threshold values are exceeded. For liquid fuel-burning engines and turbines, the Department set opacity threshold values of 15 percent for stack diameters less than 18 inches and 20 percent for stack diameters equal to or greater than 18 inches. These opacity thresholds are based on a study conducted by the Department in an effort to establish a correlation between opacity and PM. The data was collected from diesel engines of various stack sizes and the results are as follows:

- For stacks normalized to 21 inches – 0.05 gr/dscf corresponds to 27% opacity
- For stacks normalized to 18 inches – 0.05 gr/dscf corresponds to 23% opacity
- For stacks normalized to 12 inches – 0.05 gr/dscf corresponds to 16.8% opacity
- For stacks normalized to 10 inches – 0.05 gr/dscf corresponds to 14.3% opacity

This means that the trend line for the complete data set predicts that 20% opacity corresponds to a little less than the PM limit for an 18-inch stack. There may be engines that exceed the thresholds, but the intent of the standard condition is not to guarantee that each engine that might exceed the PM standard will be tested. The Department expects few, if there are any, engines to actually be tested under this condition. What the Department does expect is that with the adopted condition in place, operators that find an opacity above or near the testing threshold will take corrective action necessary to reduce PM emissions. This would achieve the desired environmental outcome without the added cost of testing. The Department expects this to be the case with both thresholds.

The method is premised on the fact that a five percent difference in opacity is distinguishable. The conditions mean that if opacity readings as measured using Method 9 – with all of its limitations – exceed the threshold, the Permittee must either take corrective action or conduct a PM source test. The compliance conditions for PM do not draw a legal conclusion about whether the method shows compliance with the visible emissions standard.

Recordkeeping - The Permittee is required to record the results of PM source tests and visible emissions observations conducted during the source tests.

Reporting - The Permittee is required to report incidents when emissions in excess of the opacity threshold are observed and the results of PM source tests. The Permittee is also required to include copies of the results of all visible emission observations taken during PM source testing in the operating report.

standard based on reasonable inquiry.

Condition 9 through 11 Sulfur Compound Emissions Standard and MR&R

Legal Basis: This condition requires compliance with the sulfur compound emissions standard under 18 AAC 50.055(c).

- 18 AAC 50.055(c) applies to the operation of fuel-burning equipment and industrial processes. EU ID(s) 6 through 9 are fuel-burning equipment or industrial processes.

The sulfur compound standard applies because it is contained in the federally-approved SIP. The Department included permit conditions for MR&R as required by 40 C.F.R. 71.6(a)(3) and 71.6(c)(1).

Factual Basis: The Permittee may not cause or allow the affected equipment to violate the applicable sulfur compound standard. Sulfur dioxide comes from the sulfur in the fuel (e.g., coal, natural gas, fuel oils).

Liquid Fuels:

For the liquid fuel-burning equipment, EU IDs 6 through 9, the MR&R conditions are SPCs XI and XII adopted into regulation pursuant to AS 46.14.010(e). Sulfur dioxide comes from the sulfur in the liquid, hydrocarbon fuel (e.g., diesel or No.2 fuel oil). Fuel sulfur testing will verify compliance. Fuel containing no more than 0.75 percent sulfur by weight will always comply with the emission standard. For fuels with a sulfur content higher than 0.75 percent, the condition requires the Permittee to use the equations in Section 12, or

Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a)(3), to calculate the sulfur-dioxide concentration to show that the standard is not exceeded.

Condition 12 & 13, Preconstruction Permit Requirements

Legal Basis: The Permittee is required to comply with all stationary source-specific requirements that were carried forward from previous SIP-approved Permits to Operate (PTO) issued on or before January 17, 1997 and operating permits issued between January 18, 1997 and September 30, 2004, and with all stationary source-specific requirements in EPA PSD permits, SIP-approved construction permits, SIP-approved minor permits, and owner requested limits (ORLs) established under 18 AAC 50.225. These requirements include Best Available Control Technology (BACT), limits to ensure compliance with the attainment or maintenance of ambient air quality standards or maximum allowable ambient concentrations, and owner requested limits. Requirements from the permits listed above apply because they were originally developed through case-by-case action under a federally-approved SIP or approved operating permit program.

Factual Basis: The Title I Permit requirements have been incorporated into the Operating Permit AQ0287TV05 as described in Table D - Comparison of Minor Permit No. AQ0287MSS02 Conditions to Operating Permit No. AQ0287TVP06 Conditions¹

Condition 14, Insignificant Emissions Units

Legal Basis: The Permittee is required to meet the state emission standards 18 AAC 50.055 for all industrial processes and fuel-burning equipment regardless of size. 18 AAC 50.050(a) and 50.055 are contained in the federally-approved SIP. The Department also added permit conditions for MR&R as required by 40 C.F.R. 71.6(a)(3) and 71.6(c)(1).

Factual Basis: The condition requires insignificant emissions units to comply with the state emission standards for visible emissions, particulate matter emissions, and sulfur-compound emissions. Insignificant emissions units are not generally listed in operating permits unless specific monitoring, recordkeeping, and reporting are necessary to ensure compliance with the state emission standards. However, the Permittee may not cause or allow insignificant emissions units at the stationary source to violate these standards whether or not they are listed in the operating permit.

