DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ0982MSS12 **Preliminary – April 10, 2026**
Rescinds Permit: AQ0982MSS10 & Revision 1
AQ0982MSS11

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0982MSS12 to the Permittee listed below.

Permittee:	**Furie Operating Alaska, LLC** 433 W. 9th Avenue Anchorage, AK 99501
Stationary Source:	**Kitchen Lights Unit**
Location:	ADL 389928 ADL 389927 ADL 390381 ADL 389930 ADL 389929 ADL 389514 ADL 389513 ADL 390374 ADL 389197 ADL 389196 ADL 390554 ADL 389198 ADL 389515 ADL 389189 ADL 389924 ADL 389507 ADL 389923 ADL 391106 ADL 389191 ADL 389190 ADL 389925 ADL 389926 ADL 390548 ADL 389193 ADL 389192 ADL 389918 ADL 389917 ADL 389915 ADL 389914 ADL 389919
Project:	Revise terms and conditions (T/Cs) of AQ0982MSS11 and permit hygene to consolidate T/Cs.
Permit Contact:	Mark Slaughter, CCO M.Slaughter@furiealaska.com (907) 277-3726

This project is classified under 18 AAC 50.508(6) for revising and rescinding the terms and conditions of Air Quality Minor Permits AQ0982MSS10, AQ0982MSS10 Revision 1, and AQ0982MSS11. The permit also carries forward classifications of 18 AAC 50.502(c)(2)(A) for relocation of a portable oil and gas operation; and 18 AAC 50.508(5) for establishing owner requested limits (ORLs).

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.

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James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

AAAQS .....Alaska Ambient Air Quality Standards
AAC.....Alaska Administrative Code
ADEC .....Alaska Department of Environmental Conservation
ADL.....Alaska Division of Lands Number
ALP .....Allegra Leigh Platform
AOS.....Air Online Services
AS.....Alaska Statutes
ASTM.....American Society for Testing and Materials
bhp.....brake horsepower
C.F.R. .....Code of Federal Regulations
CAA.....Clean Air Act
CO .....carbon monoxide
Department .....Alaska Department of Environmental Conservation
dscf .....dry standard cubic foot
EPA .....US Environmental Protection Agency
EU.....emissions unit
EU ID .....emissions unit identification
gr/dscf.....grain per dry standard cubic foot (1 pound = 7000 grains)
hp.....horsepower
kWe .....kilowatt-electric
KLU.....Kitchen Lights Unit
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
NG.....natural gas
NO_X .....nitrogen oxides
NRE.....nonroad engine
PM_{10} .....particulate matter less than or equal to a nominal 10 microns in diameter
$PM_{2.5}$.....particulate matter less than or equal to a nominal 2.5 microns in diameter
ppm .....parts per million
ppmv.....parts per million by volume
ppmw.....parts per million by weight
psi .....pounds per square inch
PTE.....potential to emit
SIC.....Standard Industrial Classification
SIP .....State Implementation Plan
SPC.....Standard Permit Condition or Standard Operating Permit Condition
SO_2 .....sulfur dioxide
The Act.....Clean Air Act
TPY .....tons per year
ULSD .....ultra-low sulfur diesel
VOC .....volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
$wt\%S_{fuel}$ .....weight percent of sulfur in fuel

Section 1 Emissions Unit Inventory

Emissions Unit (EU) Authorization. The Permittee is authorized to operate the Kitchen Lights Unit (KLU) and associated equipment within the lease locations identified on the cover page of this permit and in accordance with the terms and conditions of this permit. The KLU and associated equipment may consist of the EUs listed in Table 1 and Table 2. Unless noted elsewhere in this permit, the information in Table 1 and Table 2 is for identification purposes only. The specific EU descriptions do not restrict the Permittee from replacing an EU identified in Table 1 and Table 2.

Table 1 – Platform[1] Emissions Units

EU ID	Description	Make/Model	Rating/Capacity	Fuel	Installation Date
1a	Generator	Waukesha VGF F18GL	402 hp	Natural Gas (NG)	2019
2a	Generator	Waukesha VGF F18GL	402 hp	NG	2019
3a	Auxiliary Generator	Caterpillar C9.3 ACERT	274 kWe	Diesel	2019
4	Heater	EAP-3100	1.2 MMBtu/hr	NG	2014
5a	Heater	Cor-Val CH2	1.5 MMBtu/hr	NG	2025
6	Platform Crane	Caterpillar 3412	600 bhp (403 kW)	Diesel	2014
7	Continuous Purge Vent	ZZZ-2400 (50 PSI)	204.1 scf/hr	Vents Field Gas	2014
8	Heater	TBD	5.0 MMBtu/hr	NG	Spring 2026
12	Fuel Tank	Not Available	4,000 gallons	ULSD	2014

Notes:

1. Platform name is Allegra Leigh Platform (ALP) as of issuance of this permit and may change in the future.

Table 2 – Drill Rig and Associated Emissions Units[2, 3]

EU ID	Description	Make/Model	Rating/Capacity	Fuel	NRE Status[1]
Combustion Units					
57	Rig Engine #1[2a, 2b ,2c]	Caterpillar D-399	970 bhp	Diesel	Yes

