

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ1955MSS01

Preliminary Date – March 18, 2026

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ1955MSS01 to the Permittee listed below.

Permittee: **Soil Treatment Technologies, LLC**
8361 Petersburg Street, Anchorage AK 99507

Stationary Source: **Soil Remediation Unit 02 (SRU02)**

Location: 2301 Spar Avenue, Anchorage AK 99501

Project: Soil Remediation Unit 02

Permit Contact: Zack Kirk, 907-570-4806, z.kirk@sttalaska.com

The Permittee submitted an application for Minor Permit AQ1955MSS01 under 18 AAC 50.502(b)(2) to construct, operate, or relocate a thermal soil remediation unit with a rated capacity of at least five tons per hour of untreated material. The project is also classified under 18 AAC 50.508(5) for Owner Requested Limits (ORLs) to avoid the stationary source being classified as a major source of Hazardous Air Pollutants (HAPs) for Hydrogen Chloride under 18 AAC 50.316, and to avoid being classified as a Title V major source under 18 AAC 50.326.

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.

James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

AAAQS	Alaska Ambient Air Quality Standards	NESHAPs.....	National Emission Standards for Hazardous Air Pollutants [as contained in 40 C.F.R. 61 and 63]
AAC.....	Alaska Administrative Code	NO _x	nitrogen oxides
ADEC	Alaska Department of Environmental Conservation	NRE.....	nonroad engine
AOS	Air Online Services	NSPS	New Source Performance Standards [as contained in 40 C.F.R. 60]
AS.....	Alaska Statutes	O & M	operation and maintenance
ASTM.....	American Society for Testing and Materials	O ₂	oxygen
BACT	best available control technology	PM ₁₀	particulate matter less than or equal to a nominal 10 microns in diameter
bhp.....	brake horsepower	PM _{2.5}	particulate matter less than or equal to a nominal 2.5 microns in diameter
CDX.....	Central Data Exchange	ppm	parts per million
CEDRI.....	Compliance and Emissions Data Reporting Interface	ppmv, ppmvd.....	parts per million by volume on a dry basis
C.F.R.	Code of Federal Regulations	psia	pounds per square inch (absolute)
CAA.....	Clean Air Act	PSD	prevention of significant deterioration
CO	carbon monoxide	PTE.....	potential to emit
Department	Alaska Department of Environmental Conservation	SIC.....	Standard Industrial Classification
dscf	dry standard cubic foot	SIP	State Implementation Plan
EPA	US Environmental Protection Agency	SPC.....	Standard Permit Condition or Standard Operating Permit Condition
EU.....	emissions unit	SO ₂	sulfur dioxide
gr/dscf.....	grain per dry standard cubic foot (1 pound = 7000 grains)	The Act.....	Clean Air Act
gph.....	gallons per hour	TPH	tons per hour
HAPs	hazardous air pollutants [as defined in AS 46.14.990]	TPY	tons per year
hp	horsepower	VOC	volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
ID.....	emissions unit identification number	vol%	volume percent
kPa	kiloPascals	wt%	weight percent
kWe	Kilowatt-electric	wt% _{fuel}	weight percent of sulfur in fuel
lb/kW-hr	pounds per kilowatt-hour.		
MMBtu/hr.....	million British thermal units per hour		
MMscf	million standard cubic feet		
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 ID	Make/Model	Description	Fuel	Rating/Max Capacity
1	Gencor	Soil Remediation Unit (SRU) w/ cyclone and baghouse	-	25 tph
		Primary Burner (Dryer)	Natural Gas	20.66 MMBtu/hr
		Thermal Oxidizer	Natural Gas	7.46 MMBtu/hr

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.
2. **Verification of Equipment Specifications and Maintenance of Equipment.** The Permittee shall install and maintain the equipment listed in Table 1 according to the manufacturer's or operator's maintenance procedures. Keep a copy of the manufacturer's or operator's maintenance procedure onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

Section 2 Fee Requirements

3. **Fee Requirements.** The Permittee shall pay to the Department all assessed permit fees. Fee rates are set out in 18 AAC 50.400 – 499.
4. **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
 - 4.1 potential to emit of 95.38 TPY; or
 - 4.2 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.
5. **Assessable Emission Estimates.** The Permittee shall comply as follows:
 - 5.1 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 5.2. 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/>.
 - 5.2 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.
 - 5.3 If the stationary source has not commenced construction or operation on or before March 31st, the Permittee may submit to the Department's Anchorage office a waiver letter certified under 18 AAC 50.205 that states the stationary source's actual annual emissions for the previous calendar year are zero TPY and provides estimates for when construction or operation will commence.

