

**ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION  
AIR PERMITS PROGRAM**

**TECHNICAL ANALYSIS REPORT**  
For Air Quality Control Minor Permit AQ0241MSS01

Alyeska Seafoods, Inc.  
Unalaska Seafood Processing Facility

**REPLACE EMISSION UNIT 4 WITH A CATERPILLAR 3508**

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## ABBREVIATIONS/ACRONYMS

|         |  |
|---------|--|
| AAC     | Alaska Administrative Code                               |
| ADEC    | Alaska Department of Environmental Conservation          |
| AS      | Alaska Statutes  |
| ASTM    | American Society of Testing and Materials                |
| CEMS    | Continuous Emission Monitoring System                    |
| C.F.R.  | Code of Federal Regulations                              |
| COMS    | Continuous Opacity Monitoring System                     |
| EPA     | Environmental Protection Agency                          |
| NA      | Not Applicable   |
| NAICS   | North American Industry Classification System            |
| NESHAPS | National Emission Standards for Hazardous Air Pollutants |
| NSPS    | New Source Performance Standards                         |
| PSD     | Prevention of Significant Deterioration                  |
| PTE     | Potential to Emit  |
| RM      | Reference Method   |
| SIC     | Standard Industrial Classification                       |
| SN      | Serial Number  |
| TAR     | Technical Analysis Report                                |
| TBD     | To Be Determined   |

### Units and Measures

|          |   |
|----------|---|
| bhp      | brake horsepower or boiler horsepower                       |
| gr./dscf | grains per dry standard cubic feet (1 pound = 7,000 grains) |
| dscf     | dry standard cubic foot                                     |
| gph      | gallons per hour  |
| kW       | kiloWatts   |
| kW-e     | kilowatts electric <sup>1</sup>                             |
| lbs      | pounds  |
| mmBtu    | million British Thermal Units                               |
| ppm      | parts per million   |
| ppmv     | parts per million by volume                                 |
| tph      | tons per hour   |
| tpy      | tons per year   |
| wt%      | weight percent  |

### Pollutants

|                  |  |
|------------------|--|
| CO               | Carbon Monoxide  |
| HAPS             | Hazardous Air Pollutants   |
| H <sub>2</sub> S | Hydrogen Sulfide   |
| NO <sub>x</sub>  | Oxides of Nitrogen   |
| NO <sub>2</sub>  | Nitrogen Dioxide   |
| NO               | Nitric Oxide   |
| 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



## 1.0 Introduction

This Technical Analysis Report (TAR) provides the Alaska Department of Environmental Conservation's (Department) basis for issuing Air Quality Control (AQC) Minor Permit AQ0241MSS01 to Alyeska Seafoods, Inc (Alyeska Seafoods) for the Unalaska Seafood Processing Facility (Facility). This minor permit authorizes the replacement of Emission Unit (EU) 4, currently a Caterpillar Model D-398, with EU 4a, a Caterpillar Model 3508C compression ignition engine and revises corresponding Title I provisions listed in Construction Permit 241CP03. EU 4a will be placed under an existing fuel limit, which is a surrogate for oxides of nitrogen (NO<sub>x</sub>) limit, established to avoid being classified as a Prevention of Significant Deterioration (PSD) stationary source. Alyeska Seafoods has requested that the Department incorporate the provisions of this minor permit into the Department is processing this minor permit as a significant revision to Operating Permit AQ0241TVP01.

### 1.1 Stationary Source Description

Alyeska Seafoods owns and operates the Facility. The Facility is located on Iliuliuk Bay in the city of Unalaska. The City of Unalaska is located on the island of Unalaska in the Aleutian Islands. The plant unloads raw fish and crab from fishing vessels at its loading dock. The stationary source processes raw seafood such as crab, cod and pollock, into edible products for human consumption. Waste from this process is converted to fishmeal in the fishmeal plant and prepared for shipment.