EU ID	Description	Make/Model	Rating/Capacity	Fuel	NRE Status[1]
58	Rig Engine #2[2a, 2b, 2c]	Caterpillar D-399	970 bhp	Diesel	Yes
59	Rig Engine #3[2a, 2b, 2c]	Caterpillar D-398	970 bhp	Diesel	Yes
60	Rig Engine #4[2a]	Caterpillar D-398	970 bhp	Diesel	Yes
61	Rig Engine #5 (Emergency Generator)	Caterpillar D-398	970 bhp	Diesel	Yes
62	Rig Engine #6[2a, 2b, 2c]	Caterpillar D-398	1,100 bhp	Diesel	Yes
63	Rig Engine #7[2a, 2b, 2c]	Caterpillar D-398	1,100 bhp	Diesel	Yes
64	STBD Crane Engine[2a, 2b, 2c]	Caterpillar D-3306	300 bhp	Diesel	Yes
65	PORT Crane Engine[2a, 2b, 2c]	Detroit Diesel 671	285 bhp	Diesel	Yes
66	Temporary Well Testing Flare	TBD	25 MMscf/day	Fuel Gas	No
Temporary Well Servicing and Testing Equipment					
67	Stimulation (Frac) Pump 1	TBD	2,250 bhp	Diesel	Yes
68	Stimulation (Frac) Pump 2	TBD	2,250 bhp	Diesel	Yes
69	Stimulation (Frac) Pump 3	TBD	2,250 bhp	Diesel	Yes
70	CTU-1 Power Pack	TBD	360 bhp	Diesel	Yes
71	CT N2 Pump Skid	TBD	255 bhp	Diesel	Yes
72	CT Pump Skid	TBD	360 bhp	Diesel	Yes
73	Well Test Equipment Boilers/Heaters	TBD	5 MMBtu/hr	Diesel	No
74	Well Test Engine(s)	TBD	1,760 bhp	Diesel	Yes
75	Cement Pump 1[2b]	Detroit Diesel 8V671	490 bhp	Diesel	Yes
76	Cement Pump 2[2b]	Detroit Diesel 8V671	490 bhp	Diesel	Yes

EU ID	Description	Make/Model	Rating/Capacity	Fuel	NRE Status[1]
80	Cement Pump 3[2b]	Detroit Diesel 3-71	113 bhp	Diesel	Yes
Storage Tanks					
77	Diesel Fuel Storage Tank #10	NA	32,943 gallons	NA	NA
	Diesel Fuel Storage Tank #11	NA	646 gallons	NA	NA
	Diesel Fuel Storage Tank #12	NA	28,663 gallons	NA	NA
	Diesel Fuel Storage Tank #13	NA	3,305 gallons	NA	NA
Emergency Escape					
78	Lifeboat 1 Engine[2a]	Behi 65 Man	36 bhp	Diesel	Yes
79	Lifeboat 2 Engine[2a]	Behi 65 Man	36 bhp	Diesel	Yes
Other Third-Party Engines					
81	E-Line Unit[2c]	TBD	150 bhp	Diesel	Yes
82	Coil Unit[2c]	TBD	150 bhp	Diesel	Yes
83	Power Tongs[2c]	TBD	150 bhp	Diesel	Yes
84	Other 3rd Party[2c]	TBD	150 bhp	Diesel	Yes

Notes:

1. EUs classified as nonroad engines (NREs) must meet the definition of NRE in 40 C.F.R. 1068.30.
2. The following EUs are operated during the following:
   a. Drilling (cumulative NRE rating of 6,737 bhp)
   b. Cementing (cumulative NRE rating of 6,788 bhp)
   c. Support (cumulative NRE rating of 5,995 bhp, assumes up to two third-party engines of 150 bhp each in operation)
3. The Permittee may operate a similar drill rig within the permitted cumulative NRE rating limit, as specified in Condition 19.

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 and Table 2 according to the manufacturer's or operator's maintenance procedures. Keep a copy of either the manufacturer's or operator's maintenance procedures onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

3. **Drill Rig Location and Operation.** The Permittee shall comply with the following:

3.1 Notify the Department in accordance with Condition 29

a. prior to relocating a drilling rig to a location where drilling operations are authorized under this permit; and

b. anytime a new rig is brought onto the site for drilling operations. Include the specifications and changes to the emissions when compared to the Yost Drill Rig.

3.2 The monitoring, recordkeeping, and reporting requirements of Conditions 19 through 22 do not apply when the drill rig is not at the locations authorized under this permit.

a. Include in each operating report in accordance with Condition 32 (as applicable)

(i) the notification requirements specified in Condition 3.1;

(ii) the dates of installation and/or removal of the drill rig from the KLU during the reporting period; and

(iii) a summary of drilling operations that were covered during the reporting period; or

(iv) provide a statement that the drill rig was not installed at the KLU during the reporting period.

3.3 Report in accordance with Condition 31 if the requirements of Condition 3.1 or 3.2 are not met or if any EU classified as an NRE is operated in a matter that would no longer meet the definition of NRE in 40 C.F.R. 1068.30.

Section 2 Fee Requirements

4. Administration Fees. The Permittee shall pay to the Department all assessed permit fees. Fee rates are set out in 18 AAC 50.400-499.

5. 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

5.1 potential to emit of 191.23 TPY (53.15 TPY without drill rig); or

5.2 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.

6. Assessable Emission Estimates. The Permittee shall comply as follows:

6.1 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/.