- 5.4 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 set out in Condition 5.1.
- 6. Annual Compliance Fee.** For a stationary source not classified as needing a Title V permit, the Permittee shall pay an annual compliance fee as set out in 18 AAC 50.400(d), to be paid for each period from July 1 through the following June 30.

Section 3 State Emission Standards

7. **Visible Emissions for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU ID 1 listed in Table 1 or any fugitive emission point to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.
 - 7.1 For EU ID 1, burn only fuel gas as fuel.
 - 7.2 **Monitoring for Fugitive Emissions.** The Permittee shall comply with the monitoring, recordkeeping, and reporting requirements in Condition 13.

8. **Particulate Matter for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow particulate matter emitted from EU ID 1 listed in Table 1, to exceed 0.05 grains per dry standard cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
 - 8.1 Demonstrate compliance with the PM standard by complying with Conditions 7.1, 7.2, and 11.

9. **Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from EU ID 1 in Table 1, to exceed 500 parts per million (ppm) averaged over three hours.

Section 4 Operation and Maintenance Requirements

10. The Permittee shall operate in accordance with the provisions of Soil Treatment Technology's most recent Thermal Operations Plan approved by the Department's Contaminated Sites Program.
 - 10.1 Keep a record of the Contaminated Sites Program approval of the Thermal Operations Plan.
 - 10.2 Include a copy of the approval recorded in Condition 10.1 in the first operating report required by Condition 23 after the approval is received.
11. The Permittee shall operate and maintain the baghouse (including auger and induced draft fan) and thermal oxidizer on EU ID 1 to control particulate matter and VOC emissions. The baghouse and thermal oxidizer must be in operation at all times that EU ID 1 is in operation.
 - 11.1 Inspect the baghouse at least once every 30 operating days and replace worn or damaged bags within 72 hours of discovery.
 - a. Keep a log of all baghouse inspections and bag replacements.
 - 11.2 Record the dates and times EU ID 1 operates without the baghouse and/or thermal oxidizer operating.
 - 11.3 Report in accordance with Condition 22 any time EU ID 1 operates without the baghouse and/or thermal oxidizer operating.
 - 11.4 Report in each operating report required by Condition 23, if true, a statement that the baghouse and thermal oxidizers were in operation at all times EU ID 1 was in operation.
12. The Permittee shall operate EU ID 1, including the baghouse and thermal oxidizer, within the temperature and pressure ranges recommended by the manufacturer.
 - 12.1 Any time alarms or sensors indicate operation outside of a range recommended by the manufacturer, the Permittee shall take corrective action to restore operation to the recommended range(s).
 - 12.2 Record the dates and times when EU ID 1, including the baghouse and thermal oxidizer, are not operated according to the manufacturer's recommendations.
 - 12.3 Report the dates and times recorded under Condition 12.2 in accordance with Condition 22.
13. **Reasonable Precautions to Prevent Fugitive Dust.** A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.

- 13.1 The Permittee shall maintain and comply with its Fugitive Dust Control Plan. If requested by the Department, the Permittee will submit a revised plan that corrects any deficiencies raised by the Department. The revised plan will be submitted no later than six weeks after notice of deficiencies in the plan are received.
- 13.2 When operating, the Permittee shall perform daily inspections of sources of fugitive dust (bulk material handling and storage areas, roads, and EU ID 1) and take action to minimize the generation of fugitive dust, especially during material transfer activities.
- 13.3 During material transfer activities, when visible observations indicate the presence of fugitive dust, the Permittee shall use water¹ to control fugitive dust.
- 13.4 The Permittee shall keep records of:
 - a. compliants received by the Permittee and compliants received by the Department and conveyed to the Permittee (the Permittee may use Section 11);
 - b. any additional precautions that are taken
 - (i) to address complaints described in Condition 13.4a or to address the results of Department inspections that found potential problems; and
 - (ii) to prevent future fugitive dust problems; and
 - c. dates when water is applied to control fugitive dust and a list of the areas where water is applied.
- 13.5 The Permittee shall
 - a. report in accordance with Condition 26.3, and
 - b. include in the operating report required under Condition 22:
 - (i) copies of the records required under Condition 13.4c; and
 - (ii) if true, a statement that reasonable precautions and mitigative actions were implemented to prevent the release of airborne particulate matter and fugitive dust.

