

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY CONTROL MINOR PERMIT

**Permit No.:** AQ0198MSS01

**Date:** Final – October 5, 2009

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0198MSS01 to the Permittee listed below.

**Permittee:** Alaska Soil Recycling (Division of Anchorage Sand and Gravel Co., Inc.)  
1040 O'Malley Road  
Anchorage, AK 99515

**Owner/Operator:** Same as Permittee

**Stationary Source:** Mobile Soil Remediation Unit

**Location:** UTM Zone 6; Northing 6,790,889; Easting 347,634

**Physical Address:** 2301 Spar Avenue, Anchorage, AK 99501

**Permit Contact:** Brad Quade (907) 349-3333

**Project :** Minor Permit to Replace the Operating Permit

This minor permit is issued under 18 AAC 50.502(b)(2) and 18 AAC 50.508(6). This permit satisfies the obligation of the Permittee to obtain a minor permit under the provision. The permittee is no longer required to comply with the conditions of the expired operating permit No. 198TVP01. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this minor permit. This permit authorizes the Permittee to operate under the terms and conditions of this permit, and as described in the original permit application and subsequent application supplements listed in Section 10 except as otherwise specified in this permit.



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John F. Kuterbach  
Manager, Air Permits Program

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## Abbreviations/Acronyms

AAC	Alaska Administrative Code
ADEC	Alaska Department of Environmental Conservation
AS	Alaska Statutes
ASR	Alaska Soil Recycling
CEMS	Continuous Emission Monitoring System
C.F.R.	Code of Federal Regulations
PTE	Potential to Emit
SOB	Statement of Basis
SRU	Soil Remediation Unit
TAR	Technical Analysis Report
WC	Water Column

### Units and Measures

dscf	dry standard cubic foot
F	Fahrenheit
gr./dscf	grains per dry standard cubic foot (1 pound = 7,000 grains)
HP	Horse Power
kW	kiloWatts
kW-e	kilowatts electric <sup>1</sup>
lbs	pounds
MMBtu	million British Thermal Units
ppmv	parts per million by volume
psig	pounds per square inch gauge
scfm	standard cubic feet per minute
tpy	tons per year

### Pollutants

CO	Carbon Monoxide
H <sub>2</sub> S	Hydrogen Sulfide
NO <sub>x</sub>	Oxides of Nitrogen
PM-10	Particulate Matter with an aerodynamic diameter less than 10 microns
S	Sulfur
SO <sub>2</sub>	Sulfur Dioxide
VOC	Volatile Organic Compound

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<sup>1</sup> kW-e refers to rated generator electrical output rather than engine output

## Section 1 Emission Unit Inventory and Description

1. **Emission Unit Authorization.** The Permittee is authorized to operate the emission unit listed in Table 1. Except as noted elsewhere in this permit, the information in Table 1 is for identification purposes only. The specific descriptions do not restrict the Permittee from replacing an emission unit identified in Table 1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement emission unit, including any applicable minor or construction permit requirements.

**Table 1 – Emission Unit Inventory**

EU ID	Unit Name	Unit Description	Rating/size	Installation Date
1	Thermotech Systems Model No. 625 Mobile Soil Remediation Unit	Mobile Soil Remediation Unit	25 tons/hr	1992
	<i>Primary Treatment Unit</i> - Rotary Drum - Burner - Air Compressor (for baghouse) - Genco Model 232 Baghouse - Teflon coated Nomex bag filters	Rotary drum Burner Air Compressor  Baghouse Filters	25 tons/hr 25 MMBtu/hr; 1500 SCFM @ 24" WC 25 HP discharge pressure 100 psi  Air/cloth ratio 4.8:1	
	<i>Secondary Treatment Unit</i> - Thermal Oxidizer Burner and Blower - Exhaust Fan (induced draft) - Mixer cooler water pump - CM 6000-24 Continuous Emissions Monitoring System (CEMS) consisting of: -Servomex 1400A Oxygen Monitor -TECO 48 Carbon Monoxide Monitor	Oxidizer burner and blower Exhaust fan Water pump	17 MMBtu/hr; 2500 SCFM @ 24" WC  12000 SCFM @ 16" WC 15 GPM – 80 psig	

Table 1 Notes:

WC - means water column

SCFM – means standard cubic feet per minute

GPM – means gallons per minute

psig – means pounds per square inch gauge

## **Section 2 Assessable Emissions**

2. **Assessable Emissions.** The Permittee shall pay to the Department an annual emission fee based on the stationary source's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of
  - 2.1 the stationary source's assessable potential to emit of 52 tpy; or
  - 2.2 the stationary source's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12-month period approved in writing by the Department, when demonstrated by:
    - (i) an enforceable test method described in 18 AAC 50.220;
    - (ii) material balance calculations;
    - (iii) emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
    - (iv) other methods and calculations approved by the Department.
3. **Assessable Emission Estimates.** Emission fees will be assessed as follows:
  - 3.1 no later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or
  - 3.2 if no estimate 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 forth in Condition 2.1.

### **Section 3 State Emissions Standards**

#### **Industrial Process and Fuel Burning Equipment**

4. **Visible Emissions Standard.** Do not cause or allow visible emissions, excluding condensed water vapor, emitted from Emission Unit (EU) ID 1 listed in Table 1 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.
  
5. **Visible Emissions Monitoring.** The Permittee shall observe the exhaust of EU ID 1 for visible emissions using either the Method 9 Plan under Condition 5.1 or the Smoke/No-Smoke Plan under Condition 5.2. The Permittee may change visible-emissions plans for an emission unit at any time unless prohibited from doing so by Condition 5.3. The Permittee may elect to continue a visible emission monitoring schedule in effect from the previous permit at the time this permit is issued if applicable.

5.1 **Method 9 Plan.** For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.

- a. **First Method 9 Observation.** For EU ID 1, observe exhaust for 18 minutes within six months after the issue date of this permit. For any unit, observe exhaust for 18 minutes within 14 calendar days after changing from the Smoke/No-Smoke Plan of Condition 5.2. For any units replaced during the term of this permit, observe exhaust for 18 minutes within 30 days of startup.
  
- b. **Monthly Method 9 Observations.** After the first Method 9 observation, perform 18-minute observations at least once in each calendar month that an emission unit operates.
  
- c. **Semiannual Method 9 Observations.** After observing emissions for three consecutive operating months under Condition 5.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, perform 18-minute observations at least semiannually.

Semiannual observations must be taken between four and seven months after the previous set of observations.

- d. **Annual Method 9 Observations.** After at least two semiannual 18-minute observations, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, perform 18-minute observations at least annually.

Annual observations must be taken between 10 and 13 months after the previous observations

- e. Increased Method 9 Frequency. If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that emission unit to at least monthly intervals, until the criteria in Condition 5.1c for semiannual monitoring are met.

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

- a. Initial Monitoring Frequency. Observe the exhaust during each calendar day that an emission unit operates.
- b. Reduced Monitoring Frequency. After the emission unit has been observed on 30 consecutive operating days, if the emission unit operated without visible smoke in the exhaust for those 30 days, then observe emissions at least once in every calendar month that an emission unit operates.
- c. Smoke Observed. If smoke is observed, either begin the Method 9 Plan of Condition 5.1 or perform the corrective action required under Condition 5.3.

5.3 **Corrective Actions Based on Smoke/No Smoke Observations.** If visible emissions are present in the exhaust during an observation performed under the Smoke/No Smoke Plan of Condition 5.2, then the Permittee shall either follow the Method 9 plan of Condition 5.1 or

- a. initiate actions to eliminate smoke from the source 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 smoke; and
- c. after completing the actions required under Condition 5.3a,
  - (i) take Smoke/No Smoke observations in accordance with Condition 5.2.
    - (A) at least once per day for the next seven operating days and until the initial 30 day observation period is completed; and
    - (B) continue as described in Condition 5.2b; or

- (ii) if the actions taken under Condition 5.3a do not eliminate the smoke, or if subsequent smoke is observed under the schedule of Condition 5.3c(i)(A), then observe the exhaust using the Method 9 Plan unless the Department gives written approval to resume observations under the Smoke/No Smoke Plan; after observing smoke and making observations under the Method 9 Plan, the Permittee may at any time take corrective action that eliminates smoke and restart the Smoke/No Smoke Plan under Condition 5.2a.

