

**Changes to Draft SPCs I - XVII Revisions Public Noticed January 17, 2018**

The current language in the Title V Standard Permit Conditions (SPCs) I – XVI needs to be updated to align with the recent changes in regulations and electronic data submittal procedures, to correct material mistakes, to make the conditions language clearer and consistent, and such other changes as to address comments commonly received during public noticing of draft TV permits. SPC XVII (Reporting Requirements) is a new standard permit condition developed to address standard requirements for documents submittal.

The first drafts were public noticed on January 17, 2018. There were numerous comments received (mainly from BPXA/CPAI) on the proposed draft SPCs. Because of the length of time that has lapsed since they were first out to public notice, the Department is re-public noticing the updated SPCs, with new edits addressing the comments received and other edits discovered during the process. The updated proposed draft SPC’s have undergone review and approval of the APP team, as well as, the Air Non-Point group (with regard the SPC’s XV an XVI - Emissions Inventory Reporting and Form). The table below shows how the January 17, 2018 PN draft SPCs have been revised.

Text formatting, typographical, and minor grammatical error corrections, such as use of **Permittee**, **Department**, emissions units, **EU ID**, **Standard Permit** Condition, Condition, TPY, online (instead of permittee, department, sources, EU, Standard **Operating** Permit Condition, condition, tpy, on-line, respectively), punctuation marks, etc., for consistency and proper punctuation and grammar usage throughout the documents are not specified in the table, unless no other changes were made on SPCs.

**Table 1. Changes to Draft Revisions to SPCs I - XVII Public Noticed on January 17, 2018**

Standard Permit Condition	Revision Type	Changes on 1/17/2018 Public Notice Version	Reason for Change
I Emission Fees Revised 5/18/2016	Minor	“The following applies to this standard permit condition:” section - Added item 5 and examples of NESHAP and NSPS subparts in item 4. Condition 1.2d - Corrected citations.	Per BPXA/CPAI’s comments and ADEC review - to be more specific on citation levels and for clarity on applicability.
		Condition 2 - Changed the lead-in sentence from “Emission fees will be assessed as follows...” to “The Permittee shall comply...” Conditions 2.2 and 2.2a –Changed “...the report may be submitted by... email under a cover letter using...” to “...the Permittee may submit the report under a cover letter, by either... an email addressed to”	ADEC edits - for clarity and to keep the conditions in active voice.
		Condition 2.1a (now 2.4) - Moved the condition below Condition 2.3 and changed “may” to “shall.”	ADEC edits – for clarity and better organization of condition requirements
	Minor	Condition 1 – Added citation 18 AAC 50.040(j)(4),	ADEC edits – for accuracy on citations used