¹ Application of water shall not be required when freezing conditions exist.

Section 5 *Permit Classification Avoidance*

14. The Permittee is prohibited from collecting and remediating soils that may contain per- and polyfluoroalkyl substances (PFAS).
15. The Permittee is prohibited from collecting and remediating soils classified as hazardous waste under 40 C.F.R. 261.4(b) and 18 AAC 62.
16. **Hydrogen Chloride (HCl) Emissions Limit.** The Permittee shall limit the emissions of HCl from EU ID 1 to no greater than 9.9 tons in any consecutive 12-month period to avoid classification as a major source of hazardous air pollutants (HAP) as follows:
 - 16.1 The Permittee may remediate soils contaminated with chlorinated hydrocarbons following approval by the Department's Contaminated Sites Program.
 - 16.2 The Permittee shall determine average concentrations of chlorinated hydrocarbons in each batch of soil that may contain chlorinated hydrocarbons and provide the results to the Department prior to treatment.
 - 16.3 The Permittee shall conduct an initial source test when remediating soils contaminated with chlorinated hydrocarbons, using EPA Method 26A, to determine the emission rate of HCl.
 - a. By the end of each month, calculate and record:
 - (i) HCl emissions for the previous month, using the emissions rate determined by the source test results, following Department acceptance of the results, for all soil with a chlorinated hydrocarbon concentration equal to or less than the chlorinated hydrocarbon concentration of soil that was previously source tested.
 - (ii) HCl emissions for the previous 12-month period.
 - b. Conduct subsequent source tests on any batch of soil with a chlorinated hydrocarbon concentration greater than the chlorinated hydrocarbon concentration of soil that was previously source tested.
 - 16.4 Include copies of the records specified in Conditions 16.3a(i) and 16.3a(ii) in the operating report required by Condition 22.
 - 16.5 Report in accordance with Condition 21 whenever:
 - a. Conditions 16.1 through 16.4 are not met; or
 - b. HCl emissions exceed the limit in Condition 16.

Section 6 Recordkeeping, Reporting, and Certification Requirements

- 17. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five-years after the date of collection, including:
- 17.1 Copies of all reports and certifications submitted pursuant to this section of the permit; and
 - 17.2 Records of all monitoring required by this permit, and information about the monitoring including:
 - a. the date, place, and time of sampling or measurements;
 - b. the date(s) analyses were performed;
 - c. the company or entity that performed the sampling and analyses;
 - d. the analytical techniques or methods used in the analyses;
 - e. the results of the analyses; and
 - f. the operating conditions that existed at the time of sampling or measurement
- 18. 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.
- 18.1 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.
- 19. 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.
- 19.1 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/>.

20. Information Requests. The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke, reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.

21. Excess Emissions and Permit Deviation Reports. The Permittee shall report excess emissions and permit deviations as follows:

21.1 Excess Emissions Reporting. Except as provided in Condition 31, 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 26.1d.
- d. Report all other excess emissions not described in Conditions 26.1a, 26.1b, and 26.1c 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 27 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.

[18 AAC 50.235(a)(2), 50.240(c), 50.326(j)(3), & 50.346(b)(2)]

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

- a. Report 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 27 for permit deviations that occurred during the period covered by the report, whichever is sooner.

- 21.3 **Reporting Instructions.** When reporting either excess emissions or permit 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 Section 14 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/>.
22. **Operating Reports.** During the life of this permit,² the Permittee shall submit to the Department an operating report in accordance with Conditions 23 and 24 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.
- 22.1 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.
- 22.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 27.1, the Permittee shall identify
- a. the date of the excess emissions or permit deviation;
 - b. the equipment involved;
 - c. the permit condition affected;
 - 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
- 22.3 when excess emissions or permit deviation reports have already been reported under Condition 26 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.
23. **Regional Haze Visibility Protection Area.** The Permittee shall comply as follows:

² "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.