6.2 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.

6.3 If no estimate or waiver letter is submitted on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set out in Condition 5.1.

Section 3 State Emission Standards

Visible Emissions Standard

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 IDs 1a, 2a, 3a, 4, 5a, 6, 8, 66, and 73 listed in Table 1 and Table 2 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

7.1 For EU IDs 3a and 6, as long as actual emissions from the emissions unit are less than the significant emissions thresholds listed in 18 AAC 50.326(e)[1] during any consecutive 12-month period, certify in each operating report under Condition 32, compliance with the visible emissions standard based on reasonable inquiry. Otherwise, comply with Condition 7.2.

7.2 The Permittee shall report in the operating report under Condition 32 if any of EU IDs 3a and 6 reaches any of the significant emissions thresholds listed in 18 AAC 50.326(e) and monitor, record, and report in accordance with Conditions 8 through 10 for the remainder of the permit term for that emissions unit.

7.3 For each boiler/heater included as EU ID 73, certify in each operating report required under Condition 32, compliance with the visible emission standard based on reasonable inquiry.

7.4 For EU IDs 1a, 2a, 4, 5a, and 8, burn only gas as fuel. In each operating report under Condition 32, indicate whether each of these emissions units burned only gas during the period covered by the report. Report under Condition 31 if any fuel other than gas is burned in any of these emissions units.

7.5 For EU ID 66, monitor, record, and report in accordance with Condition 11.

Visible Emissions Monitoring, Recordkeeping, and Reporting (MR&R)

Liquid Fuel-Burning Equipment

8. Visible Emissions Monitoring. When required by Condition 7.2, or in the event of replacement[2] during the permit term, the Permittee shall observe the exhausts of EU IDs 3a and 6 for visible emissions using either the Method 9 Plan under Condition 8.2 or the Smoke/No Smoke Plan under Condition 8.3.

8.1 The Permittee may change the visible emissions monitoring plan for an emissions unit any time unless prohibited from doing so by Condition 8.4.

[1] For EU IDs 3a and 6, significant thresholds under 18 AAC 50.326(e) are reached at 800 and 900 hours per 12-month rolling period, respectively.

[2] *"Replacement"*, as defined in 40 C.F.R. 51.166(b)(32).

8.2 **Method 9 Plan.** For all observations in this plan, observe emissions unit exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations.[3]

a. First Method 9 Observation. Except as provided in Condition 8.4c(ii), observe the exhaust of EU IDs 3a and 6 according to the following criteria:

(i) For any unit, observe emissions unit exhaust within 14 calendar days after changing from the Smoke/No Smoke Plan of Condition 8.3.

(ii) For any unit replacement, observe exhaust within 60 days of the newly installed emissions unit becoming fully operational.[4] Except as provided in Condition 8.2e, after the First Method 9 observation:

(A) For EU IDs 3a and 6, comply with Condition 7.2, as applicable.

(iii) For each of EU IDs 3a and 6, observe the exhaust of the emissions unit within 30 days after the end of the calendar month during which monitoring was triggered under Condition 7.2; or for an emissions unit with intermittent operations, within the first 30 days during the unit's next scheduled operation.

b. Monthly Method 9 Observations. After the first Method 9 observation conducted under Condition 8.2a, perform observations at least once in each calendar month that the emissions unit operates.

c. Semiannual Method 9 Observations. After at least three monthly observations under Condition 8.2b, unless a six-consecutive-minute average opacity is greater than 15 percent and one or more individual observations are greater than 20%, perform semiannual observations

(i) no later than seven months, but not earlier than five months after the preceding observation; or

(ii) for an emissions unit with intermittent operations, during the next scheduled operation immediately following seven months after the preceding observation.

d. Annual Method 9 Observations. After at least two semiannual observations under Condition 8.2c, unless a six-consecutive-minute average opacity is greater than 15 percent and one or more individual observations are greater than 20 percent, perform actual observations

(i) no later than 12 months, but not earlier than 10 months, after the preceding observation; or

[3] Visible emissions observations are not required during emergency operations.

[4] *"Fully operational"* means completion of all functionary checks and commissioning after unit installation. *"Installation"* is complete when the unit is ready for functionary checks to begin.

(ii) for an emissions unit with intermittent observations, during the next schedule operation immediately following 14 months after the preceding observation.

e. Increased Method 9 Frequency. If a six-consecutive-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more individual observations are greater than 20 percent, then increase or maintain the observation frequency for that emissions unit to at least monthly intervals as described in Condition 8.2b, and continue monitoring in accordance with the Method 9 Plan.

8.3 **Smoke/No Smoke Plan.** Observe the emissions unit exhaust for the presence or absence of visible emissions, excluding condensed water vapor.

a. Initial Monitoring Frequency. Observe the emissions unit exhaust during each calendar day that the emissions unit operates for a mininum of 30 days.

b. Reduced Monitoring Frequency. If the emissions unit operates without visible emissions for 30 consecutive operating days as required in Condition 8.3a, observe the emissions unit exhaust at least once in every calendar month that the emissions unit operates.

c. Smoke Observed. If visible emissions are observed, comply with Condition 8.4.