The Department finds that the insignificant emissions units at this stationary source do not require specific monitoring, recordkeeping and reporting to ensure compliance under these conditions.

Condition 14.4.a requires certification that the insignificant emissions units did not exceed state emission standards during the previous year and did not emit any prohibited air pollution, based on reasonable inquiry.

The Department used the language in SPC V, adopted by reference under 18 AAC 50.346(b)(4), for the permit condition.

Conditions 15 and 16 NSPS Subpart A Requirements

Legal Basis: The EPA approved Alaska's Part 70 Program granted on November 30, 2001 (40 C.F.R. 70 Appendix A). The Department is the permitting authority for the Part 70 program. As the permitting authority, the Department requires compliance with all permit conditions. Although the EPA has not delegated to the Department the authority to administer

the New Source Performance Standard (NSPS) program, NSPS requirements are included in the definition for “applicable requirement” under 40 C.F.R. 71.2, which has been adopted by the Department under 18 AAC 50.040(j)(1).

The NSPS provisions under Subparts A apply to the stationary source. Therefore, the Department requires compliance with those standards in a Part 70 permit issued under the approved program. However, the Department is unable to change the actual wording of the relevant standard to substitute “the Department” for “the Administrator” in those standards. Since the Department expects access to any permit-related information provided by the Permittee to the EPA, the Department will act on its responsibility as the permitting authority to determine compliance with the standard. To reflect this relationship and for the purposes of this permit, the Department has defined “the Administrator” to mean the “EPA and the Department” for conditions implementing the federal emission standards under Section 4.

The Permittee must comply with 40 C.F.R 60 Subpart A if the stationary source is subject to the requirements of another subpart under 40 C.F.R 60.

Conditions 15.1 - The Permittee has already complied with the notification requirements in 40 C.F.R. 60.7 (a)(1) - (4) for EU ID(s) 6 through 9. However, the Permittee is still subject to these requirements in the event of a new NSPS affected stationary source or in the event of a modification or reconstruction of an existing stationary source into an affected stationary source.

Condition 15.2 through 15.4 - The requirements to notify and submit reports electronically to the EPA, documenting engine maintenance and certification as stated in 40 C.F.R 60.4214 (f)&(g).

Condition 15.5 - The requirements to notify the EPA and the Department of any proposed replacement of components of an existing stationary source (40 C.F.R. 60.15) apply in the event that the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new stationary source.

Condition 16 - Concealment of emissions prohibitions in 40 C.F.R. 60.12 are applicable to EU ID(s) 6 through 9.

Factual Basis: Subpart A contains general requirements applicable to all affected facilities (emissions units) subject to NSPS. The intent of NSPS is to provide technology-based emission control standards for new, modified, and reconstructed affected facilities. General provisions of Subpart A applies to owners or operators who are subject to a relevant subpart under Part 60, except when otherwise specified in an applicable subpart or relevant standard. In general, the intent of Subpart A is to eliminate the repetition of requirements applicable to all owners or operators affected by NSPS.

Conditions 17 through 20, NSPS Subpart III Requirements

Legal Basis: NSPS Subpart III applies to stationary compression ignition internal combustion engines (CI ICE) that commence construction, modification, or reconstruction after July 11, 2005 where the stationary CI ICEs are manufactured after April 1, 2006 for non-fire pump engines and manufactured as a certified National Fire Protection Association (NFPA) fire pump engine after July 1, 2006 for fire pump engines. EU ID 9 is subject to the requirements of Subpart III because it is a non-fire pump engine manufactured in 2008.

Factual Basis: These conditions incorporate the Subpart III emissions standards applicable to EU ID 9. The Permittee may not cause or allow these emissions units to violate these standards. These conditions also provide MR&R specifically called out for the EUs within the Subpart. The Permittee is required to operate and maintain the stationary CI ICE according to the manufacturer's written instructions or procedures developed by the Permittee that are approved by the engine manufacturer.

Condition 18 establishes testing requirements and Condition 20 provides MR&R requirements that are applicable to EU ID 9.

Condition 19 - Establishes the emission standards that apply to EU ID 9. The emission standards in Subpart III-affected CI ICE depend on several factors, including, but not limited to, the unit's purpose (whether emergency or non-emergency), model year, displacement in liters/cylinder (L/cyl), and location.

Because the stationary source location meets the definition of "remote Alaska" in 40 C.F.R. 60.4219. It is not connected to the Alaska Railbelt Grid as defined in 40 C.F.R. 60.4219, the sources' generating capacity is less than 12 megawatts and 10% of its produced power goes servers resident. The applicable standards and MR&R requirements for EU ID 9 are rooted from the provisions under 40 C.F.R. 60.4216 that specifically address engines used in remote Alaska.