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

6.1 When using the Method 9 Plan of Condition 5.1,

a. the observer shall record

- (i) the name of the stationary source, emission unit and location, emission unit type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet in Section 8;
- (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) 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 Emissions Observation record in Section 8, and
- (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

- b. To determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet.

6.2 If using the Smoke/No Smoke Plan of Condition 5.2, 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. from Table 1, the ID of the emission unit observed;

- c. whether visible emissions are present or absent in the exhaust;
- d. a description of the background to the exhaust during the observation;
- e. if the emission unit starts operation on the day of the observation, the startup time of the source;
- f. name and title of the person making the observation; and
- g. operating rate (load or fuel consumption rate).

7. **Visible Emissions Reporting.** The Permittee shall report visible emissions as follows:

7.1 In each stationary source operating report under Condition 40, include for the period covered by the report:

- a. which visible-emissions plan of Condition 5 was used for each emission unit; if more than one plan was used, give the time periods covered by each plan;
- b. for each emission unit under the Method 9 Plan,
  - (i) copies of the observation results (i.e. opacity observations) for each emission unit that used the Method 9 Plan, 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-minute average observed; and
    - (C) dates when one or more observed six-minute averages were greater than 20 percent;
- c. for each emission unit under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed; and
- d. a summary of any monitoring or record keeping required under Conditions 5 and 6 that was not done;

7.2 report under Condition 40:

- a. the results of Method 9 observations that exceed an average of 20 percent opacity for any six-minute period; and
- b. if any monitoring under Condition 5 was not performed when required, report within three days of the date the monitoring was required.

8. **Particulate Matter Standard.** The Permittee shall not cause or allow particulate matter (PM) emitted from EU ID 1 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
9. **Particulate Matter Monitoring.** The Permittee shall conduct source tests on EU ID 1 to determine the concentration of PM in the exhaust of EU ID 1 as follows:
  - 9.1 Conduct a PM source test according to the requirements set out in Section 5 no later than 90 calendar days after any time corrective maintenance fails to eliminate visible emissions greater than the 20 percent opacity threshold for two or more 18-minute observations in a consecutive six-month period.
  - 9.2 During each one-hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the average opacity that was measured during each one-hour test run.
  - 9.3 The PM source test requirement in Condition 9.1 is waived for an emission unit if:
    - a. a PM source test during the most recent semiannual reporting period on that unit shows compliance with the PM standard since permit issuance, or
    - b. if a follow-up visible emission observation conducted using Method-9 during the 90 days shows that the excess visible emissions described in Condition 5.1e no longer occur.
10. **Particulate Matter Recordkeeping.** The Permittee shall keep records of the results of any PM testing and visible emissions observations conducted under Condition 9.
11. **Particulate Matter Reporting.** The Permittee shall report as follows:
  - 11.1 In each operating report required by Condition 40, include
    - a. the dates, EU ID, and results when an 18-minute opacity observation was greater than the applicable threshold criterion in Condition 5.1e.
    - b. a summary of the results of any PM testing and visible emissions observations conducted under Condition 9.
  - 11.2 Report as excess emissions, in accordance with Condition 39, any time the results of a source test for PM exceeds the PM emission limit stated in Condition 8.
12. **Sulfur Compound Emissions Standard.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from Unit ID 1 to exceed 500 parts per million (ppm) averaged over three hours.
  - 12.1 Monitoring – The Permittee shall **either**

- a. obtain a semiannual statement from the fuel supplier of the fuel gas H<sub>2</sub>S concentration in ppm; **or**
- b. analyze a representative sample of the fuel (semi)-annually 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 CFR 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

12.2 Recordkeeping - Keep records of the semiannual statement from the fuel supplier or the sulfur content analysis required under Conditions 12.1a or 12.1b.

12.3 Reporting -

- a. Report as excess emissions, in accordance with Condition 39, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 12.
- b. Include copies of the records required by Condition 12.2 with the stationary source operating report required by Condition 40 for the period covered by the report.