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<p><b>II</b> Air Pollution Prohibited Revised 9/27/2010</p>		<p>Reorganized conditions to group respective requirements under each sub-condition for Monitoring (1.1), Recordkeeping (1.2), and Reporting (1.3). Added a lead-in statement in each sub-condition (i.e., “The Permittee shall monitor as follows:”; “... shall keep records...”; and “... shall report...”</p> <p>Condition 1.1a (now 1.3c) – Moved under the reporting requirements of Condition 1.3.</p>	<p>Per BPXA/CPAI’s suggested edits - for better organization of MR&amp;R requirements.</p>
<p><b>III</b> Excess Emissions and Permit Deviation (EE/PD) Reports Revised 9/27/2010</p>	<p>Significant</p>	<p>Renumbered conditions to start in 1 and not 3.</p> <p>Reorganized conditions by listing distinct reporting requirements and timelines for "excess emissions" (Condition 1.1), "permit deviations" (Condition 1.), “all other excess emissions and permit deviations not covered by Conditions 1.1 and 1.2” (Condition 1.3) and EE/PD Notification Form requirements (Condition 1.4).</p> <p>In Condition 1.1, added the subtitle “Excess Emissions Reporting.” Specifies “emissions standards or limits” to indicate occurrence of excess emissions. Condition 1.1 includes excess emissions that present a potential threat to human health or safety, are unavoidable, and that are continuous or recurring.</p> <p>In Condition 1.2, added the subtitle “Permit Deviations Reporting.” Includes reporting “according to the required deadline for failure to monitor, as specified in other applicable conditions of this permit” to cover permit deviations that are not “excess emissions.”</p> <p>Condition 1.3 covers all other excess emissions and permit deviations reporting not covered by Conditions 1.1 and 1.2 and provides reporting due date as “within 30 days after the end of the month during which the excess emissions or deviation occurred <b>or as part of the next routine operating report, whichever is sooner</b>” (<i>added the bold text</i>) consistent with 18 AAC 50.240(c).</p> <p>In Condition 1.4 (was 3.2), added the subtitle “Notification Form.”</p>	<p>Per BPXA/CPAI’s suggested edits (partially) - for better organization and clarity.</p> <p>Note: ADEC <b>did not</b> accept the following BPXA/CPAI’s requests:</p> <ol style="list-style-type: none"> <li>1. Add “or are discovered” after “within 30 days after the end of the month during which the excess emissions or deviation occurred” in Condition 1.3.</li> <li>2. Add “no later than when the next annual compliance certification” for reporting due date for permit deviation reports in Condition 1.2.</li> </ol> <p>No such terms are specified in 18 AAC 50.240(c), from which Conditions 1.2 and 1.3 are based. The Department deems that 30 days is sufficient time for the Permittee to discover and report an EE/PD event. Submittal of EE/PD report can also be included with the next operating report, as allowed in SPC III Condition 1.3 and SPC VII (Operating Reports) Condition 1.2.</p>
<p><b>IV</b> EE/PD Notification</p>	<p>Minor</p>	<p>Typographical and text formatting corrections throughout the document.</p>	<p>Per BPXA/CPAI suggestions (partially) and additional ADEC review edits - for clarity and consistency with electronic version..</p>

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Form Revised 9/27/2010		<p>SPC IV title – Added “for Excess Emissions and Permit Deviation”</p> <p>“Reason for notification,” and Sections 1(b) &amp; (c) and 2(c) &amp; (d) – Added clarifying notes.</p> <p>Sections 1(c) and 2(c) &amp; (d) – added data entry box.</p> <p>Section 1(e) – Changed “...only one” to “all that apply and...” and added check box and option for “Failure to Monitor/Record /Report”</p> <p>Added Section 1(f) Corrective Actions, consistent with the electronic version</p> <p>Reorganized and edited instruction steps in the “To submit .this report” box at the end of the form.</p>	
V Insignificant Emissions Units Revised 9/27/2010	Minor	<p>Reworded item 1 and added item 2 (regarding incinerator) under the applicability section.</p> <p>Added “for insignificant emissions units to demonstrate compliance with the emissions standards under Conditions 1.1, 1.2, and 1.3” at the end of Condition 1.4d.</p> <p>Added “, adopted by reference under 18 AAC 50.346(b)(4),” in the last paragraph/sentence in the Statement of Basis.</p>	Per BPXA/CPAI’s comments - for clarity and consistency.
		<p>Corrected citation references.</p> <p>Added a lead-in statement in Condition 1.4 (“The Permittee shall comply with the following:”).</p>	<p>ADEC’s edits - for accurate citations.</p> <p>ADEC’s edits - to avoid redundancy.</p>
VI Good Air Pollution Control Practices Revised 8/25/2004	Minor	<p>Added “Include Condition 1.4 only as applicable” at the end of the 2<sup>nd</sup> paragraph (regarding applicability).</p> <p>Adjusted condition levels.</p> <p>Removed the citation “50.040(j)”.</p>	ADEC edits - for clarity, better text organization, and accuracy in citations.
VII Operating Reports Revised 5/18/2016	Minor	<p>Corrected citations under Condition 1.5.</p> <p>Deleted reference to 40 CFR 71.6(c)(1) in the Statement of Basis. This citation is specific to certification requirement. Although certification is also required in</p>	Per BPXA/CPAI’s comments and ADEC’s edits - for accurate citations.