40 C.F.R. 60.4216(c) allows the Permittee to comply with the applicable emission standards for emergency engines in 40 C.F.R. 60.4202 and 60.4205, and not those for non-emergency engines in 40 C.F.R. 60.4201 and 60.4204, whether the unit is operated as emergency or non-emergency CI ICE.

The stationary source is in a remote area of Alaska as defined in 40 C.F.R 60.4219 and the fuel requirements in 40 C.F.R 60.4207 are not applicable as specified in 40 C.F.R 60.4216(d).

The NSPS GAPCP requirements provided in 40 C.F.R. 60.4211(a), as reflected in Condition 17.1, suffices the State GAPCP requirement under 18 AAC 50.346(b)(5). MR&R requirements are provided in Conditions 17 and 20.

The provisions of NSPS Subpart III listed in Conditions 17 through 20 are current as amended through August 30, 2024. Should EPA promulgate revisions to this subpart, the Permittee must be subject to the revised final provisions as promulgated and not the superseded provisions summarized in these conditions.

Conditions 21, 40 C.F.R 61 Sub Part A & M Requirements

Legal Basis: The requirements of 40 C.F.R 61 are applicable requirements for Title V permitting purposes, as stated in item 4 of the "applicable requirement" definition under 40 C.F.R 71.2. The condition requires the Permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R 61, Subpart M, as adopted by reference under 18 AAC 50.040(b)(2)(F). The asbestos demolition and renovation requirements apply if the Permittee engages in asbestos demolition or renovation.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Conditions 22, 40 C.F.R 63 Subpart A Requirements

Legal Basis: The Permittee must comply with applicable National Emission Standards for Hazardous Air Pollutants (NESHAP). NESHAP requirements are included in the “applicable requirement” definition under 40 C.F.R 71.2, which has been adopted by the Department under 18 AAC 50.040(j)(1).

The Permittee must comply with 40 C.F.R 63 Subpart A if the stationary source is subject to the requirements of another subpart under 40 C.F.R 63.

Factual Basis: Subpart A contains general requirements applicable to all facilities and emissions units subject to NESHAP requirements.

Conditions 23 through 27, NESHAP Subpart ZZZZ Requirements

Legal Basis: The Department has incorporated by reference the NESHAP requirements for specific industrial activities, as listed in 18 AAC 50.040(c). NESHAP Subpart ZZZZ applies to owners and operators of any existing, new, or reconstructed stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. Glennallen Diesel Plant is an area source that contains RICE units.

Factual Basis: EU IDs 6 through 8 are existing non-emergency RICE with ratings greater than 300 horsepower (hp). Because the stationary source meets the criteria in 40 C.F.R 63.6603(b)(2)(i) through (iii), the numerical CO emission limitations in Subpart ZZZZ are not applicable, but the engines must meet the work and management practices for stationary non-emergency combustion ignition (CI) RICE with a rating of less than or equal to 300 hp as specified in Table 2d, Item 1 of Subpart ZZZZ. The engines are also exempt from the fuel requirements of 40 C.F.R 63.6604 because the stationary source meets the criteria in 40 C.F.R 63.6603(b)(2).

The general requirement for good air pollution control practices in 40 C.F.R 63.6605(b) and 63.6625(e) applies to the engines, and the Permittee must comply with the record-keeping requirements of 40 C.F.R 63.6655(e) and 40 C.F.R 63.6660. The Permittee is also required to include reports of deviations from NESHAP Subpart ZZZZ requirements with the stationary source operating reports, in accordance with 40 C.F.R 63.6650(f). Under 40 C.F.R 63.6645(a)(5), initial notification is not required for existing stationary CI RICE that are not subject to any numerical emission standards.

For the new engine (EU ID 9), the Permittee must comply with NESHAP Subpart ZZZZ by complying with the requirements of NSPS Subpart IIII.

Conditions 28 through 30, 40 C.F.R 82 Subpart F, G, & H Requirements

Legal Basis: The requirements of 40 C.F.R 82 are applicable requirements for Title V permitting purposes, as stated in item 12 of the “applicable requirement” definition under 40 C.F.R 71.2.

Condition 28 requires compliance with the applicable requirements in 40 C.F.R 82, as adopted by reference under 18 AAC 50.040(d). The requirements apply if the Permittee engages in the recycling or disposal of certain refrigerants. The condition requires the Permittee to comply with the standards for recycling and emission reduction of refrigerants in 40 C.F.R 82, Subpart F.

Conditions 29 and 30 also require compliance with the applicable requirement adopted under 18 AAC 50.040(d).

Condition 29 prohibitions apply to all stationary sources that use substitutes for ozone-depleting compounds.

Condition 30 prohibitions apply to all stationary sources that use halon for extinguishing fires and inert gas to reduce explosion risk. These conditions prohibit the Permittee from causing or allowing violations of these requirements.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation. These conditions also incorporate applicable 40 C.F.R 82 requirements.

Conditions 31, NESHAPs General Requirements

Legal Basis: These conditions require the Permittee to determine NESHAP rule applicability and require recordkeeping for those determinations and notifications as applicable.