**Section 4 Conditions carried over from Permit 9521-AA006, and as revised in Operating Permit 198TVP01**

13. The Permittee shall treat soils which have only been contaminated with crude oil, petroleum distillates, fuel oil, lube oil, hydraulic oil, natural gas condensate, volatile organic compounds, or ethylene glycol. The Permittee shall not process any material that meets the definition of hazardous waste under 40 CFR 261 or 18 AAC 62.
  - 13.1 Describe the soil processed each day and report per Condition 40.
  - 13.2 Report permit deviations per Condition 39.
14. The Permittee shall preheat the baghouse to 250 degrees Fahrenheit (°F) for a minimum of ten minutes on daily startup and post heat for a minimum of two minutes before ceasing operation.
  - 14.1 Monitor and record the daily startup and post heat baghouse temperatures in °F.
15. The Permittee shall operate the EU ID 1 afterburner to obtain a minimum stack gas temperature of at least 1,500° F at all times, including baghouse pre- and post-heat periods.
  - 15.1 Monitor and record the temperature according to Condition 23.1c.
16. The Permittee shall operate EU ID 1 at a capacity no greater than the capacity for which source testing demonstrates compliance.
  - 16.1 Monitor, record and report according to Condition 17.
17. The Permittee shall process feed rates to determine compliance with the rate limits in Condition 16. The Permittee shall install, calibrate, operate, and maintain a continuous feed rate monitoring system for recording, on an hourly basis, the burning rate of the contaminated soil.
  - 17.1 Report per Condition 40:
    - a. hours operated per day;
    - b. tons of soil processed per day;
    - c. brief description of weather; and
    - d. total number of days operated per month.
  - 17.2 If any feed rate monitor is malfunctioning or non-operable for three or more consecutive days (consecutive 72 hour period), the Permittee shall notify the

Department indicating the cause of the failure and anticipated time required to repair or replace the instrument. Report excess emissions per Condition 39.

18. The Permittee shall maintain a minimum pressure drop range across the baghouse at all times for which source testing demonstrates compliance.
  - 18.1 Install  $\frac{3}{4}$  inch nominal pipe size manometer ports for measuring the gas side pressure drop across the baghouse.
    - a. Continuously monitor and record the pressure drop across the gas side of the control device and record representative values for each day of operation as stipulated in Condition 18.1b. Report excess emissions per Condition 39.
    - b. Report per Condition 40 the maximum, minimum, and daily average for each operating day. Report in inches of water column.
19. The Permittee shall have on-site new replacement bags for the baghouse equal to or greater than 10 percent of the total number of bags used in the baghouse. Replacement bags that are subsequently installed shall be replaced within 30 days. Report excess emissions per Condition 39 if the number of bags on-site drops below 10 percent.
20. The Permittee shall
  - 20.1 control all sources of fugitive emissions to prevent release of material beyond the property line of the stationary source, including, but not limited to:
    - a. aggregate piles;
    - b. aggregate and product conveyors;
    - c. load out hopper;
    - d. rotary drum;
    - e. emission control system; and
    - f. roadways under the control of the Permittee; and
  - 20.2 promptly repair any holes in ducts, shrouds, conveyors, or other equipment which contributes to release of fugitive dust.
21. The Permittee shall not commence soil remediation operations if a specific operation requires a Contaminated Sites Project Workplan as described in 18 AAC 75.327 until the Department has approved the workplan.
22. The Permittee shall perform a source test of EU ID 1's exhaust for PM and carbon monoxide (CO) to ascertain the concentrations and mass emission rates of PM and operation parameters using the methods specified in this condition. The tests do not need

to be conducted more than once every five calendar years, unless requested by the Department under Condition 25.

- 22.1 The Permittee shall determine PM emissions (gr/dscf and lb/hr) using Reference Method 5 specified in 40 CFR 60, Appendix A.
- 22.2 Determine CO (ppm corrected to 7% O<sub>2</sub>) using Reference Method 10 as specified in 40 CFR 60, Appendix A.
- 22.3 Conduct the source test at the maximum rate of the emission unit, or maximum anticipated operating rate in accordance with Reference Methods 1 – 5 as specified in 40 CFR 60, Appendix A.
- 22.4 Submit the source test plan, notification, and results in accordance with Conditions 31, 32, and 33.
- 22.5 Report the following information as part of the source test plan:
  - a. contaminated soil processing rate – tons/hr;
  - b. fuel gas consumption in scf;
  - c. age, type, and loading of bags – days, material, air/cloth ratio;
  - d. number of cleaning cycles during tests – cycle setting and duration;
  - e. exhaust flow – damper setting;
  - f. pressure drop across baghouse – inches water column;
  - g. average and maximum contamination level;
  - h. soil moisture content; and
  - i. sieve analysis.
- 22.6 Report under Condition 39 if the PM concentration from this source test for EU ID 1 results in a violation of the emission limit in Condition 8.
23. The Permittee shall operate EU ID1 in a manner such that the exhaust stack concentration of CO emitted from EU ID 1 does not exceed 100 ppm by volume, corrected to seven percent oxygen, one hour average based on five minute average measurements by the Continuous Emission Monitor System (CEMs).
  - 23.1 Install, calibrate, operate, and maintain a CEMS to measure and record the emissions of CO and oxygen (O<sub>2</sub>) through EU ID1 exhaust stack as stipulated below.

