



P.O Box 196660

ANCHORAGE, ALASKA 99519-6660

TELEPHONE (907) 787-8700

Letter No. 48371

Email delivered to dec.air.comment@alaska.gov

November 5, 2021

Alaska Department of Environmental Conservation
Division of Air Quality
PO Box 111800
Juneau, Alaska 99811-1800

Subject: Questions and Comments Regarding Proposed Updates to 18 AAC 50.270 - Electronic Submissions

To Whom It May Concern:

Alyeska Pipeline Service Company submits the following questions and comments on the proposal by the Alaska Department of Environmental Conservation (ADEC) to amend the Air Quality Control Regulations to include electronic submission requirements noted as 18 AAC 50.270, which will mandate the use of the Permittee Portal for submitting those reports required in air quality permits.

1. Annual Compliance Certifications – ADEC indicates that there will be a specific form that will be required to be filled out and submitted in the Permittee Portal. However, ACC reports are also required to be submitted to the Environmental Protection Agency (EPA) following the Title V Operating Permit Program requirements. Since it appears that printing the completed ACC report is possible in the Permittee Portal, why couldn't the Permittee simply upload the already existing ACC reports like what is permitted for the Facility Operating Reports and NSPS Semi-Annual Reports?
2. Annual Compliance Certifications – Will the Permittee have to input all their information requiring certification into the form provided in the Permittee Portal or will ADEC have the form pre-populated?
3. Excess Emissions Reporting – ADEC indicates that this report will be required to be submitted online through the Permittee Portal. As ADEC is aware, this is a very time-sensitive submittal (2 business days from date of discovery or occurrence) and personnel who can prepare and submit these reports through the Permittee Portal may not be available at the time the excess emission occurs which can result in reporting delays and an additional permit deviation having to be submitted. To possibly alleviate this, Permittee's would be required to add and train additional personnel in the Permittee Portal while also relying on the Permittee Portal being operational when the report is due. We strongly recommend having an alternative method of submittal such as through the AQ reporting email to give Permittee's the opportunity to submit excess emission reports on time and complete.

If you have any questions regarding this submittal, please contact me at (907) 787-8897 or hilary.garney@alyeska-pipeline.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Hilary Garney".

Hilary Garney
Air Quality SME
Alyeska Pipeline Service Company