Factual Basis: The Permittee has conducted an analysis of the stationary source and determined that it is not a major HAPs stationary source based on emissions. This condition requires the Permittee to notify the Department and Administrator if the stationary source becomes an affected source subject to a standard promulgated by EPA under 40 C.F.R part 63 and to keep records of applicability determinations and make those records available to the Department. Notifications of construction are also required as applicable.

Conditions 32 through 33, NESHAPs Reports and Waivers

Legal Basis: The Permittee is required to provide the Federal Administrator and Department with a copy of each emissions unit report for units subject to NSPS or NESHAP federal regulations under 18 AAC 50.326(j)(4). 40 C.F.R 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R 60, 40 C.F.R 61, and 40 C.F.R 63.

Conditions 34 through 36, Standard Terms and Conditions

Legal Basis: These are standard conditions required for all operating permits under 18 AAC 50.345(a) and (e)-(g). As stated in 18 AAC 50.326(j)(3), the standard permit conditions of 18 AAC 50.345 replace the provisions of 40 C.F.R. 71.6(a)(5) – (7).

Factual Basis: These are standard conditions that apply to all permits.

Condition 37, Administration Fees

Legal Basis: This condition requires compliance with the applicable fee requirements in 18 AAC 50.400-403. As stated in 18 AAC 50.326(j)(1), the provisions of 18 AAC 50.400 through 50.430 are applicable and 40 C.F.R. 71.9 is not applicable.

Factual Basis: Paying administration fees is required as part of obtaining and holding a permit with the Department or as a fee for a Department action. The regulations in

18 AAC 50.400-403 specify the amount, payment period, and the frequency of fees applicable to a permit action.

Conditions 38 and 39, Emission Fees

Legal Basis: These conditions require compliance with the applicable fee requirements in 18 AAC 50.410-420. The regulations specify the time period for the assessable emissions and the methods the Permittee may use to calculate assessable emissions. As stated in 18 AAC 50.326(j)(1), the provisions of 18 AAC 50.400 through 50.430 are applicable and 40 C.F.R. 71.9 is not applicable.

Factual Basis: The Department used the language in SPC I, adopted by reference under 18 AAC 50.346(b), for the permit. SPC I requires the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date. The assessable emissions are the lesser of the stationary source's potential or projected emissions of each air pollutant.

SPC I also allows the Permittee to recalculate the stationary source's assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1), assessable emissions are based on each air pollutant. Therefore, fees must be paid on any pollutant emitted whether or not the permit contains any limitation for that pollutant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emissions must be based on actual emissions for the previous calendar year. Since each current year's assessable emissions are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match.

Condition 40, Dilution

Legal Basis: This condition reiterates 18 AAC 50.045(a), which prohibits the Permittee from using dilution as an emission control strategy. 18 AAC 50.045 is included in the SIP approved by EPA and, therefore, is an applicable requirement, per 40 C.F.R. 71.2.

Factual Basis: The condition prohibits the Permittee from diluting emissions as a means of compliance with any standard in 18 AAC 50.

Condition 41, Reasonable Precautions to Prevent Fugitive Dust

Legal Basis: This condition reiterates 18 AAC 50.045(d), which requires a person to use reasonable precautions when handling, storing or transporting bulk materials or engaging in an industrial activity. 18 AAC 50.045 is included in the SIP approved by EPA and, therefore, is an applicable requirement, per 40 C.F.R. 71.2.

This requirement applies because the Permittee has an emission unit or activity listed under Table 7 of 18 AAC 50.346(c). The listed emission units and activities in Table 7 are: coal-fired boilers; coal handling facilities; construction of gravel pads or roads that are part of a permitted stationary source or other construction that has the potential to generate fugitive dust that reaches ambient air; commercial/industrial/municipal solid waste, air curtain, and medical waste incinerators; sewage sludge incinerators not using wet methods to handle that ash; mines; urea manufacturing; soil remediation units; or dirt roads under the control of the operator with frequent vehicle traffic.

Factual Basis: The Department used the language in SPC X for the permit. The condition requires the Permittee to take reasonable action to prevent particulate matter from being emitted into the ambient air in accordance with 18 AAC 50.045(d).

Condition 42, Stack Injection

Legal Basis: This condition reiterates 18 AAC 50.055(g), which prohibits the Permittee from releasing materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack (i.e., disposing of material by injecting it into a stack). 18 AAC 50.055 is included in the SIP approved by EPA and, therefore, is an applicable requirement, per 40 C.F.R. 71.2.

Stack injection requirements apply to stacks of emissions units at a stationary source constructed or modified after November 1, 1982.

Factual Basis: No specific monitoring for this condition is practical. Compliance is verified by inspections, because the emissions unit or stack would need to be modified to accommodate stack injection.

Condition 43, Air Pollution Prohibited

Legal Basis: This condition requires compliance with 18 AAC 50.110. 18 AAC 50.110 is included in the SIP approved by EPA and, therefore, is an applicable requirement, per 40 C.F.R. 71.2. The condition prohibits the Permittee from causing any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. The Department also included permit conditions for MR&R as required by 40 C.F.R. 71.6(a)(3) and 71.6(c)(1).