### 1.2 Permit History

This section outlines the permitting history for the Alyeska Seafoods Unalaska Seafood Processing Facility:

#### **Construction Permit 9625-AA006 (AQ0241CPT01) issued October 25, 1996 (Title I).**

The Department issued Permit 9625-AA006 on October 29, 1996. The history is as follows: In 1985, Alyeska Seafoods purchased the Pan Facility in Unalaska, Alaska. At the time of purchase, the plant consisted of four Caterpillar D398 diesel generators, a York Shipley Steam Boiler, and a Cleaver Brooks steam boiler.

On September 23, 1986, Alyeska Seafoods applied for an AQC permit to operate a new fishmeal plant. The fishmeal plant increased stationary source emissions by 3.9 tons of NO<sub>x</sub> and a permit was issued on October 27, 1986. However, this application did not fully describe the fuel burning equipment at the stationary source. The Department was unaware the stationary source could have been classified as a PSD major due to the stationary source potential to emit.

In July 1987, Alyeska Seafoods, without obtaining any permit, installed a 1,730 kW diesel generator at the plant. This installation again should have subjected the stationary source to the PSD permitting process, as the stationary source should have been classified as a PSD major stationary source since it had a potential to emit NO<sub>x</sub> over 250 tons per year. The new diesel generator had the potential to increase NO<sub>x</sub> in excess of 40 tons per year (actually up to more than 215 tons per year).

In March 1990, Alyeska Seafoods installed a Seattle Boiler Works Steam boiler, another diesel generator with a rating of 2,300 kW, a Kewanee Steam Boiler, and a Stord Hot Air Drier. The new equipment installations also should have been subject to the PSD permitting process.

On June 29, 1990, the Department advised Alyeska Seafoods that the PSD permitting process was applicable to the stationary source due to these equipment additions and the fact that the stationary source had the potential to emit over 250 tons of a regulated New Source Review (NSR) pollutant. A Compliance Order by Consent entered into on March 20, 1991, and required the stationary source to submit a PSD application. Alyeska Seafoods did prepare a PSD permit application by August 6, 1992.

The Department found the PSD application submitted in 1992 to be incomplete. A complicated situation existed in Dutch Harbor. There were numerous seafood processing plants, floating processors and other shore side installations with fuel burning equipment. There was need to gather meteorological data and coordinate it with air quality permit applications from many of these plants. It took several years to prepare a revised permit application.

During this process, Alyeska Seafoods changed the consultant it was using to prepare its AQC permit applications. While the new consultant was preparing the permit application, Alyeska Seafoods determined that the actual cumulative increase in emissions due to all of the stationary source's modifications could avoid exceeding the significant increase levels for all NSR pollutants listed in 40 CFR 52.21(b)(23). Alyeska Seafoods could maintain the increase in emissions at less than the PSD significance levels by limiting the amount of fuel burned in the various pieces of equipment at the stationary source. This being the case, the need for a PSD Permit was eliminated.

When Alyeska Seafoods finally submitted a permit application in May 1996, it was no longer a PSD submittal, but merely an AQC permit to operate application. This application took into account all of the equipment at the stationary source, provided ambient air quality modeling, and requested limitations on the amount of fuel that could be burned at the stationary source to avoid PSD requirements.

On October 29, 1996, the Department issued Permit to Operate # 9625-AA006 to Alyeska Seafoods. This permit contained limitations on the amount of fuel that could be consumed in the various items of fuel burning equipment at the stationary source in order to protect NO<sub>2</sub> ambient air quality standards and to keep the net cumulative increase in stationary source NO<sub>x</sub> emissions below the PSD triggering level. The stationary source was restricted to burning fuel with a sulfur content of no more than 0.1 percent after December 31, 1996 to protect the SO<sub>2</sub> ambient standards and increments. NO<sub>x</sub> emissions were limited to a less than a 40-ton-per-year increase from the allowable level of 259.56 TPY, which existed at the time that Alyeska Seafoods purchased the stationary source.