8.4 **Corrective Actions Based on Smoke/No Smoke Observations.** If visible emissions are present in the emissions unit exhaust during an observation performed under the Smoke/No Smoke Plan of Condition 8.3, then the Permittee shall begin the Method 9 Plan of Condition 8.2 or:

a. Initiate actions to eliminate visible emissions from the emissions unit within 24 hours of the observation;

b. Keep a written record of the starting date, the completion date, and a description of the actions taken to reduce visible emissions; and

c. After completing the actions required under Condition 8.4a,

(i) conduct smoke/no smoke observations in accordance with Condition 8.3:

(A) at least once per day for the next seven operating days and, if applicable, until the initial 30-day observation period of Condition 8.4a is completed; and

(B) continue as described in Condition 8.3b; or

(ii) if subsequent visible emissions are observed under the schedule of Condition 8.4c(i)(A), then observe the emissions unit exhaust using the Method 9 Plan unless the Department gives written approval to resume observations under the Smoke/No Smoke Plan. After observing visible emissions and making observations under the Method 9 Plan, the Permittee may at any time take corrective action to eliminate visible emissions and restart the Smoke/No Smoke Plan under Condition 8.3a.

9. Visible Emissions Recordkeeping. The Permittee shall keep records as follows:

9.1 For all Method 9 observations,

a. the observer shall record the following:

(i) the name of the stationary source, emissions unit and location, emissions unit type, observer's name and affiliation, and the date on the Visible Emissions Observation Form in Section 10;

(ii) the time, estimated distance to the emissions location, sun location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate or best estimate, if unknown) on the sheet at the time opacity observations are initiated and completed;

(iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;

(iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emission Observation form in Section 10; and

(v) the minimum number of observations required by the permit; each momentary observation record shall be deemed to represent the average opacity of emissions for a 15-second period.

b. To determine the six-minute average opacity,

(i) divide the observations recorded on the record sheet into sets of 24 consecutive observations;

(ii) sets need not be consecutive in time and in no case shall two sets overlap;

(iii) for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; and

(iv) record the average opacity on the sheet.

c. Calculate and record the highest six- and 18-consecutive-miniute average opacities observed.

9.2 If using the Smoke/No Smoke Plan of Condition 8.3, record the following information in a written log for each observation and submit copies of the recorded information upon request of the Department:

a. the date and time of the observation;

b. the EU ID of the emissions unit observed;

c. whether visible emissions are present or absent in the emissions unit exhaust;

d. a description of the background to the exhaust during the observation;

e. if the emissions unit starts operation on the day of the observation, the startup time of the emissions unit;

f. name and title of the person making the observation; and

g. operating rate (load or fuel consumption rate or best estimate, if unknown).

9.3 The records required by Conditions 9.1 and 9.2 may be kept in electronic format.

10. Visible Emissions Reporting. The Permittee shall report as follows:

10.1 Include in each operating report required under Condition 32 for the period covered by the report

a. which visible emissions plan of Condition 8 was used for each emissions unit; if more than one plan was used, give the time periods covered by each plan;

b. for all Method 9 Plan observations:

(i) copies of the observation results (i.e., opacity observations) for each emissions unit, except for the observations the Permittee has already supplied to the Department; and

(ii) a summary to include:

(A) number of days observations were made;

(B) highest six-consecutive- and 18-consecutive-minute average opacities observed; and

(C) dates when one or more observed six-consecutive-minute average opacities were greater than 20 percent;

c. for each emissions unit under the Smoke/No Smoke Plan, the number of days that smoke/no smoke observations were made and which days, if any, that visible emissions were observed; and

d. a summary of any monitoring or recordkeeping under Conditions 8 and 9 that was not done.

10.2 Report under Condition 31:

a. the results of Method 9 observations that exceeded 20 percent average opacity for any six-consecutive-minute period; and

b. if any monitoring under Condition 8 was not performed when required, report within three days of the date that the monitoring was required.

Flares

11. Visible Emissions MR&R. The Permittee shall monitor, record, and report as follows:

11.1 Observe flare events[5] on EU ID 66 for visible emissions following 40 C.F.R. 60, Appendix A-4, Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations according to the following schedule:

a. Conduct an initial visible emissions observation within 12 months of the first flare event after becoming fully operational.

b. Conduct subsequent visible emissions observations within 14 months of, but not earlier than three months after, the preceding flare event visible emissions observation.

c. If there are no flare events that meet the requirements of Condition 11.1a or 11.1b, the Permittee shall observe the next daylight flare event.

11.2 Record the following information for observed flare event:

a. the flare EU ID number;

b. results of the Method 9 observations;

c. reason for flaring;

d. date, beginning and ending time of event; and volume of gas flared.

11.3 The records required by Condition 11.2 may be kept in electronic format.

11.4 Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available.

11.5 Include the following in the operating report required by Condition 32 for the period covered by the report

a. copies of the records required by Condition 11.2; and

b. if the annual flare event observation required by Condition 11.1a or 11.6b has not been fufilled for the year and/or monitoring of a flare event is postponed, an explanation of the reason the event was not monitored.

11.6 Report under Condition 31:

[5] For the purposes of this permit, a *"flare event"* is flaring of gas during daylight for greater than one hour as a result of scheduled release operations: i.e., maintenance or well testing activities. It does not include non-scheduled release operations; i.e., process upsets, emergency flaring, or de-minimis venting of gas incidental to normal operations.

a. whenever the visible emissions standard in Condition 7 is exceeded; or

b. the monitoring required under Condition 11.1 is not completed, except as allowed under Condition 11.4.