Factual Basis: The Department used the language in SPC II for the permit. This condition spells out how to monitor, record, and report prohibited air pollution. While the other permit conditions and emissions limitations should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints, and must submit copies of these records upon request of the Department.

Condition 44, Technology-Based Emission Standard

Legal Basis: The Permittee is required to take reasonable steps to minimize emissions if unavoidable emergency, malfunction, or non-routine repair activities cause an exceedance of any technology-based emission standard in this permit. This condition requires compliance with the requirement in 18 AAC 50.235. Technology-Based Emission Standard requirements apply because the stationary source contains equipment subject to a technology-based emission standard, such as BACT, MACT, LAER, NSPS or any other similar standard for which the stringency of the standard is based on determinations of what is technologically feasible, considering relevant factors.

Factual Basis: The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with

Condition 60. Excess emission reporting under Condition 60 requires information on the steps taken to minimize emissions. Monitoring compliance for this condition consists of the report required under Condition 60.

Condition 45, Open Burning

Legal Basis: The condition requires the Permittee to comply with the regulatory requirements in 18 AAC 50.065 when conducting open burning at the stationary source. 18 AAC 50.065 is included in the SIP approved by EPA and, therefore, is an applicable requirement, per 40 C.F.R. 71.2. The state open burning regulation in 18 AAC 50.065 applies to the Permittee if the Permittee conducts open burning at the stationary source.

Factual Basis: The Permittee may conduct open burning by following the provisions of 18 AAC 50.065 and by following the Department guidelines posted at the website <http://dec.alaska.gov/air/air-permit/open-burn-info>. Condition 45.1 requires the Permittee to keep records to demonstrate compliance with the standards for conducting open burning.

More extensive monitoring and recordkeeping is not warranted because the Permittee does not conduct open burning as a routine part of their business. Also, most of the requirements are prohibitions, which are not easily monitored. Compliance is demonstrated through annual certification required under Condition 62.

Condition 46, Requested Source Tests

Legal Basis: The Permittee is required to conduct source tests as requested by the Department. This requirement is under 18 AAC 50.220(a) and 50.345(k), which are included in the SIP approved by EPA.

Factual Basis: This condition applies because this is a standard condition to be included in all operating permits, as specified in 18 AAC 50.345(a). Compliance is demonstrated through the submission of the required source test plan and report.

Conditions 47 through 49, Operating Conditions, Reference Test Methods, Excess Air Requirements

Legal Basis: Conditions 47 and 49 require compliance with the applicable requirements in 18 AAC 50.220(b) and (c)(3), which are included in the SIP approved by EPA.

Condition 48 specifies source test methods, as required by 40 C.F.R. 71.6(a)(3)(i) and 71.6(c)(1). These requirements apply because the Permittee is required by the permit to conduct source tests or a source test may be requested by the Department. The Permittee is required to conduct source tests in the manner set out in Conditions 47 through 49.

Factual Basis: These conditions supplement the specific monitoring requirements stated elsewhere in this permit.

Condition 50, Test Exemption

Legal Basis: This condition incorporates the source test exemption in 18 AAC 50.345(a) regarding visible emissions observations. 18 AAC 50.345(a) is included in the SIP approved by EPA.

Factual Basis: As provided in 18 AAC 50.345(a), the requirements for test plans, notifications and reports do not apply to visible emissions observations by smoke readers, except in connection with required particulate matter testing.

Conditions 51 through 54, Test Deadline Extension, Test Plans, Notifications and Reports

Legal Basis: Condition 51 contains the requirement in 18 AAC 50.345(l), while Conditions 52 through 54 require compliance with the applicable requirements in 18 AAC 50.345(m) through (o). The requirements in 18 AAC 50.345(l) through (o) are included in the SIP approved by the EPA. These requirements constitute standard conditions that must be included in each operating permit, as specified in 18 AAC 50.345(a). Additionally, these requirements apply because the Permittee is required to conduct source tests as set out by this permit or as requested by the Department.

Factual Basis: These standard conditions supplement specific monitoring requirements stated elsewhere in this permit.

Condition 55, Particulate Matter Calculations

Legal Basis: This condition requires the Permittee to reduce particulate matter data in accordance with 18 AAC 50.220(f), which is included in the SIP approved by EPA. It applies when the Permittee tests for compliance with the particulate matter standards in 18 AAC 50.050 or 50.055.

Factual Basis: The condition incorporates a regulatory requirement for particulate matter source tests. This condition supplements specific monitoring requirements stated elsewhere in this permit.

Condition 56, Recordkeeping Requirements

Legal Basis: This condition requires the Permittee to keep records in accordance with 40 C.F.R. 71.6(a)(3)(ii), which the Department adopted by reference under 18 AAC 50.040(j)(4). It also incorporates the general NSPS recordkeeping requirement under 40 C. F. R. 60.7(f), which the Department adopted by reference under 18 AAC 50.040(a)(1).

