

Comments on Public Notice Draft (10/20/2021)
PROPOSED CHANGES ON AIR QUALITY CONTROL IN THE REGULATIONS OF THE ALASKA DEPARTMENT
OF ENVIRONMENTAL CONSERVATION (18 AAC 50)

The following comments are submitted by Petro Star Inc. (PSI) in response to draft proposed revisions to the 18 ACC 50 Air Quality Regulations issued for public comment on October 20, 2021, by the Alaska Department of Environmental Conservation (ADEC or Department).

PSI comments to the Department's Public Notice (PN) draft revisions are shown below as if the Department's proposed revisions have been implemented. In other words, we have not included text in our comments that the Department proposes to delete or replace unless doing so helps to better explain our proposed changes.

PSI comments for text insertions are shown in red color with underline formatting and deleted text using red color with strikethrough formatting. Occasionally, bold font and/or yellow highlighting are used to help spotlight items that are being specifically referenced for a change.

Comment 1) Petro Star requests the Department consider adding a caveat to 18 AAC 50.270, Electronic Submission Requirements, that the Permittee(s) will not be held responsible for delays in electronic reporting due to conditions outside their control.

Please add 18 AAC 50.270(i) to read:

(i) In cases that the Permittee cannot submit the data via Electronic Submission caused by conditions outside their control, all reports required by the permit may be submitted by an alternative reporting method without prior approval from the Department.

Explanation: In the past few years, several local and global incidents have redefined our expectations of the reliability of electronic reporting (e.g., the 7.0 earthquake on November 30, 2018, and the COVID-19 Pandemic.). If the Department would like to move to an all-electronic reporting system, we believe certain reprieves to unforeseen circumstances should be included in the regulatory conditions.

Comment 2) Please amend the following Condition [18 AAC 50.275(b)] as indicated below for better clarity.

(b) For the purposes of reporting actual and assessable emissions under any requirement of 18 AAC 50, stationary sources shall use consistent pollutant-specific emissions factors and calculation methods, as established in the recent permit application PTEs, approved source testing report emission factors, or other emission factors previously accepted by the Department, for all reporting requirements.

Explanation: Adding the additional language above helps to align with the Department's already established Standard Permit Condition I – Emission Fees and provides consistency throughout the regulations.