11.7 If no flare events are monitored during a certification period, the Permittee shall certify compliance under Condition 32 with the visible emission standards in Condition 7 based on reasonable inquiry.

Particulate Matter (PM) Emissions Standard

12. Industrial Process and Fuel-Burning Equipment PM Emissions. The Permittee shall not cause or allow particulate matter emitted from EU IDs 1a, 2a, 3a, 4, 5a, 6, 8, 66, and 73 listed in Table 1 and Table 2 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

12.1 For EU IDs 3a and 6, as long as actual emissions from the emissions unit are less than the significant emissions thresholds listed in 18 AAC 50.326(e) during any consecutive 12-month period, certify in each operating report under Condition 32, compliance with the PM emissions standard based on reasonable inquiry. Otherwise, comply with Condition 12.2.

12.2 The Permittee shall report in the operating report under Condition 32 if any of EU IDs 3a and 6 reaches any of the significant emissions thresholds and monitor, record, and report in accordance with Conditions 13 through 15 for the remainder of the permit term for that emissions unit.

12.3 For each boiler/heater included as EU ID 73, certify in each operating report required under Condition 32, compliance with the PM standard based on reasonable inquiry.

12.4 For EU IDs 1a, 2a, 4, 5a, and 8, the Permittee shall comply with Condition 7.4.

12.5 For EU ID 66, the Permittee shall comply with Condition 11.

PM MR&R

Liquid Fuel-Burning Engines

13. PM Monitoring. The Permittee shall conduct source tests on EU IDs 3a and 6 (when required by Condition 12.2) to determine the concentration of PM in the exhaust of each emissions unit as follows:

13.1 If the results of any Method 9 observation conducted under Condition 8.2 for any of EU IDs 3a and 6 is greater than the criteria in Condition 13.2a or 13.2b, the Permittee shall, within six months of that Method 9 observation, either:

a. take corrective action and observe the emissions unit exhaust under load conditions comparable to those when the criteria were exceeded, following 40 C.F.R. 60, Appendix A-4 Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations, to show that emissions are no longer greater than the criteria of Condition 13.2; or

b. except as exempted in Condition 13.4, conduct a PM source test according to requirements set out in Section 8.

13.2 Take corrective action or conduct a PM source test, in accordance with Condition 13.1, if any Method 9 observation under Condition 8.2 results in an 18-minute average opacity greater than

a. 20 percent for an emissions unit with an exhaust stack diameter that is equal to or greater than 18 inches; or

b. 15 percent for an emissions unit with an exhaust stack diameter that is less than 18 inches, unless the Department has waived this requirement in writing.

13.3 During each one-hour PM source test run under Condition 13.2b, observe the emissions unit exhaust for 60 minutes in accordance with Method 9 and calculate the highest 18-consecutive-minute average opacity measure during each one-hour test run. Submit a copy of these observations with the source test report.

13.4 The PM source test requirements in Condition 13.1b are waved for an emissions unit if

a. a PM source test on that unit has shown compliance with the PM standard during this permit term; or

b. corrective action was taken to reduce visible emissions and two consecutive 18-minute Method 9 visible emissions observations (as described in Condition 8.2) conducted thereafter within a six-month period show visible emissions less than the threshold in Condition 13.2.

14. PM Recordkeeping. The Permittee shall comply with the following:

14.1 Within 30 calendar days of exceeding the thresholds in 18 AAC 50.326(e), the Permittee shall record the exhaust stack diameters of EU IDs 3a and 6, as applicable.

14.2 Keep records of the results of any source test and visible emissions observations conducted under Condition 13.

15. PM Reporting. The Permittee shall report as follows:

15.1 Notify the Department of any Method 9 observation results that are greater than the threshold of either Condition 13.2a or 13.2b within 30 days of the end of the month in which the observations occurred. Include the dates, EU ID(s), and results when an observed 18-minute average opacity was greater than an applicable threshold in Condition 13.2.

15.2 In each operating report under Condition 32, include:

a. a summary of the results of an PM source test and visible emissions observations conducted under Condition 13; and

b. copies of any visible emissions observation results greater than the thresholds of Condition 13.2, if they were not already submitted.

15.3 Report the stack diameter(s) of EU IDs 3a and 6 in the next operating report under Condition 32 following the dateline in Condition 14.1 for collecting the stack diameter records.

15.4 Report in accordance with Condition 31:

a. any time the results of a PM source test exceed the PM emissions standard in Condition 12; or

b. if the requirements under Condition 13.1 were triggered and the Permittee did not comply on time with either Condition 13.1a or 13.1b. Report the deviation within 24 hours of the date compliance with Condition 13.1 was required.

Sulfur Compound Emissions Standard

16. Sulfur Compound Emissions. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO_2, from EU IDs 1a, 2a, 3a, 4, 5a, 6, 8, 66, and 73 listed in Table 1 and Table 2 to exceed 500 ppm averaged over three hours.

Sulfur Compound Emissions MR&R

17. For EU IDs 1a, 2a, 4, 5a, 8, 66, and 73 (portable heaters), to ensure compliance with Condition 16, the Permittee shall comply with the fuel gas sulfur content limit and associated MR&R requirements as follows:

17.1 For EU IDs 1a, 2a, 4, and 5a, comply with Condition 26.1.

17.2 For EU IDs 8, 66, and 73 (portable heaters), comply with Conditions 22.2a and 22.2b. Report as excess emissions, in accordance with Condition 31, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 16.