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		operating reports, that part is not the focus of this condition.	
VIII Visible Emissions and Particulate Matter Monitoring Plan for Gas Fuel-Burning Equipment Revised 8/25/2004	Minor	Added the 2 <sup>nd</sup> paragraph to explain “gas fuel” covered by this SPC.  Corrected citations.	ADEC edits - for clarity, and accuracy in citations.
IX Visible Emissions and Particulate Matter Monitoring Plan for Liquid Fuel-Burning Equipment Revised 9/27/2010	Significant	Title – Added back “and Flares”; flares are not liquid fuel-burning equipment.  Several revisions to the PN draft SPC IX as a result of BPXA/CPAI’s comments and ADEC’s additional edits.  Detailed list of changes made to the 9/27/2010 version of SPC IX are included on the last page of the draft revisions to SPC IX.	<b>Repeal and replace</b> September 27, 2020 version for a cleaner presentation – too many changes (per BPXA/CPAI’s comments and ADEC edits).
X Reasonable Precautions to Prevent Fugitive Dust Revised 9/27/2010	Minor	Typographical – changed “emission unit” to “emissions units”; Standard Operating Permit Condition” to “Standard Permit Condition”	Per BPXA/CPAI’s comments and ADEC edits – for consistency on terminologies.
XI SO <sub>2</sub> Emissions From Liquid Fuel-Burning Emissions Units Revised 8/25/2004	Minor	SPC Title - changed “Fuel-Burning Emissions Units” to “Fuel-Burning Equipment”  Corrected citations.  Used “wt% <sub>fuel</sub> ” as an acronym for fuel sulfur content in percent by weight.	ADEC edits – for consistency with terminology in 18 AAC 50.990, to be more specific and accurate on citations, to be consistent with acronym used in the Title V template.
		Condition 2.3 – corrected referenced citation 18 AAC 50.040(a)(1) to 18 AAC 50.040(a)(3)  Condition 3.1 – changed cross-referenced condition from SPC XII to Condition 2.3.	Per BPXA/CPAI’s comments – to correct error on citation, simplify and be more accurate and referenced condition, and for clarity on reporting requirements.

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		Condition 3.2 – added “for each month covered by the report:” at the end.	
<b>XII</b> SO <sub>2</sub> Material Balance Calculation Revised 8/25/2004	Minor	Added the citation 18 AAC 50.346(c)	ADEC edits – to provide citation/regulatory basis
		First paragraph below the equations table – deleted “equal to” and added “, respectively.”  Third paragraph below the equations table – changed “engine” to “emissions unit.”	Per BPXA/CPAI’s comments and ADEC edits – for clarity.  Per BPXA/CPAI’s comments – for clarity, to include liquid fuel-burning equipment other than engines.
<b>XIII</b> Coal-Fired Boilers Revised 8/20/2008	Significant	Updated the conditions to include applicable requirements for the different categories of coal-fired boilers subject to visible emissions standards under 18 AAC 50.055(a)(1) and (a)(9) and particulate matter standards under 18 AAC 50.055(b)(2).  Detailed list of changes made to the 8/20/2008 version of SPC XIII are included on the last page of the draft revisions to SPC XIII.	<b>Repeal and replace</b> August 20, 2008 version for a cleaner presentation – too many changes (from ADEC’s review).  Note: No comments were received on draft SPC XIII.
<b>XIV</b> Document Submittals and Electronic Copies Revised 8/20/2008	Minor	Changed title to Permit Application and Submittals.  Corrected EPA address in Condition 1.2.  Corrected citations under Condition 1.4.	Per BPXA/CPAI’s comments and ADEC edits – for accuracy and clarity.
<b>XV</b> Emission Inventory Reporting Revised 5/18/2016	Significant	Added “for the previous calendar year” in Condition 1.  Used the terms “every year inventory” and “triennial inventory” to describe “annual’ and “every third year” inventory.  Specified emissions thresholds for “Attainment and Unclassifiable Areas” and “Nonattainment Areas.”  Used a footnote in Condition 1.3 to explain EOA’s triennial reporting schedule.  Revised Condition 2 (was 1.4 in the PN version) to add more details on electronic and non-electronic data submittal procedures.  In the Statement of Basis, removed the paragraph pertaining to continuous emissions monitoring systems (CEMS) as a preferred method of calculating emissions;	Per BPXA/CPAI’s comments and ADEC edits – for clarity and consistency with 40 C.F.R. 51