- 23.1 Maintain onsite for 10 years, records of any maintenance to any significant emissions unit that is not an insignificant emissions unit under 18 AAC 50.326(d) – (i), that has or may have an effect on any emission that affects visibility of Class I areas, including critical maintenance that has occurred or is planned to occur, including all schedules, practices, and maintenance records for each significant emissions unit and control device according to the manufacturer's emission-related written instructions.
- 23.2 For EU ID 1, include a best estimate of the projected equipment life of the significant emissions unit, if known, in the first operating report required in Condition 27 after the emissions unit is installed.
- 24. Annual Affirmation.** The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 23 of whether the stationary source is still accurately described by the application and this permit, and whether any changes have been made to the stationary source that would trigger the requirement for a new permit under 18 AAC 50.
- 25. Title V Major Source Application Submittal Date.** For a stationary source that directly emits, or has the potential to emit, 100 TPY or more of any air pollutant subject to regulation, the Permittee shall file a complete application to obtain the part 70 Title V Operating Permit within 12 months after commencing operation or reaching the 100 TPY threshold.
- 26. Air Pollution Prohibited.** No person may permit 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.
- 26.1 **Monitoring.** The Permittee shall monitor as follows:
- a. As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 31.
 - b. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
 - (i) after an investigation because of a complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of Condition 31; or
 - (ii) the Department notifies the Permittee that it has found a violation of Condition 31.
- 26.2 **Recordkeeping.** The Permittee shall keep records of
- a. the date, time, and nature of all emissions complaints received;
 - b. the name of the person or persons that complained, if known;

- c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 31; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

26.3 Reporting. The Permittee shall report as follows:

- a. With each stationary source operating report under Condition 27, the Permittee shall include a brief summary report which must include the following for the period covered by the report:
 - (i) the number of complaints received;
 - (ii) the number of times the Permittee or the Department found corrective action necessary;
 - (iii) the number of times action was taken on a complaint within 24 hours; and
 - (iv) the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.
- b. The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.
- c. If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 26.

27. Emission Inventory Reporting. Every third year by April 30, the Permittee shall submit to the Department reports of actual emissions for the previous calendar year, by emissions unit, of CO, NH₃, NO_x, PM₁₀, PM_{2.5}, SO₂, VOC and lead (Pb) and lead compounds, as follows:

- 27.1 The Permittee shall report the annual emissions and the required data elements under Condition 24.2 every third year for the previous calendar year as scheduled by the EPA.³

³ The calendar years for which reports are required are based on the triennial reporting schedule in 40 C.F.R. 51.30(b)(1), which requires states to report emissions data to the EPA for inventory years 2011, 2014, 2017, 2020, and every 3rd year thereafter. Therefore, the Department requires Permittees to report emissions data for the same inventory years by April 30 of the following year (e.g., triennial emission inventory report for 2020 is due April 30, 2021, triennial emission inventory report for 2023 is due April 30, 2024, etc.).

- 27.2 For each emissions unit and the stationary source, include in the report the required data elements⁴ contained within the form included in the Emission Inventory Instructions available at the Department's AOS system on the Point Source Emission Inventory webpage at <http://dec.alaska.gov/Applications/Air/airtoolsweb/PointSourceEmissionInventory>.
- 27.3 Submit the report in accordance with the submission instructions on the Department's Standard Permit Conditions webpage at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-xv-and-xvi-submission-instructions/>.
- 28. Consistency of Reporting Methodologies.** Regardless of permit classification, as of September 7, 2022, all stationary sources operating in the state shall report actual emissions to the Department, either upon request or to meet individual permit requirements, in order for the state to meet federal reporting requirements under 40 C.F.R. Part 51, Subpart A.
- 28.1 For the purposes of reporting actual or assessable emissions required under Condition 24 and Condition 4.2, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.

⁴ The required data elements to be reported to the EPA are outlined in 40 C.F.R. 51.15 and Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A.