18. For EU IDs 3a and 6, to ensure compliance with Condition 16, the Permittee shall comply with the fuel sulfur content limit and associated MR&R requirements in Condition 26.2.

Section 4 Ambient Air Quality Protection Requirements

19. To protect the annual NO_2; the 1-hour, 3-hour, and 24-hour and annual SO_2; the 24-hour PM_{10}; and the annual $PM_{2.5}$ Alaska Ambient Air Quality Standards (AAAQS), the Permittee shall operate the equipment identified in Table 2 as described below:

19.1 **Cumulative Nonroad Engine (NRE) Limit.**[6] The NREs may be similar to or smaller than the equipment identified in Table 2. The cumulative NRE rating shall not exceed 7,635 operating brake horsepower (bhp) except during startup, shutdown, and maintenance activities for periods not to exceed one hour per calendar day. Monitor, record, and report as follows:

a. Maintain a NRE log onsite and have it available for inspection upon request. For each NRE at the stationary source, record in the log the following:

(i) During drilling, testing/casing, or cementing operations, record

(A) the type of operation;

(B) the start time and date of the operations; and

(C) the stop time and date of the operations.

(ii) During other operations (not including drilling, testing/casing or cementing), record

(A) the make, model, serial number, and rated capacity (bhp); and

(B) dates and times of arrival, startup, shutdown, maintenance, and removal of the NRE.

b. Calculate and determine the highest total combined NREs' rated capacity by summing the rated capacity of each NRE at the stationary source for each time a new NRE is added or removed.

c. Include in each operating report under Condition 32, a list of all NREs that operated during the reporting period, and corresponding operating data recorded in accordance with Conditions 19.1a and 19.1b.

d. Report in accordance with Condition 31 whenever the cumulative NRE rating exceeds the limit in Condition 19 as determined by a calculation under Condition 19.1b, or any of the requirements of Conditions 19.1a through 19.1c are not met.

20. To protect the 24-hour PM_{10} AAAQS, and the 1-hour, 3-hour, and 24-hour SO_2 AAAQS, the Permittee shall limit the total fuel gas consumption of EU ID 66 to no more than 25 (MMscf/d). Monitor, record, and report as follows:

[6] Nonroad engines as defined in 40 C.F.R. 1068.30.

20.1 Install, maintain, and operate non-resettable fuel gas flow meters on EU ID 66, accurate to within ±5 percent.

20.2 Record the fuel gas flow meter reading at the end of each day.

20.3 Calculate and report the total volume of gas consumed during the previous day.

20.4 Include in each operating report under Condition 32, copies of the records required by Conditions 20.2 and 20.3.

20.5 Report in accordance with Condition 31 if the total volume of gas calculated under Condition 20.3 exceeds the limit in Condition 20, or any of the requirements of Conditions 20.1 through 20.4 are not met.

21. To protect the annual NO_2, SO_2, and $PM_{2.5}$ AAAQS, the Permittee shall limit the cumulative fuel gas consumption of EU ID 66 to no more than 250 MMscf per rolling 12-month period. Monitor, record, and report as follows:

21.1 By the 15th of each month, calculate and record the total volume of gas consumed by EU ID 66 during the previous calendar month and cumulative volume of gas consumed by EU ID 66 per rolling 12-month period using the fuel gas flow meters in Condition 20.1.

21.2 Include in each operating report under Condition 32, copies of the records required by Condition 21.1.

21.3 Report in accordance with Condition 31 if the rolling 12-month cumulative fuel consumption calculated under Condition 21.1 exceeds the limit in Condition 21, or any of the requirements of Condition 21.1 or 21.2 are not met.

22. To protect the 1-hour, 3-hour, 24-hour, and annual SO_2 AAAQS, the Permittee shall operate the equipment listed in Table 2 as follows:

22.1 **Liquid Fuel Sulfur Content Limit.** Burn all fuels with sulfur content not to exceed 15 ppmw (ULSD[7]) in all liquid fuel-burning EUs (including NREs).

a. Clearly label fuel tank(s) for the liquid fuel-burning EUs as "ULSD Only".

b. For each shipment of fuel, keep receipts that specify fuel grade, date, and amount.

c. Include in each operating report under Condition 32, copies of the records required by Condition 22.1b.

d. Report in accordance with Condition 31 whenever the sulfur content of the liquid fuel burned in any EU exceeds the limit in Condition 22.1, or any of the requirements of Conditions 22.1a through 22.1c are not met.

22.2 **Fuel Gas Sulfur Content Limit.** Burn only gaseous fuels with a sulfur content not to exceed 250 ppmv in EU ID 66.

[7] *"ULSD"* is ultra-low sulfur diesel.

a. Analyize a representive sample of the fuel gas semiannualy to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228, or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) and 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

b. Keep records of the semiannual sulfur content analysis required under Condition 22.2a and include copies of the records with each operating report required by Condition 32 for the period covered by the report.

c. Report in accordance with Condition 31 whenever the fuel gas sulfur content exceeds the limit in Condition 22.2, or any of the requirements of Condition 22.2a or 22.2b are not met.