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

40 C.F.R. 60.7(f) requires records retention for at least two years of the measurements required to be maintained by this Part while 40 C.F.R. 71.6(a)(3)(ii) requires at least five years of records retention. The five-year records retention requirement in Condition 56 satisfies both 40 C.F.R. 60.7(f) and 40 C.F.R. 71.6(a)(3)(ii).

Condition 57, Certification

Legal Basis: All operating permits must contain a requirement to certify permit applications, reports, affirmations, or compliance certification, per 18 AAC 50.345(j). The requirement is a part of the SIP approved by EPA.

Factual Basis: The Department used the language in SPC XVII, adopted by reference under 18 AAC 50.346(b)(10), for the permit condition. The requirement in 18 AAC 50.345(j) is a standard condition that must be included in each operating permit, as specified in 18 AAC 50.345(a). 18 AAC 50.345(j) allows the excess emissions reports to be certified with the

operating report. However, the Department reminds the Permittee that excess emissions reports must be submitted according to the applicable deadline given in Condition 60 and must not be withheld from the Department until the deadline for submittal of an operating report. This condition supplements the reporting requirements of this permit. The certification statement through electronic signature and options for submittal provide paperless options for reporting without compelling Permittees to any specific means of submission.

Condition 58, Submittals

Legal Basis: This condition applies because the Permittee is required to send reports to the Department and supplements the standard reporting and notification requirements of this permit.

Factual Basis: The Department used the language in SPC XVII, adopted by reference under 18 AAC 50.346(b)(10), for the permit condition. This condition lists the Department's appropriate address for reports and written notices. This condition states that the Department requires one certified copy of submitted reports (except as otherwise required by the Department or other conditions of the permit) and provides an allowance for either electronic or hard copy document submittals. The condition also directs the Permittee to refer to the submission instructions on the Department's Standard Permit Conditions webpage for additional information regarding document submittals (e.g., the appropriate Department address).

Condition 59, Information Requests

Legal Basis: All operating permits must include a condition that requires the Permittee to furnish certain information upon request, per 18 AAC 50.345(i). The requirement is part of the SIP approved by EPA.

Factual Basis: The requirement in 18 AAC 50.345(i) is a standard condition that must be included in each operating permit, as specified in 18 AAC 50.345(a). This condition requires the Permittee to submit information requested by the Department.

Condition 60 and Section 13, Excess Emission and Permit Deviation Reports and Notification Form

Legal Basis: This condition requires the Permittee to comply with the requirements in 18 AAC 50.235(a)(2) and 18 AAC 50.240(c). Also, the Permittee is required to notify the Department when emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions: the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The Department used the language in SPCs III and IV, adopted by reference under 18 AAC 50.346(b)(2), for the permit condition. The Department used the Notification Form in SPC IV adopted by reference under 18 AAC 50.346(b)(3), for the notification requirements (see Section 13).

The Department has modified Condition 60.3 and the Notification Form in Section 13 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).

Condition 61, Operating Reports

Legal Basis: The condition specifies reporting requirements as required by 40 C.F.R. 71.6(a)(3)(iii)(A) which the Department has adopted by reference under 18 AAC 50.040(j)(4).

Factual Basis: The Department used the language in SPC VII, adopted by reference under 18 AAC 50.346(b)(6), for the permit condition. The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements identified elsewhere in the permit.

The condition specifies that for the transition periods between an expiring permit and a renewal permit, the Permittee must ensure that there is date-to-date continuity between the expired permit and the renewal permit such that the Permittee reports against the permit terms and conditions of the permit that was in effect during those partial date periods of the transition. No format is specified. The Permittee may provide one report accounting for each permit term or condition and the effective permit at that time. Alternatively, the Permittee may choose to provide two reports:

- One accounting for reporting elements of permit terms and conditions from the end date of the previous operating report until the date of expiration of the old permit.
- A second operating report accounting for reporting elements of terms and conditions in effect from the effective date of the renewal permit until the end of the reporting period.

Condition 62, Annual Compliance Certification

Legal Basis: This condition requires compliance with the requirements in 40 C.F.R. 71.6(c)(5), which the Department adopted by reference under 18 AAC 50.040(j).

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification.

Condition 62.2 provides clarification of transition periods between an expiring permit and a renewal permit to ensure that the Permittee certifies compliance with the permit terms and conditions of the permit that was in effect during those partial date periods involved in the transition. 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.
- 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. A copy of the report is also required to be submitted to the EPA, either by mail or electronically.

Condition 63, Emission Inventory Reporting

Legal Basis: This condition requires the Permittee to submit emissions data to the state so the state is able to satisfy the federal requirement to submit emission inventory data from point sources to the EPA as required under 40 C.F.R. 51.15 and 51.321. The federal emission inventory requirement applies to sources defined as point sources in 40 C.F.R. 51.50. Under 18 AAC 50.275, the state also requires reporting of emissions triennially for stationary sources with an air quality permit, regardless of permit classification. This includes sources that do not meet the federal emission thresholds in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A. The state must report emissions data as described in 40 C.F.R. 51.15 and the data elements in Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A to EPA.

