

Standard Conditions Rulemaking, 2008
Title V and Title I Reg Project Documentation and Rationale

1. Update to 18 AAC 50.030(9)

The subsection is being revised to update the adoption by reference date of the *Performance Audits for COMS* (Continuous Opacity Monitoring Systems) document.
2. Update to 18 AAC 50.035(a)(1)

The *In Situ Burning Guidelines for Alaska* document has been revised through a joint effort of the Division of Spill Prevention and Response and the Air Quality Division. The proposed changes are being public noticed as part of this regulation package to provide opportunity for the public to comment on them. Additionally, paragraph 18 AAC 50.035(a)(1) is being revised to update the adoption by reference date of the department's revised *In Situ Burning Guidelines for Alaska* document.
3. Update to 18 AAC 50.345. Construction and operating permits: standard permit conditions.

The language of this section is being revised to include the ability to use standard conditions in minor permits. When the 18 AAC 50.345 regulations were originally adopted, the Minor Permit Program had not been developed and therefore was not included as a program that could use standard conditions in permits. This change will address inclusion of Minor Permits in the list of permits which can include standard conditions.
4. Update to Standard Condition III – Excess Emissions and Permit Deviations

This condition is being updated to revise a Departmental e-mail address used in electronic submission of the form. The change is needed due to recent upgrades in Departmental IT support and does not affect any of the requirements or standards of the condition.
5. Update to Standard Condition IV – Notification Form

This standard permit condition is being updated to move the checkbox of “Failure to monitor/report” from the Excess Emissions section to the Permit Deviations section, because it is a better fit under the Permit Deviations section. 18 AAC 50.990(34) defines “excess emissions” as “emissions of an air pollutant in excess of any applicable emissions standard or limitation. “Failure to monitor/report” is not necessarily related with emissions of an air pollutant.
6. Update to Standard Condition VII – Operating Reports

This condition is being updated to address the confusion which occurs concerning permit reporting requirements that span either side of a permit renewal date. The revised condition will ensure complete reporting obligations for the entire range of reportable dates that continue over permit renewal transition periods. The change was required due to the fact that the required submittal

periods for permit renewals may result in time gaps between permit expiration and renewal permit issuance. Clarification was needed to ensure that Permittees are providing complete reporting coverage for the entire duration of the reporting period when one permit may lapse and does not terminate on the end date of reporting for that permit, and another permit may become effective for only a short period within the reporting period. Also a change was made to allow for submission of one electronic copy (PDF or other format) of the report.

7. Update to Standard Condition IX – Visible Emissions and Particulate Matter Monitoring Plan for Liquid-Fired Emission Units

This condition is being updated to correct a typographical error and to update a previously existing regulation in the State Implementation Plan (SIP) that has become superseded by EPA’s approval of the Department’s revised SIP regulation. It was also updated to require the recording of sun location when using Method 9 during field opacity observations.

8. Update to Standard Condition XIII – Coal Fired Boilers

This standard condition is being updated in two ways:

a) to remove the phrase “before 80 percent of the allowable operating hours before the next test have elapsed” because the requirement is in conflict with the requirements under section 2.1(b)(iii). The schedule for source testing is specified in 18 AAC 50.345(m) and has been further clarified in Condition 2.1(b)(iii) of this standard condition. The requirement “before 80 percent of the allowable operating hours before the next test have elapsed” could require the Permittee to conduct a source test nearly a year before the test is due; and

b) to add a note to Section 3.1(a)(iii) of this standard condition to clarify that the equation requires the calculations to be based on a three hour average of emissions.

9. Update to *Performance Audits for COMS*, adopted by reference in 18 AAC 50.030(9)

The document was updated to add the failure criteria for the zero alignment check.

The condition lacked a failure requirement. Air Quality permits require the Permittee to perform the zero alignment check but did not specify what the passing grade was or what to do if the unit did not pass the check.

10. New Standard Permit Condition XIV – Document Submittals and Electronic Copies

This new standard condition directs Permittees to send copies of required reports directly to EPA, and allows Permittees to send EPA various forms and reports in electronic form (common use programs such as Microsoft Word® *.doc

or Adobe Acrobat® *.pdf) rather than in hard copy form, which would then have to be changed to electronic form for storage and distribution. Formerly, the Department would distribute the copies to EPA. This change eases the distribution and storage burden on the Department and EPA.

11. Update to 18 AAC 50.544. Minor permits: content.

The language of this section is being revised to include the ability to use standard conditions in minor permits. When the 18 AAC 50.345 regulations were originally written, the Minor Permit Program had not been developed and therefore was not included as a program that could use standard conditions in permits. This change will address inclusion of Minor Permits in the list of permits which can include standard conditions.