- a. The systems shall be installed and calibrated per 40 CFR 60, Appendix B, and Performance Specification 3 & 4. A Quality Assurance Plan shall satisfy the requirements of 40 CFR 60, Appendix F.
  - b. Record and report per Condition 40, for each monitor, the percentage of time or total hours per six-month period the CEMS was non-operational, for any reason, during the time the stationary source was processing material.
  - c. Monitor and record once per day the afterburner outlet temperature (°F). If the CO or the O<sub>2</sub> monitor is out of service or out of calibration for more than 30 minutes, the secondary combustion chamber outlet temperature shall be recorded every five minutes and shall be kept above 1500° F.
- 23.2 Certify each CEMS installed as required by Condition 13 in accordance with the procedures set out in 40 CFR Part 60, Appendix B, Performance Specifications 3 & 4, and submit a certification report as part of the source test report required by Condition 33.
24. The Permittee shall do the following for EU ID 1:
- 24.1 inspect every component of the control device prior to the first operation of EU ID 1 each year, and repair or replace any component which shows signs of deterioration;
  - 24.2 do not move or remove emission and process monitors required by this permit without prior Department approval;
  - 24.3 perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 24.4 keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
  - 24.5 keep a copy of either the manufacturer's or the operator's maintenance procedures.

## **Section 5 General Source Testing and Monitoring Requirements**

25. **Requested Source Tests.** In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.
26. **Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing
- 26.1 at a point or points that characterize the actual discharge into the ambient air; and
  - 26.2 at the maximum rated burning or operating capacity of the source or another rate determined by the Department to characterize the actual discharge into the ambient air.
27. **Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:
- 27.1 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9 and may use the form in Section 8 to record data.
  - 27.2 Source testing for emissions of total PM, sulfur compounds, nitrogen compounds, CO, 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.
  - 27.3 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Methods 201 or 201A and 202.
  - 27.4 Source testing for emissions of any pollutant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.
28. **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 source type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).
29. **Test Exemption.** The Permittee is not required to comply with Conditions 31, 32 and 33 when the exhaust is observed for visible emissions by Method 9 Plan (Condition 5.1) or Smoke/No Smoke Plan (Condition 5.2).

[18 AAC 50.345(a), 11/9/08]

30. **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.
31. **Test Plans.** Except as provided in Condition 29, 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 source 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 25 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 performed without resubmitting the plan.
32. **Test Notification.** Except as provided in Condition 29, at least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.
33. **Test Reports.** Except as provided in Condition 29, within 60 days after completing a source test, the Permittee shall submit two copies 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 additionally certify the results in the manner set out in Condition 36. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.
34. **Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in Condition 8, the three-hour average is determined using the average of three one-hour test runs.

## **Section 6 General Recordkeeping and Reporting Requirements**

### **Recordkeeping Requirements**

35. **Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:
- 35.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
  - 35.2 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 analyses;
    - d. the analytical techniques or methods used;
    - e. the results of such analyses; and,
    - f. the operating conditions as existing at the time of sampling or measurement.

### **Reporting Requirements**

36. **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 emission 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.
- 36.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if
- a. a certifying authority registered under AS 09.25.510 verifies that the electronic signature is authentic; and
  - b. the person providing the electronic signature has made an agreement, with the certifying authority described in Condition 36.1a, that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.