Factual Basis: The Department used the language in SPC XV, as adopted by reference under 18 AAC 50.346(b)(8), for the permit condition.

The emission inventory data is due to EPA 12 months after the end of the reporting year (40 C.F.R. 51.30(a)(1) and (b)(1)). Permittees have until April 30th to compile and submit the data to the Department. To expedite the Department's process of transferring data into EPA's electronic reporting system, the Department encourages Permittees to submit the emission inventory through the Department's electronic emission inventory submission system in the Permittee Portal on the Department's Air Online Services webpage <http://dec.alaska.gov/Applications/Air/airtoolsweb/>. A myAlaska account and profile are needed to gain access to the Permittee Portal. Other options are to submit the emission inventory via mail, email, or fax.

Detailed instructions on completing and submitting the emission inventory and the report form are available at the Point Source Emission Inventory page <http://dec.alaska.gov/Applications/Air/airtoolsweb/PointSourceEmissionInventory> by clicking the Emission Inventory Instructions button. The emission inventory instructions and report form may also be obtained by contacting the Department.

To ensure that the Department's electronic system reports complete information to the National Emissions Inventory, stationary sources with air quality permits are required to submit with each report emissions data described in 40 C.F.R. 51.15 and the data elements in Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A, as applicable. Title V stationary sources with potential annual emissions greater than or equal to any of the emission thresholds shown in Condition 63.1 for Type A (large) sources, as listed in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A, are required to report emission inventory data every year for the previous calendar year (also known as the inventory year). For triennial inventory years, Type A sources only need to submit one report, not both an annual report and a separate triennial report.

Stationary sources, excluding owner requested limits (ORLs) issued under 18 AAC 50.225 and preapproved emission limits (PAELs) issued under 18 AAC 50.230, that do not meet any of the emission thresholds in Condition 63.1 for Type A (large) sources are required to report emission inventory data every third year (i.e., triennially) for the previous inventory year under Condition 63.2.

Title V stationary sources with potential annual emissions greater than or equal to any of the emission thresholds for Type B (small) sources, as listed in Table 1 to Appendix A of 40 C.F.R. 51 Subpart A, are required to report emission inventory data every third year (i.e., triennially) for the previous inventory year. The emission thresholds for nonattainment areas vary depending on the nonattainment status of the area.

As of the issue date of this permit, the Glennallen Diesel Plant is a Type B stationary source.

Condition 64, Consistency of Reporting Methodologies

Legal Basis: Condition 64 is from 18 AAC 50.275(a) and requires all stationary sources, regardless of permit classification (with the exception of owner requested limits (ORLs) issued under 18 AAC 50.225 and preapproved emission limits (PAELs) issued under 18 AAC 50.230), to report actual emissions to the state so that the state can meet its obligation under 40 C.F.R. 51. Condition 64.1 is from 18 AAC 50.275(b) and requires consistency on the stationary sources' actual emissions reports submitted for NEI and the state's assessable emissions.

Factual Basis: The regulation was added to 18 AAC 50 on September 7, 2022 so as to include all stationary sources required to report actual emissions for the purpose of federal emissions inventory and to avoid inconsistencies in actual emissions reports submitted. When reporting actual emissions under Condition 63 or assessable emissions under Condition 38.2, consistent emission factors and calculation methods must be used for all reporting requirements for the stationary source.

Condition 65 through 65.2, NSPS and NESHAP Reports and Waivers

Legal Basis: The Permittee is required to provide the Department a copy of each report submitted to EPA as required for emissions units subject to NSPS or NESHAP federal regulations under 18 AAC 50.326(j)(4). Appendix A to 40 C.F.R. 70 documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60, 40 C.F.R. 61, and 40 C.F.R. 63. The reports themselves provide monitoring for compliance with this condition. For those notices and reports submitted through EPA's online reporting system, CDX-CEDRI, the Permittee is not required to submit a duplicate copy to the Department; a statement about the online submittal in the operating report would suffice.

Condition 65.3, Federal Electronic Reporting Allowance

Legal Basis: On September 25, 2024, EPA published a notice in the Federal Register (Vol. 89, No. 186, page 78300) allowing stationary sources subject to federal rules to electronically submit reports, notifications, or other submission types to CEDRI, consistent with the provisions of the Cross-Media Electronic Reporting Rule (CROMERR), codified under 40 C.F.R. 3.

Factual Basis: The electronic reporting provisions in Condition 65.3 is a general advisory option for stationary sources subject to federal rules to facilitate and streamline reporting requirements, in lieu of paper or email format. CROMERR establishes electronic reporting as an acceptable regulatory alternative to paper reporting and establishes requirements to assure that electronic documents are as legally dependable as their paper counterparts. The submittals must be in acceptable digital formats. *Acceptable digital formats* are file types that are

compatible with CEDRI or other EPA electronic document receiving system that the Administrator may designate.

Condition 66, Permit Applications and Submittals

Legal Basis: 40 C.F.R. 71.10(d)(1), adopted by reference by the Department under 18 AAC 50.040(j)(7), requires submission of a copy of each permit application to EPA.