Section 7 *Standard Permit Conditions*

29. 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
 - 29.1 an enforcement action; or
 - 29.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
30. 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.
31. 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.
32. 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.
33. The permit does not convey any property rights of any sort, nor any exclusive privilege.
34. 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
 - 34.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 34.2 have access to and copy any records required by this permit;
 - 34.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 34.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 8 General Source Test Requirements

- 35. 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.
- 36. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
- 36.1 at a point or points that characterize the actual discharge into the ambient air; and
 - 36.2 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.
- 37. Reference Test Methods.** The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:
- 37.1 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 Section 14 of this permit to record data.
 - 37.2 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.
 - 37.3 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.
 - 37.4 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.
- 38. 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).
- 39. Test Exemption.** The Permittee is not required to comply with Conditions 38, 39 and 40 when the exhaust is observed for visible emissions by Method 9 Plan.
- 40. 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.

- 41. 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 40 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.
- 42. 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.
- 43. 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 23. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.

Section 9 *Permit Documentation*

<u>Date</u>	<u>Document Details</u>
December 23, 2025	Application Received for Minor Permit AQ1955MSS01.
January 26, 2026	Department receives additional information pertaining to Soil Remediation Unit 02 (SRU02).
February 18, 2026	Department receives additional information pertaining to Soil Remediation Unit 02 (SRU02).

Section 10 Complaint Form

COMPLAINT FORM

Date _____ Time: _____

Activities Involved:

Provide a description of reported complaint. Attach sheets as necessary.

If applicable, operational conditions which contributed to the complaint:

If applicable, ambient conditions which contributed to the complaint:

If applicable, describe measures taken to immediately address the complaint.

If applicable, describe measures taken to address preventing the condition which generated the complaint.

If applicable, describe any reason that you feel the complaint may not be a violation:

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

Signature

Date

Section 11 Visible Emissions Form

VISIBLE EMISSIONS OBSERVATION FORM

This form is designed to be used in conjunction with EPA Method 9, “Visual Determination of the Opacity of Emissions from Stationary Sources.” Temporal changes in emission color, plume water droplet content, background color, sky conditions, observer position, etc. should be noted in the comments section adjacent to each minute of readings. Any information not dealt with elsewhere on the form should be noted under Additional Information. Following are brief descriptions of the type of information that needs to be entered on the form. For a more detailed discussion of each part of the form, refer to “Instructions for Use of Visible Emission Observation Form” (a copy is available in <https://www3.epa.gov/ttnemc01/methods/webinar8.pdf>).

- Source Name: full company name, parent company or division or subsidiary information, if necessary.
- Address: street (not mailing or home office) address of facility where visible emissions observation is being made.
- Phone (Key Contact): number for appropriate contact.
- Stationary Source ID Number: number from NEDS, agency file, etc.
- Process Equipment, Operating Mode: brief description of process equipment (include type of facility) and operating rate, % capacity, and/or mode (e.g., charging, tapping, shutdown).
- Control Equipment, Operating Mode: specify type of control device(s) and % utilization, control efficiency.
- Describe Emission Point: for identification purposes, stack or emission point appearance, location, and geometry; and whether emissions are confined (have a specifically designed outlet) or unconfined (fugitive).
- Height Above Ground Level: stack or emission point height relative to ground level; can use engineering drawings, Abney level, or clinometer.
- Height Relative to Observer: indicate height of emission point relative to the observation point.
- Distance from Observer: distance to emission point; can use rangefinder or map.
- Direction from Observer: direction plume is traveling from observer.
- Describe Emissions and Color: include physical characteristics, plume behavior (e.g., looping, lacy, condensing, fumigating, secondary particle formation, distance plume visible, etc.), and color of emissions (gray, brown, white, red, black, etc.). Note color changes in comments section.
- Visible Water Vapor Present? check “yes” if visible water vapor is present.
- If Present, note in the Comments column whether the Plume is “attached” if water droplet plume forms prior to exiting stack, and “detached” if water droplet plume forms after exiting stack.
- Point in Plume at Which Opacity was Determined: describe physical location in plume where readings were made (e.g., 1 ft above stack exit or 10 ft. after dissipation of water plume).
- Describe Plume Background: object plume is read against, include texture and atmospheric conditions (e.g., hazy).
- Background Color: sky blue, gray-white, new leaf green, etc.
- Sky Conditions: indicate color of clouds and cloud cover by percentage or by description (clear, scattered, broken, overcast).
- Wind Speed: record wind speed; can use Beaufort wind scale or hand-held anemometer to estimate.
- Wind Direction From: direction from which wind is blowing; can use compass to estimate to eight points.
- Ambient Temperature: in degrees Fahrenheit or Celsius.
- Wet Bulb Temperature: can be measured using a sling psychrometer
- RH Percent: relative humidity measured using a sling psychrometer; use local US Weather Bureau measurements only if nearby.
- Source Layout Sketch: include wind direction, sun position, associated stacks, roads, and other landmarks to fully identify location of emission point and observer position.
- Draw North Arrow: to determine, point line of sight in direction of emission point, place compass beside circle, and draw in arrow parallel to compass needle.
- Sun’s Location: point line of sight in direction of emission point, move pen upright along sun location line, mark location of sun when pen’s shadow crosses the observer’s position.
- Observation Date: date observations conducted.
- Start Time, End Time: beginning and end times of observation period (e.g., 1635 or 4:35 p.m.).
- Data Set: percent opacity to nearest 5%; enter from left to right starting in left column. Use a second (third, etc.) form, if readings continue beyond 30 minutes. Use dash (-) for readings not made; explain in adjacent comments section.
- Comments: note changing observation conditions, plume characteristics, and/or reasons for missed readings.
- Range of Opacity: note highest and lowest opacity number.
- Observer’s Name: print in full.
- Observer’s Signature, Date: sign and date after performing VE observation.
- Observer’s Affiliation: observer’s employer.
- Certifying Organization, Certified By, Date: name of “smoke school,” certifying observer, and date of most recent certification.

