

**ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT**

Permit No.: AQ0406MSS03
Rescinds Permit No. AQ0406MSS02

Date: Final – December 13, 2006

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control (AQC) Minor Permit No. AQ0406MSS03 to the Permittee listed below.

Permittee: **Teck-Pogo, Inc.**
3520 International Street
Fairbanks, AK 99701
(907) 455-8325

Owner and Operator: Same as Permittee

Stationary Source **Pogo Mine Project**

Project **Emission Unit Changes**

Location: Latitude: 64°27'13.20" N; Longitude: 144°54'14.6" W

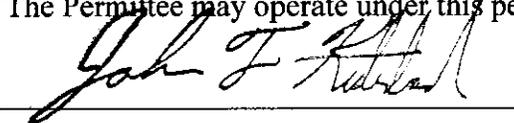
Physical Address: Goodpaster River, Alaska

Permit Contact: Karl Hanneman
e-mail: Karl.Hanneman@teckcominco.com

This permit is classified under 18 AAC 508(6). This is a permit establishing an owner requested limit (ORL) and revising or rescinding conditions from a Title I permit issued under 18 AAC 50. This permit includes provisions of AQ0406MSS02.

This permit authorizes the Permittee to operate under the terms and conditions of this permit, and as described in the original permit application and subsequent application supplements listed in Section 6 except as specified in this permit.

The Permittee may operate under this permit upon issuance.



John F. Kuterbach, Manager

Air Permits Program

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Table of Contents

Section 1.	Permit Administration.....	3
Section 2.	Applicable Requirements.....	4
	Emission Unit Inventory	4
	State Emission Standards for Industrial Processes and Fuel Burning Equipment.....	5
	State Emission Standards for Incinerators	7
	Federal New Source Performance Standards (NSPS) Requirements	7
Section 3.	General Source Testing and Monitoring Requirements.....	18
Section 4.	General Recordkeeping, Reporting, and Compliance Certification Requirements	20
Section 5.	Standard Conditions.....	23
Section 6.	Permit Documentation	28

Section 1. Permit Administration

Permit Revocation: Minor Permit No. AQ0406MSS02 is rescinded and replaced with Minor Permit No. AQ0406MSS03.

Section 2. Applicable Requirements

Emission Unit Inventory

1. General Requirements. The Permittee shall:

- 1.1 For existing Emission Units 201, 202, 401, and 402, label the emission units with the emission unit ID in a conspicuous location, on or adjacent to the stationary source, within 90 days after the permit issue date.
- 1.2 For Emission Units 102 through 104, 106 through 108, 110 through 119, 203 through 212, 213 through 219, 403 through 415, 528, 532 through 534J, 540 through 545, ALAB through ALAB4, ELAB, and CP, label each emission unit listed in Table A-1 in Exhibit A with the emission unit ID in a conspicuous location, on or adjacent to the unit, within 90 days of initial startup. Labeling is not required for individual heaters and boilers that have a maximum heat input capacity of 1.0 million British thermal units per hour (mmBtu/hr) or less, each.
- 1.3 For each emission unit described in condition 1.2, submit to the Department the installation date,¹ serial number, specification sheet,² and if applicable the electronic fuel control settings of the engine within 30 days after initial installation. Submission of this information is not required for individual heaters and boilers that have a maximum heat input capacity of 1.0 mmBtu/hr or less, each.
- 1.4 Record the installation date, relocation date, and decommissioning date for each nonroad engine (Emission Units 213 through 216, 412 and 413, and CP) and notify the Department within 30 days of each respective date.

2. **Emission Unit Inventory During Construction.** The Permittee is authorized under this permit to operate any of the units listed in Table A-1 of Exhibit A of this permit, during construction.³ For purposes of this permit, the construction phase ends when the total gold ore poured at the stationary source reaches 5,000 ounces, or two years after commissioning of any emission unit authorized to be constructed under this permit, whichever comes first. For purposes of this condition, construction commences when the first of any emission units listed in condition 1.2 is placed on site. The Permittee shall notify the Department within ten calendar days after the start date.

¹ The installation date is the same as the initial start-up date, i.e. the first day that the unit is operated.

² The specification sheet is a one to ten page summary of the unit, including applicable emissions specifications for the unit, if available.

³ This list does not include insignificant sources. Insignificant sources do not need to be authorized by a construction permit.

3. **Emission Unit Inventory During Operation.** After the construction phase has ended, the Permittee is authorized under this permit to operate only Emission Units 102 through 104, 106 through 108, 110, 111, 113, 116, 118, 119, 208 through 210, 218302, 410 through 415, 516 through 525, 528, 532 through 545, ALAB through ALAB4, ELAB, CP, AST-01 through AST-49, and LPG-01 through LPG-012 listed in Table A-1 of Exhibit A of this permit. For purposes of this permit, the operation phase starts the day after the construction phase (described in condition 2) ends.