Factual Basis: The Department used the language in SPC XIV, adopted by reference under 18 AAC 50.346(b)(7), for the permit condition. The condition directs the applicant to send a copy of each application for modification or renewal of this permit to the EPA. Condition 66.2 lists the methods, in EPA's preferred order, to which the applicant may submit the application documents, as specified in the EPA's February 12, 2024 memorandum guidance for Submitting Air Permits to EPA Region 10. This condition shifts the burden of compliance with 40 C.F.R. 71.10(d)(1) from the Department to the Permittee as allowed under 40 C.F.R. 71.10(d)(1).

Conditions 67 through 69, Permit Changes and Revisions Requirements

Legal Basis: The Permittee is obligated to notify the Department of certain off-permit source changes and operational changes under 18 AAC 50.326(j)(4). 40 C.F.R. 71.6(a)(8), (12), and (13), incorporated by reference under 18 AAC 50.040(j), require that these provisions be included in operating permits.

Factual Basis: 40 C.F.R. 71.6(a)(12) and (13), as reflected in Conditions 68 and 69, respectively, specify changes that may be made without a permit revision, and 40 C.F.R. 71.6(a)(8) (Condition 67) states permit revisions are not required for some emissions trading and similar programs.

The Permittee did not request trading of emission increases and decreases as described in 40 C.F.R. 71.6(a)(13)(iii); therefore, language addressing these provisions has not been included in this permit as part of Condition 67.

Condition 70, Permit Renewal

Legal Basis: The Permittee must submit a timely and complete operating permit renewal application if the Permittee intends to continue source operations in accordance with the operating permit program. The obligations for a timely and complete operating permit application are in 40 C.F.R. 71.5(a) – (c), adopted by reference in 18 AAC 50.040(j)(3), and 18 AAC 50.326(c).

Factual Basis: In accordance with AS 46.14.230(a), this operating permit is issued for a fixed term of five years after the date of issuance, unless a shorter term is requested by the permit applicant. The Permittee is required to submit an application for permit renewal by the specific dates applicable to the stationary source as listed in this condition. As stated in 40 C.F.R. 71.5(a)(1)(iii), submission for a permit renewal application is considered timely if it is submitted at least six months but no more than eighteen months prior to expiration of the operating permit. According to 40 C.F.R. 71.5(a)(2), a complete renewal application is one that provides all information required pursuant to 40 C.F.R. 71.5(c) and remits payment of fees owed under the fee schedule established pursuant to 18 AAC 50.400. 40 C.F.R. 71.7(b) states that if a source submits a timely and complete application for permit issuance (including

renewal), the source’s failure to have a permit is not a violation until the permitting authority takes final action on the permit application.

Therefore, as long as an application has been submitted within the timeframe specified under 40 C.F.R. 71.5(a)(1)(iii) and is complete before the expiration date of the existing permit, then the expiration of the existing permit is extended and the Permittee has the right to operate under that permit until the effective date of the new permit. However, this protection must cease to apply if, subsequent to the completeness determination, the applicant fails to submit by the deadline specified in writing by the Department any additional information needed to process the application.

Conditions 71 through 76, General Compliance Requirements and Schedule

Legal Basis: These conditions require compliance with the applicable requirements in 18 AAC 50.345(b) through (d) and (h) and 40 C.F.R. 71.6(c)(3). As stated in 18 AAC 50.345(a), the requirements in 18 AAC 50.345(b) through (d) and (h) are standard conditions that must be included in all operating permits issued by the Department.

Factual Basis: These are standard conditions for compliance required for all operating permits.

Conditions 77 and 78, Permit Shield

Legal Basis: These conditions require compliance with the requirements in 40 C.F.R. 71.6(f), which the Department has adopted by reference under 18 AAC 50.040(j)(4). These requirements apply because the Permittee has requested that the Department shield the stationary source from specific non-applicable requirements listed under this condition.

Factual Basis: Table B of Operating Permit No. AQ0287TVP06 shows the permit shield that the Department granted to the Permittee. The following table shows the requests that were denied and the reasons that they were denied.

The Department based the determinations on the permit application, past operating permit, Title I permits, and inspection reports. Should any of the shielded requirements become applicable during the permit term, the Permittee is required to take necessary steps to comply with all applicable requirements in a timely manner.

Table E - Permit Shields Denied

Shield Requested for:	Reason for Shield Request:	Reason for Denial
Standards of 40 C.F.R 63 Subpart JJJJJJ	The unit meets the definition of a hot water heater as defined in 40 C.F.R 63.11237, because the unit is rated less than 0.3 MMBtu/hr and produces hot water, not steam. Hot water heaters are not subject to the standards of Subpart JJJJJJ per 40 C.F.R §63.11195(f).	The three hot water heaters listed in the application are insignificant units under 18 AAC 50.326(e) with no applicable requirements other than the permit condition for insignificant units that are not listed in the operating permit. These units are not listed in the operating permit. Therefore, a permit shield is not necessary.