Section 5 Owner Requested Limits (ORLs)

Limits to Avoid Title V Permitting under 18 AAC 50.326

23. The Permittee shall comply with Condition 21 to limit VOC and CO emissions from EU ID 66 to no more than 74.8 TPY and 40.7 TPY, respectively.

Limits to Avoid Classification under 18 AAC 50.502(c)(1)

24. **NO_X Limit, EU IDs 3a and 6.** The Permittee shall limit the NO_X emissions from EU IDs 3a and 6 to less than 14.9 TPY by limiting the operation of each of EU IDs 3a and 6 to no more than 4,000 hours per rolling 12-month period. Monitor, record, and report as follows:

24.1 Record the total hours of operation for each of EU IDs 3a and 6 using dedicated hour meters for each calendar month the units operate.

24.2 By the 15th day of each calendar month, calculate and record the rolling 12-month total operating hours for each of EU IDs 3a and 6 for the previous month.

24.3 Include in the operating report under Condition 32, the records required by Condition 24.2 for each month of the reporting period.

24.4 Report in accordance with Condition 31 any time the rolling 12-month total operating hours for any of EU IDs 3a and 6 exceeds the limit in Condition 24, or any of the requirements of Conditions 24.1 through 24.3 are not met.

25. **NO_X Limit, EU IDs 1a and 2a.** The Permittee shall limit the NO_X emissions from EU IDs 1a and 2a to no more than 3.9 TPY by using an emPact control system. Monitor, record, and record as follows:

25.1 Install, maintain, and operate the emPact control systems in accordance with the manufacturer's written instructions.

25.2 Keep records of any maintenance for a minimum of 5 years. The records may be kept in electronic format.

25.3 Keep a copy of the manufacturer's written maintenance and operation instructions.

25.4 Report in accordance with Condition 31 if the limit in Condition 25 is exceeded, or any of the requirements in Conditions 25.1 through 25.3 are not met.

26. **SO_2 Limit, EU IDs 1a – 6.** The Permittee shall limit the SO_2 emissions from EU IDs 1a – 6a to no more than 0.95 TPY as follows:

26.1 **Fuel Gas Sulfur Content Limit, EU IDs 1a, 2a, 4, and 5a.** The Permittee shall ensure the fuel gas sulfur content of EU IDs 1a, 2a, 4, and 5a does not exceed 2,000 grains/MMscf.[8]

a. Obtain and keep records of the certified statement from the natural gas supplier that shows the sulfur content of the natural gas burned in the EUs.

[8] EPA AP-42 emission factors in Table 1.4-2 used for calculating SO_2 emissions from natural gas combustion.

b. Include in the operating report under Condition 32, the records required by 26.1a.

c. Report in accordance with Condition 31 if the limit in Condition 26.1 is exceeded or any of the requirements in Condition 26.1a or 26.1b are not met.

26.2 **Liquid Fuel Sulfur Content Limit, EU IDs 3a and 6.** The Permittee shall ensure the fuel sulfur content of EU IDs 3a and 6 does not exceed 15 parts per million by weight (ppmw).

a. Obtain and keep records of the certifed statement from the diesel fuel supplier that shows the sulfur content of the diesel fuel burned in the EUs.

b. Include in the operating report under Condition 32, the records required by Condition 26.2a.

c. Report in accordance with Condition 31 if the limit in Condition 26.2 is exceeded, or any of the requirements in Condition 26.2a or 26.2b are not met.

Section 6 Recordkeeping, Reporting, and Certification Requirements

27. Recordkeeping Requirements. The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:

27.1 Copies of all reports and certifications submitted pursuant to this section of the permit; and

27.2 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.

28. 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.

28.1 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.

29. 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.

29.1 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/.

30. 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.

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

31.1 **Excess Emissions Reporting.** Except as provided in Condition 35, 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 31.1d.

d. Report all other excess emissions not described in Conditions 31.1a, 31.1b, and 31.1c 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 32 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.

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

a. Report all other permit deviations within 30 days after the end of the month during which the deviation occurred or as part of the next routine operating report in Condition 32 for permit deviations that occurred during the period covered by the report, whichever is sooner.

31.3 **Reporting Instructions.** When reporting either excess emissions or permit deviations, the Permittee shall report using the Department's online form for all such submittals. 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 11 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/.

32. Operating Reports. During the life of this permit[9], the Permittee shall submit to the Department an operating report in accordance with Conditions 28 and 29 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.

32.1 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.

32.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 32.1, 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

32.3 When excess emissions or permit deviation reports have already been reported under Condition 31 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.

33. Regional Haze Visibility Protection Area. The Permittee shall comply as follows:

[9] *"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.

33.1 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 effects 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 specifications.

33.2 For EU ID 8, include a best estimate of the projected equipment life of the significant emissions unit, if known, in the first operating report required in Condition 32 after the emissions unit is installed.

34. Annual Affirmation. The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 28 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.

35. 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.

35.1 **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 35.

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 35; or

(ii) the Department notifies the Permittee that it has found a violation of Condition 35.

35.2 **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 35; and

d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

35.3 **Reporting.** The Permittee shall report as follows:

a. With each stationary source operating report under Condition 32, 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 31.