**Construction Permit 241CP02 issued November 25, 2002 (Title I).** On February 21, 2002, Alyeska Seafoods submitted a construction permit application requesting a revision to initial Operating Permit No. 241TVP01 for the Facility. Alyeska Seafoods requests that the 12-month fuel limit on individual units in the permit be removed and replaced with two cumulative equivalent total (CET) fuel caps; one CET is proposed for the engines and another for the boilers. They requested that the total fuel allocated to each group equal the total for each group from initial Construction/Operating Permit 241TVP01. They request that the operating hour limits contained in the initial operating permit be dropped altogether. Alyeska Seafoods requested that the Department simultaneously process this construction permit request with a revision to the operating permit.

The Department had issued Operating Permit 241TVP01, Revision 1 on August 8, 2002 to change emission fee submittal dates. Therefore, the Department incorporated the changes to permit terms and conditions in Construction Permit No. 241CP02 into the operating permit as Revision 2.

**Construction Permit No. 241CPT03, issued February 04, 2005 (Title I).** On August 30, 2004, Alyeska Seafoods submitted a construction permit application requesting revisions to Construction Permit 241CP02 and the Operating Permit 241TVP01 Revision 2. Alyeska conducted source tests in February 2004, on the diesel generators as required by the operating permit. The source tests revealed new nitrogen oxide (NO<sub>x</sub>) emission factors. Alyeska Seafoods requested that the Department revise the equation governing the CET fuel use and equation governing the total NO<sub>x</sub> emissions for the engines to reflect the new NO<sub>x</sub> emissions factors. Alyeska Seafoods also requested that the equations governing the CET fuel use and the equation governing the total NO<sub>x</sub> emissions for the boilers be combined with the fuel use limit and NO<sub>x</sub> emissions for the fishmeal drier. Additionally, Alyeska Seafoods requested that the standard permit conditions in the operating permit be replaced with the more recent version of the standard permit conditions and delete the NSPS Subpart Kb applicability requirements consistent with the revisions to 40 CFR 60 effective October 15, 2003.

### **Operating Permit No. 241TVP01**

The initial Title V operating permit application submitted on December 5, 1997, was essentially a re-submittal of the same information that was submitted to the Department in the May 1996 application. The equipment was the same and the proposed fuel consumption and fuel sulfur requirements were identical. In August 1999, Alyeska Seafoods notified the Department that it was retiring the Source Number 8, a 300 bhp Cleaver Brooks steam boiler and replacing it with a Seattle Boiler Works model HPFWB-1650, four pass wet back boiler with an S.T. Johnson Model FD98 low NO<sub>x</sub> combustion system. Alyeska Seafoods maintained that the fuel pump on this burner had been factory set so that the fuel input could not exceed 71 gallons per hour.

Alyeska Seafoods maintained that the heat content of the fuel was such that the heat input rate of this burner could not exceed 10,000,000 Btu per hour at 71 gallons per hour. The U.S. EPA was asked for an Applicability Determination, and EPA determined that the NSPS requirements of 40 C.F.R., Part 60, Subpart Dc, did not apply to the new boiler.

The Department issued the initial Title V Operating Permit 241TVP01 on May 23, 2000. Permit 241TVP01 Administrative Revision 1, was issued on August 7, 2002 and changed the fee requirements of the permit.

Permit 241TVP01 Revision 2 was issued on February 21, 2003 and incorporated changes of Construction Permit No. 241CP02 (as described below). The renewal application for Permit AQ0241TVP02 was submitted on August 30, 2004 in coordination of the application for Construction Permit 241CP03 (as described below). On December 23, 2004, the Department public noticed the renewal permit and construction permit.

**Operating Permit No. AQ0241TVP02, issued March 24, 2005 (Title V).** This permit is the first renewal of the Title V operating permit, which includes the Title I provisions of Operating/Construction Permit 241TVP01.

### 1.3 Application Description

In their June 4, 2009 application, Alyeska Seafoods requested that the Department authorize the replacement of EU 4, currently a Caterpillar Model D398, with a Caterpillar Model 3508C. The current Caterpillar D398 is diesel generator rated at 500 kiloWatts (kW) and includes a generator. EU 4 is currently operating under the Facility's fuel limits, which are a surrogate for a NO<sub>x</sub> PSD major stationary source classification, avoidance limit. The Department established this limit for EUs 1 through 6 in Construction Permit 241CPT03. Alyeska Seafoods also requested that EU 4a, the Cat 3508C generator, be included under operational limits for EUs 1 through 6 established by the Department in Construction Permit 241CPT03 to avoid being classified as a PSD stationary source. Additionally Alyeska Seafoods requested that the Department administratively amend the current operating permit to include the revisions of Minor Permit AQ0241MSS01.