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR PERMITS PROGRAM - VISIBLE EMISSIONS OBSERVATION FORM							Page No.
Stationary Source Name		Type of Emission Unit		Observation Date		Start Time	End Time
Emission Unit Location			Sec	0	15	30	45
City			Min				Comments
State		Zip		1			
Phone # (Key Contact)		Stationary Source ID Number		2			
Process Equipment		Operating Mode		3			
Control Equipment		Operating Mode		4			
Describe Emission Point/Location				5			
Height above ground level	Height relative to observer	Clinometer Reading		6			
Distance From Observer		Direction From Observer		7			
Start	End	Start	End	8			
Describe Emissions & Color				9			
Start	End			10			
Visible Water Vapor Present? If yes, determine approximate distance from the stack exit to where the plume was read				11			
No	Yes			12			
Point in Plume at Which Opacity Was Determined				13			
Describe Plume Background		Background Color		14			
Start	Start			15			
End	End			16			
Sky Conditions:				17			
Start	End			18			
Wind Speed		Wind Direction From		19			
Start	End	Start	End	20			
Ambient Temperature		Wet Bulb Temp	RH percent	21			
SOURCE LAYOUT SKETCH: 1 Stack or Point Being Read 2 Wind Direction From				22			
3 Observer Location 4 Sun Location 5 North Arrow 6 Other Stacks				23			
				24			
				25			
				26			
				27			
				28			
				29			
Additional Information:				30			
				Range of Opacity:			
				Minimum		Maximum	
I have received a copy of these opacity observations				Print Observer's Name			
Print Name:				Observer's Signature		Date	
Signature:						Observer's Affiliation:	
Title		Date		Certifying Organization:			
				Certified By:		Date	
Data Reduction:							
Duration of Observation Period (minutes):			Duration Required by Permit (minutes):				
Number of Observations:			Highest Six-Minute Average Opacity (%):				
Number of Observations exceeding 20%:			Highest 18-Consecutive -Minute Average Opacity (%)(engines and turbines only)				
In compliance with six-minute opacity limit? (Yes or No)							
Average Opacity Summary:							
Set Number	Time		Opacity		Sum	Average	Comments
	Start	End					

Section 12 Notification Form⁵

Soil Remediation Unit 02

Stationary Source Name

Soil Treatment Technologies, LLC

Company Name

AQ1955MSS01

Air Quality Permit Number

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 COBC⁶, CO⁷, or Settlement Agreement - Complete Section 2 and Certify

⁵ Revised as of July 22, 2020.

⁶ Compliance Order By Consent

⁷ 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 18.)*

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)]