36. Triennial 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, NH_3, NO_X, PM_{10}, $PM_{2.5}$, SO_2, VOC and lead (Pb) and lead compounds, as follows:

36.1 For reporting under Condition 36, the Permittee shall report the annual emissions and the required data elements under Condition 36.2 every third year for the previous calendar year as scheduled by the EPA.[10]

36.2 For each emissions unit and the stationary source, include in the report the required data elements[11] 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.

36.3 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/.

[10] 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 2026 is due April 30, 2027, triennial emission inventory report for 2029 is due April 30, 2030, etc.).

[11] 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.

37. Consistency of Reporting Methodologies. Regardless of permit classification, 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.

37.1 For the purposes of reporting actual or assessable emissions required under Condition 36 and Condition 5.2, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.

Section 7 Standard Permit Conditions

38. 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

38.1 an enforcement action; or

38.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.

39. 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.

40. 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.

41. 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.

42. The permit does not convey any property rights of any sort, nor any exclusive privilege.

43. 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

43.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;

43.2 have access to and copy any records required by this permit;

43.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and

43.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 8 General Source Test Requirements

44. Required 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.

45. Operating Conditions. Unless otherwise specified by an applicable amendment or test method, the Permittee shall conduct source testing

45.1 at a point or points that characterize the actual discharge into the ambient air; and

45.2 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.

46. Reference Test Methods. The Permittee shall use the following references for test methods when conducting source testing for compliance with this permit:

46.1 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 10 of this permit to record data.

46.2 Source testing for emissions of PM_{10} 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.

46.3 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.

47. Excess Air Requirements. To determine compliance with this permit, standard exhaust gas volume 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).

48. Test Exemption. The Permittee is not required to comply with Conditions 50, 51, and 52 when the exhaust is observed for visible emissions by Method 9 Plan (Condition 8.2).

49. 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 dateline only if the extension is approved in writing by the Department's appropriate division director or designee.

50. 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 44 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 within resubmitting the plan.

51. 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.

52. Test Reports. Within 60 days of completing a source test, the Permittee shall submit one certified copy of the results in the format set out in the *Source Test Report Online*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in Condition 28. 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

Date	Document Details
October 31, 2025	Application received.
March 16, 2026	Preliminary permit and technical analysis report (TAR) sent to Permittee for technical review.
April 1, 2026	Preliminary permit and TAR technical review received from Permittee.
April 10, 2026	Preliminary permit and TAR sent for public notice.

Section 10 Visible Emissions Forms

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	
Emission Unit Location		
City	State	Zip
Phone # (Key Contact)	Stationary Source ID Number	
Process Equipment	Operating Mode	
Control Equipment	Operating Mode	
Describe Emission Point/Location		
Height above ground level	Height relative to observer	Clinometer Reading
Distance From Observer Start End	Direction From Observer Start End	
Describe Emissions & Color Start	End	
Visible Water Vapor Present? No / Yes	If yes, determine approximate distance from the stack exit to where the plume was read	
Point in Plume at Which Opacity Was Determined		
Describe Plume Background Start End	Background Color Start End	
Sky Conditions: Start	End	
Wind Speed Start End	Wind Direction From Start End	
Ambient Temperature	Wet Bulb Temp	RH percent

SOURCE LAYOUT SKETCH: 1 Stack or Point Being Read 2 Wind Direction From 3 Observer Location 4 Sun Location 5 North Arrow 6 Other Stacks

Additional Information:

I have received a copy of these opacity observations Print Name: Signature:	
Title	Date

Observation Date	Start Time	End Time			
Sec / Min	0	15	30	45	Comments
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
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29					
30					

Range of Opacity:	
Minimum	Maximum
Print Observer's Name	
Observer's Signature	Date
	Observer's Affiliation:
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%:	
In compliance with six-minute opacity limit? (Yes or No)	Highest 18-Consecutive –Minute Average Opacity (%)(engines and turbines only)

Average Opacity Summary:

Set Number	Time			Opacity		Comments
	Start	End		Sum	Average	

Section 11 Notification Form[12]

Kitchen Lights Unit
Stationary Source Name

AQ0982MSS12
Air Quality Permit Number

Furie Operating Alaska, LLC
Company Name

When did you discover the Excess Emissions/Permit Deviation?

Date: ____/____/____ Time: ____:____

When did the event/deviation occur?

Begin: Date: ____/____/____ Time: ____:____ (please use 24-hr clock)

End: Date: ____/____/____ Time: ____:____ (please use 24-hr clock)

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

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

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

☐ Excess Emissions - Complete Section 1 and Certify

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

☐ Deviation from Permit Conditions - Complete Section 2 and Certify

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

☐ Deviation from COBC[13], CO[14], or Settlement Agreement - Complete Section 2 and Certify

[12] Revised as of July 22, 2020.
[13] Compliance Order By Consent
[14] 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.):

☐Start Up/Shut Down
☐Natural Cause (weather/earthquake/flood)
☐Control Equipment Failure
☐Scheduled Maintenance/Equipment Adjustments
☐Bad fuel/coal/gas
☐Upset Condition
☐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 _____%
- ☐ Control Equipment Down
- ☐ Emission Limit Exceeded
- ☐ Flaring
- ☐ Other**:** _____
- ☐ Venting _____(gas/scf)
- ☐ Fugitive Emissions
- ☐ Marine Vessel Opacity

(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 (<u>go to end of form</u>)

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 28.)*

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)]