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		and added a paragraph regarding triennial reporting requirements for Type B source and sources located in nonattainment areas.	
<b>XVI</b> Emission Inventory Reporting Form Revised 5/18/2016	Significant	Updated instructions and the form.	<b>Repeal and replace</b> September 27, 2010 version for a cleaner presentation – too many changes (from ADEC’s APP and Air Non-Point review) – to make the Emission Inventory form more consistent with the data elements called for in Tables 2a and 2b to Appendix A to 40 C.F.R. 51 Subpart A. This updated version also matches the form included in the Emission Inventory Instructions available in the Department’s Air Online Services (AOS) system at <a href="http://dec.alaska.gov/applications/air/airtoolsweb/PointSourceEmissionInventory">http://dec.alaska.gov/applications/air/airtoolsweb/PointSourceEmissionInventory</a> .
<b>XVII</b> Reporting Requirements	New SPC	Changed “AS 09.25.510” to “AS 09.80.190” in Condition 1.1a and revised language to reflect current statutory language.	ADEC edits – for accuracy and clarity. AS 9.25.510 was replaced and AS 09.80.190 language should be referenced for current electronic signature requirements (Use of Electronic Records and Electronic Signatures; Variation By Agreement) in 2004.
		Corrected citations under Conditions 1 and 2. Reorganized and revised Condition 2. Revised the statement of basis.	Per BPXA/CPAI’s comments and ADEC edits – for clarity on documents submittal electronically and by hard copy and a more detailed statement of basis.
<b>18 AAC 50</b> 9/15/2018		Suggested revisions (see <a href="#">\\jn-svrfile\groups\AQ\General\Standard Conditions for Revision 2019\Edits_2019 Rd1\For Review\18-aac-50 09152018 edits.pdf</a> ): <ul style="list-style-type: none"> <li>• Page 56 [50.205(b)(1)] – “change AS 09.25.510” to “AS 09.80.190” revise language to reflect current statutory language</li> <li>• Pages 104-106 [50.346(a) &amp; (b) and Table 7] - change adoption dates; “Standard Operating Permit Condition” to “Standard Permit Condition”, titles for SPCs IV, V, XIV, VIII, IX, XI and edits under Table 7 Emission Unit or Activity column for SPCs VIII through XIII.</li> <li>• Pages 90 [(50.326(d)(2))] - add 50.076 and 50.077(?)</li> <li>• Page 100 [(50.326(j)(3))] – change “standard operating permit condition” to “standard permit condition”. Add "50.346(b)(1). [40 C.F.R. 71.6(a)(7) is permit content requirement regarding emission fees referencing 40 C.F.R. 71.9. However, 18 AAC 50.326(j)(1) excludes 40 C.F.R. 71.9. 18 AAC 50.326(j)(3) provides replacement of 40 C.F.R.</li> </ul>	APP’s and BPXA/CPAI’s suggested revisions - as a result of these SPCs revisions.

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		71.6(a)(7) by referencing 18 AAC 50.345. 18 AAC 50.345 does not have provisions for emission fees, but 18 AAC 50.346(b)(1) does.]	
		BPXA/CPAI's suggested revisions: <ul style="list-style-type: none"> <li>• Page 99 [(50.326 (h)) – Delete the first sentence “This subsection lists emissions units or activities that may be insignificant on the basis of size or production rate.”</li> <li>• Page 155 [(50.990(42)(A)) – update “as revised of” date (<b>July 1, 2007</b>) for 40 CFR 51.100(ii).</li> </ul>	The first sentence is more appropriate for 50.326 (g) (size or production rate basis). (50.326 (h) is for case-by-case category.  All revision dates referencing 40 CFR 51.100 shows <b>July 1, 2017</b> .