37. **Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall send an original and one copy of reports, compliance certifications, and other submittals required by this permit to **ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician.** The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, emission source test reports, or other records under a cover letter certified in accordance with Condition 36.
38. **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 and 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.
39. **Excess Emissions and Permit Deviation Reports.**
- 39.1 The Permittee shall report all emissions or operations that exceed or deviate from the requirements 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) 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 emission standard;
  - c. report all other excess emissions and permit deviations
    - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in Conditions 39.1c(ii) and 39.1c(iii);
    - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under Condition 39.1c(i); and
    - (iii) for failure to monitor, as required in other applicable conditions of this permit.

- 39.2 When reporting excess emissions or permit deviations, the Permittee must report using either the Department's on-line form, which can be found at <http://www.dec.state.ak.us/air/ap/site.htm> or <https://myalaska.state.ak.us/deca/air/airtoolsweb/>, or if the Permittee prefers, the form contained in Section 9 of this permit. The Permittee must provide all information called for by the form that is used.
- 39.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.
40. **Operating Reports.** The Permittee shall submit to the Department an original and two copies of an operating report 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.
- 40.1 The operating report must include all information required to be in operating reports by other conditions of this permit. The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, emission source test reports, or other records under a cover letter certified in accordance with Departmental submission requirements
- 40.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 40.1, either
- a. The Permittee shall identify
    - (i) the date of the deviation;
    - (ii) the equipment involved;
    - (iii) the permit condition affected;
    - (iv) a description of the excess emissions or permit deviation; and
    - (v) any corrective action or preventive measures taken and the date of such actions; or
  - b. When excess emissions or permit deviations have already been reported under Condition 39 the Permittee shall cite the date or dates of those reports.

## **Section 7 Terms to make Permit Enforceable**

41. 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
  - 41.1 an enforcement action; or
  - 41.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
42. 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.
43. 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.
44. 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.
45. The permit does not convey any property rights of any sort, nor any exclusive privilege.
46. 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
  - 46.1 enter upon the premises where an emission unit subject to the permit is located or where records required by the permit are kept;
  - 46.2 have access to and copy any records required by the permit;
  - 46.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
  - 46.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

## Section 8 Visible Emissions Forms

### Visible Emissions Field Data Sheet

Certified Observer: \_\_\_\_\_

Company &  
 Stationary  
 Source: \_\_\_\_\_

Location: \_\_\_\_\_

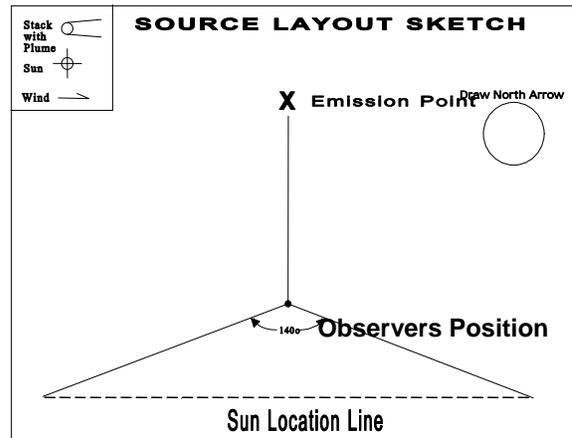
Test No.: \_\_\_\_\_ Date: \_\_\_\_\_

Emission Unit: \_\_\_\_\_

Production Rate/Operating  
 Rate: \_\_\_\_\_

Unit Operating Hours: \_\_\_\_\_

Hrs. of observation: \_\_\_\_\_



Clock Time	Initial				Final
Observer location					
Distance to discharge					
Direction from discharge					
Height of observer point					
Background description					
Weather conditions					
Wind Direction					
Wind speed					
Ambient Temperature					
Relative humidity					
Sky conditions: (clear, overcast, % clouds, etc.)					
Plume description:					
Color					
Distance visible					
Water droplet plume? (Attached or detached?)					
Other information					



## Section 9 ADEC Notification Form<sup>2</sup>

Stationary Source (Facility) Name	Air Quality Permit Number
Company Name	

**When did you discover the Excess Emissions/Permit Deviation?**

Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Time: \_\_\_\_\_ : \_\_\_\_\_

**When did the event/deviation occur?**

Begin Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Time: \_\_\_\_\_ : \_\_\_\_\_ (please use 24hr clock)

End Date: \_\_\_\_\_ / \_\_\_\_\_ / \_\_\_\_\_ Time: \_\_\_\_\_ : \_\_\_\_\_ (please use 24hr 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.
- Deviation from Permit Condition - Complete Section 2 and Certify
- Deviations from COBC, CO, or Settlement Agreement - Complete Section 2 and Certify

### Section 1. Excess Emissions

(a) Was the exceedance:  Intermittent or  Continuous

(b) Cause of Event (Check one that applies):

- Start Up /Shut Down
- Natural Cause (weather/earthquake/flood)
- Control Equipment Failure
- Scheduled Maintenance/Equipment Adjustment
- 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.**

(d) Emissions Units Involved:

Identify the emission unit 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.