### 1.4 Emissions Summary and Permit Applicability

Table 1, below shows the proposed Potential to Emit (PTE) in tpy of the Caterpillar 3508C generator (EU 4a in Table 1 of Permit AQ0241MSS01).

Alyeska Seafood's PTE calculations for the Caterpillar 3508C generator in the application included the following assumptions.

1. Operation based on 8,760 operations.
2. Worst case vendor emission factors for NO<sub>x</sub>, Carbon Monoxide, and Particulate Matter with an aerodynamic less than 10 microns. AP-42 emission factor for Volatile Organic Compounds. (CO, PM-10 and VOC, respectively).
3. Sulfur Dioxide (SO<sub>2</sub>) emissions calculated by mass balance with diesel fuel sulfur limited to 0.0015 weight percent Sulfur (wt% S)

To determine the increase in tpy of CO, PM-10, VOC and SO<sub>2</sub> for this project, the Department compared the PTE for each of these pollutants for the CAT 398 generator with the CAT 3508C generator operating up to the 8,760 times the hourly maximum fuel consumption for each of these pollutants. The Department also calculated SO<sub>2</sub> PTE for EU 4a based on the use of ULSD fuel. There is a decrease in the NO<sub>x</sub> PTE.

As shown in Table 1, this project is not classified under 18 AAC 50.502(c) (3) taking into account the ORL on the fuel sulfur content. Table1, shows only the increase due to replacing EU4 with 4a, as that is the only change affecting permit applicability in this permit

Table 2 shows the stationary source's assessable emissions due to the operation of the CAT 3508C generator.

**Table 1 – Unalaska Seafood Processing Facility Minor Permit Applicability, tpy**

| <b>Pollutant</b>                     | <b>NO<sub>x</sub></b> | <b>CO</b> | <b>PM-10</b> | <b>VOC</b> | <b>SO<sub>2</sub></b> |
|--------------------------------------|-----------------------|-----------|--------------|------------|-----------------------|
| <b>Emission Unit 4 PTE</b>           | 56.66                 | N/A       | 1.71         | N/A        | 3.42                  |
| <b>Emission Unit 4a PTE</b>          | 49.49                 | N/A       | 0.17         | N/A        | 2.66                  |
| <b>Change in PTE</b>                 | -7.2                  | -8.5      | -1.6         | 0          | -0.8                  |
| <b>Minor Permit Threshold</b>        | 10                    | N/A       | 10           | N/A        | 10                    |
| <b>Minor Permit under 50.502(c)?</b> | No                    | N/A       | No           | N/A        | No                    |

**Table 2– Unalaska Seafood Processing Facility Stationary Source Change in Assessable Emissions Summary, tpy**

| <b>Pollutant</b>                         | <b>NO<sub>x</sub></b> | <b>CO</b> | <b>PM-10</b> | <b>SO<sub>2</sub></b> | <b>VOC</b> | <b>Total</b> |
|--|-----------------------|-----------|--------------|-----------------------|------------|--------------|
| <b>Existing PTE</b>                      | 363.6                 | 160.8     | 20.4         | 67.8                  | 11.2       | 623.8        |
| <b>Change in PTE due to Unit 4 to 4a</b> | - 7.2                 | -8.5      | -1.6         | -0.8                  | 0          |              |
| <b>New PTE</b>                           | 356.4                 | 152.3     | 0.17         | 67                    | 11.2       |              |
| <b>Revised Assessable Emissions</b>      | 356.4                 | 152.3     | 0            | 67                    | 11.2       | 586.9        |

### 1.5 Department Findings

The Department made the following findings regarding Alyeska Seafood's application:

1. Revising the existing Title I permit conditions described in the application requires a minor permit under 18 AAC 50.508(6).
2. Alyeska Seafoods requested that the Caterpillar 3508C generator be included under the current operational fuel limits equations 1 and 2 for EUs 1 through 6 established by the Department in Construction Permit 241CPT03 to avoid PSD Review.
3. The Caterpillar 3508C generator is subject to state Air Quality Control regulations 18 AAC 50.055(a)(1) for visible emissions, 18 AAC 50.055(b)(1) for particulate matter, and 18 AAC 50.055(c) for sulfur compound emissions.
4. Alyeska Seafoods requested that the Department administratively amend the current operating permit, AQ0241TVP02, to include the revisions of Minor Permit AQ0241MSS01. As described under the Section 3.0, Alyeska Seafoods may not operate under the minor permit until the current operating permit is amended as requested.
5. The Facility is located in the Aleutians West Coastal District. The project is consistent with the Alaska Coastal Management Program (ACMP) through AS 46.40.040(b) (1). This application is a minor permit under 18 AAC 50.508(5) and 18 AAC 50.508(6). These classifications are not in the ACMP C list, therefore the ACMP project modification and Department single agency review procedures do not apply.

## **2.0 Permit Conditions**

### **2.1 Requirements for all Minor Permits.**

As described in 18 AAC 50.544(a), each minor permit issued under 18 AAC 50.542 must identify the stationary source, the project, the Permittee, and contact information, and the requirement to pay fees.

The permit cover page identifies the stationary source, the project, the Permittee, and contact information as required in 18 AAC 50.544(a) (1). As required under 18 AAC 50.544(a), the minor permit contains the fee requirements of 18 AAC 50.400 – 18 AAC 50.499. The Department is rescinding the fee requirements established in Operating Permit No. AQ0241TVP02 and replacing them with the new fee requirements established by this minor permit. As shown in Table 2 the assessable emissions are 366.8 tpy. This reflects all changes to the stationary source through this minor permit.

### **2.2 Requirements for a Minor Permit that Revises or Rescinds a Previous Title I Permit**

As described in 18 AAC 50.544(i) a minor permit classified under 18 AAC 50.508(6) must contain terms and conditions as necessary to ensure that the Permittee will construct and operate the stationary source in accordance with 18 AAC 50. In this permit, the Department is revising Construction Permit 241CPT03 to (1) revise the emission unit inventory, and (2) revise a PSD avoidance condition.

#### **2.2.1 Authorization and Revision to Emission Unit Inventory**

The Department re-established the emission unit inventory contained in Exhibit A in Permit 241CPT03 in Section 2 and updated it to remove Emission Unit 4 and to add Emission Unit 4a.

#### **2.2.2 Revision to Condition II of Construction Permit No. 241CPT03**

Alyeska Seafoods requested to remove emission unit 4 (a Caterpillar Model D398) and to add EU 4a (a Caterpillar Model 3508C) to the EU Inventory and to the PSD avoidance conditions in condition II of Construction Permit 241CPT03. Alyeska Seafoods requested that the Operating Permit AQ0241TVP02 is amended to include the terms and conditions of Minor Permit AQ0241MSS01, through the administrative amendment process under 18 AAC 50.326(c). The Department established Construction Permit Condition II to allow the stationary source to avoid PSD review, through a federally enforceable limit on NO<sub>x</sub> emissions. Minor Permit AQ0241MSS01 revises the equations associated with the limits to account for the new emission unit (EU 4a); however, it does not change the limit itself, thus no increase in NO<sub>x</sub> emissions.

### **2.3 Requirements for Processing this Minor Permit under 18 AAC 50.326(c)**

#### **2.3.1 State Emission Standards**

Alyeska Seafoods requested that the Department incorporate this minor permit into the Title V operating permit as an administrative amendment as described in 18 AAC 50.326(c), therefore the Department included the on-going monitoring, recordkeeping, and reporting (MR&R) that would be necessary for a Title V operating permit or under the Compliance Assurance Monitoring Rule for state emissions standards.

##### **2.3.1.1 Visible Emission Standard**

New EU 4a is fuel-burning equipment subject to the state standard for visible emissions in 18 AAC 50.055(a) (1).