Unit ID	Emission Unit Name	Permit Condition Exceeded/Limit/Potential Exceedance

<sup>2</sup> Revised as of August 20, 2008.

(e) Type of Incident (Please Check only one).

- Opacity \_\_\_\_\_ %     
  Venting \_\_\_\_\_ (gas/scf)     
  Control Equipment Down  
 Fugitive Emissions     
  Emission Limit Exceeded     
  Other:  
 Marine Vessel Opacity     
  Flaring
- 

(f) 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 one only box, corresponding with the section in the permit).

- Source Specific  
 Failure to monitor/report  
 General Source Test/Monitoring Requirements  
 Recordkeeping/Reporting/Compliance Certification  
 Standard Conditions Not Included in Permit  
 Generally Applicable Requirements  
 Reporting/Monitoring for Diesel Engines  
 Record Keeping Failure  
 Facility Wide  
 Other Section \_\_\_\_\_ (title of section and section number of your permit).

(b) Emission Unit Involved.

Identify the emission unit involved in the event, using the same identification number and name as in the permit. List the corresponding permit conditions and the deviation.

Unit ID	Emission Unit 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.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence.

**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)*

**To Submit this Report:**

1. Fax to: 907-451-2187;

Or

2. Email to: [DEC.AQ.Airreports@alaska.gov](mailto:DEC.AQ.Airreports@alaska.gov) - *if faxed or emailed, the report must be certified within the Operating Report required for the same reporting period per Condition 40.*

Or

3. Mail to: ADEC  
Air Permits Program  
610 University Avenue  
Fairbanks, AK 99709-3643

Or

4. Phone Notification: 907-451-5173

*Phone notifications require a written follow-up report.*

Or

5. Submission of information contained in this report can be made electronically at the following website:

<https://myalaska.state.ak.us/deca/air/airtoolsweb/>

*if submitted online, report must be submitted by an authorized E-Signer for the Stationary Source.*

## **Section 10 Permit Documentation**

September 24, 2009 Comments from ASR to the preliminary Minor Permit AQ0198MSS01.

August 18, 2009 e-mail from Zeena Siddeek, ADEC to Brad Quade (ASR) requesting to provide soil test data or any other valid basis for the 6,390 ppmv soil contaminations assumed in the application.

August 12, 2009 Phone conversation with Brad Quad (ASR) and Zeena Siddeek. ASR request to remove the fuel consumption monitoring requirement after finding that the information served no purpose.

August 7, 2009 Phone conversation with Brad Quad (ASR) and Zeena Siddeek. ASR agreed to remove the request to treat soil contaminated with pesticides and herbicides.

August 4, 2009 e-mail from Brad Quade, Alaska Soil Recycling to Zeena Siddeek, ADEC describing the request to revise the list of soils contaminated that can be treated at the source.

May 15, 2009 Letter from Alaska Soil Recycling to ADEC. Re: Response to Incompleteness Finding from Alaska Soil Recycling.

May 8, 2009 Letter from ADEC to Alaska Soil Recycling. Re: Incompleteness findings with permit application.

March 12, 2009 Letter from Debra Dalcher, ADEC to Alaska Soil Recycling to notify that the stationary source is not required to have a Title V operating permit.

March 10, 2009 Air Quality Minor Permit Application from Alaska Soil Recycling, Division of Anchorage Sand and Gravel Co. Inc.

January, 2008 Facility Operating Report for period July-December 2007 for Alaska Soil Remediation.

January 30, 2004 Air Quality Control Permit No. 198TVP01 and Statement of Basis.

May 22, 1995 Air Quality Control Permit to Operate 9521-AA006.