Alyeska Seafoods did not provide a demonstration that EU 4a will comply with the state standard, however this unit is subject to on-going MR&R. The Department will accept the first demonstration under the on-going MR&R as the initial compliance demonstration.

#### **2.3.1.2 Particulate Matter Standard**

New EU 4a is fuel-burning equipment subject to the state standard for PM emissions of 0.05 grains per dry standard cubic foot of exhaust gas (gr./dscf) in 18 AAC 50.055(b)(1).

Alyeska Seafoods did not provide a demonstration that EU 4a will comply with the state standard, however this unit is subject to on-going MR&R. The Department will accept the first demonstration under the on-going MR&R as the initial compliance demonstration.

#### **2.3.1.3 Sulfur Dioxide Standard**

New EU 4a is fuel-burning equipment subject to state standards for SO<sub>2</sub> in 18 AAC 50.055(c).

Alyeska Seafoods did not provide a demonstration that Unit 4a will comply with the state standard, however this unit is subject to on-going MR&R. The Department will accept the first demonstration under the on-going MR&R as the initial compliance demonstration.

### **2.3.2 New Source Performance Standards (NSPS)**

Because the Department is incorporating Permit AQ0241MSS01 as an administrative amendment to the Title V permit, the Department included the current Subpart A and IIII requirements for new EU 4a.

As specified in ‘Table 8 to Subpart IIII of Part 60 – Applicability of General Provisions to Subpart IIII’ (Table 8 to Subpart IIII) contained in 40 CFR 60.4218 only certain requirements of 40 CFR 60.1 through 60.19 apply to Emission Unit 4a. The final minor permit contains a condition reflecting the requirements of Table 8 to Subpart IIII as they apply to Emission Unit 10. This condition also contains the initial start up notification for Emission Unit 4a required by 40 CFR 60.4214(a).

The minor permit contains conditions requiring EU 4a be certified by the manufacturer to meet minimum emission standards. These standards are required under 40 CFR 60.4201(d) based on EU 4a’s intended use, model year and cylinder size (non-emergency use, 2007, 11.63 liters, respectively). As required under 40 CFR 60.4201(d) EU 4a is subject to the emission standards under 40 CFR 94.8.

The minor permit also contains conditions limiting the sulfur content of fuel consumed in EU 4a. These conditions are required under 40 CFR 60.4207(a).

### **2.3.3 National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

The Facility is an area source for hazardous air pollutants; therefore, the new reciprocating internal combustion engine has been reviewed for the applicability of NESHAP Subpart ZZZZ. The emission unit is larger than 500 hp and is not subject to NESHAP Subpart ZZZZ, thus the Department did not include the NESHAP Subpart ZZZZ requirements in the minor permit. This finding does not mean that Department has granted a permit shield for this requirement.

## **2.4 Recordkeeping, Reporting, and Certification Requirements**

All air quality control permits must contain procedures for recordkeeping, reporting, and certification.

Certification and information request requirements are specifically required by 18 AAC 50.200 and 18 AAC 50.205, respectively.

## **2.5 Standard Conditions**

The minor permit contains additional requirements as necessary to ensure that the Permittee will construct and operate the stationary source or modification in accordance with 18 AAC 50, as described in 18 AAC 50.544(i).

## **3.0 Permit Administration**

The changes authorized by Minor Permit AQ0241MSS01 are neither “Off Permit Changes” to Operating Permit AQ0241TVP02, nor are they “Operation Flexibility” changes to the operating permit.

It is not an “Off Permit Change” to the operating permit because the condition to be changed is addresses in Operating Permit AQ0241TVP02. It is not an “Operational Flexibility” change because it is not a Clean Air Act 502(b) (10) change (i.e. it does “contravene enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.”)

Therefore, Alyeska must not operate in accordance with the minor permit until the Department issues a revised Title V operating permit.

Alyeska Seafoods requested the Department incorporate the revisions in Minor Permit AQ0241MSS01 into the operating permit AQ0241TVP02. The Department intends to incorporate these minor permit provisions into the Title V permit as an administrative amendment after EPA’s 45-day review.