State Emission Standards for Industrial Processes and Fuel Burning Equipment

4. **Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Emission Units 102 through 104, 106 through 108, 110 through 119, 201 through 212, 217 through 219, 301, 302, 304, 401 through 408, 409 through 411, 414, 415, 528, 532, 532A, 533, 534, 534F through 534J, 540 through 545, ALAB through ALAB4, ELAB, and CP listed in Table A-1 to reduce visibility through the exhaust effluent by any of the following:
- a. more than 20 percent for a total of more than three minutes in any one hour⁴;
 - b. more than 20 percent averaged over any six consecutive minutes⁵.
- 4.1 For Emission Units 103, 104, 106 through 108, 110 through 114, 116 through 119, 201 through 212, 217 through 219, 401 through 408, and 409 through 411 verify compliance using either condition 4.1a or 4.1b. This requirement is not applicable to individual heaters and boilers that have a maximum heat input capacity rating of 1.0 mmBtu/hr or less, each.
- a. Prior to emission unit installation, obtain a certified manufacturer guarantee that each emission unit will comply with the visible emission standard and attach a copy of the guarantee to the next operating report required under condition 47. (For Emission Units 103 and 110 the certification must cover used oil as well as distillate fuel).
 - b. Conduct a visible emission source test, using each potential fuel, on each emission unit, in accordance with condition 35.1 within 180 days of emission unit initial start-up and attach a copy of the surveillance records to the next operating report required under condition 47.

⁴ For purposes of this permit, the “more than three minutes in any one hour” criterion in this condition and condition 7.a will no longer be effective when the Air Quality Control (18 AAC 50) regulation package effective 5/3/02 is adopted by the U.S. EPA.

⁵ The six-minute average standard is enforceable only by the state until 18 AAC 50.055(a)(1), dated May 3, 2002, is approved by EPA into the SIP at which time this standard becomes federally enforceable.

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- 4.2 For Emission Units 301, 302, and 304 (explosives), and CP (portable crusher), conduct a visible emission source test in accordance with condition 35.1 within 180 days of emission unit initial start-up and attach a copy of the surveillance records to the next operating report required under condition 47. For Emission Units 301, 302, and 304 (explosives), conduct the test at the mine adit.
- 4.3 For Emission Units 102, 115, 414, 415, and 542 through 545 (liquefied petroleum gas (LPG) –fired units), burn only LPG (includes propane) as fuel. Monitor by certifying in each operating report under condition 47 whether each of these emission units burned only LPG. Report under condition 45 if any fuel is burned other than LPG.
5. **Particulate Matter (PM).** The Permittee shall not cause or allow PM emitted from Emission Units 102 through 104, 106 through 108, 110 through 119, 201 through 212, 217 through 219, 301, 302, 304, 401 through 408, 414, 415, 528, 532, 532A, 533, 534, 534A through 534J, 540 through 545, ALAB through ALAB4, ELAB, and CP listed in Table A-1 to exceed 0.05 grains per dry standard cubic foot (gr./dscf) of exhaust gas corrected to standard conditions and averaged over three hours.
6. **Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from Emission Units 102 through 104, 106 through 108, 110 through 119, 201 through 212, 217 through 219, 301, 302, 304, 401 through 408, 414, and 415, and 542 through 545, listed in Table A-1 to exceed 500 parts per million (ppm) averaged over three hours.
- 6.1 For Emission Units 102 through 104, 106 through 108, 110 through 114, 116 through 119, 201 through 212, 217 through 219, and 401 through 408, use only fuel with a sulfur content less than 0.5 percent by weight.
- a. For distillate fuel, use only fuel grades that require a sulfur content less than 0.5 percent by weight. Keep receipts that specify fuel grade and amount. Include in the operating report required under condition 47 a list of the fuel grades received at the stationary source during the reporting period.
 - b. For used oil:
 - (i) Except as provided in condition 6.1b(vi), obtain a representative sample from each storage tank that stores used oil once per calendar month, sometime during the first fifteen days of the calendar month.
 - (ii) Analyze the sample obtained in condition 6.1b(i) or 6.1b(vi) for sulfur content using a sulfur test method listed in the American Society of Testing and Materials (ASTM) Standard Specification for Fuel Oils (ASTM D-396) or in the ASTM Standard Specification for Diesel Fuel Oils (ASTM D-975).
 - (iii) If the analysis conducted under condition 6.1b(ii) results in a sulfur content of 0.5 percent or greater, then add more distillate oil to the blended fuel and retest until the blended fuel's sulfur content is less than 0.5 percent by weight.
 - (iv) Maintain records showing the results of each analysis.
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- (v) Include a copy of the test results required under condition 6.1b(iv) with the report required under condition 47.
- (vi) If the highest resulting sulfur content from 12 consecutive monthly samples conducted under condition 6.1b(i) is less than 0.25 percent by weight, the Permittee may reduce the sampling frequency to once per calendar year; under this condition, the Permittee shall obtain the sample within the first 30 days of each calendar year.

6.2 For Emission Units 102, 115, 414, 415, and 542 through 545, use only LPG as fuel. Monitor by certifying in each operating report required in condition 47 whether or not each of these emission units fired only LPG during the reporting period.

State Emission Standards for Incinerators

7. **Incinerator Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, through the exhaust of Emission Units 409 through 411 (incinerators), to reduce visibility by any of the following:
- a. More than 20 percent for a total of more than three minutes in any one hour⁶;
 - b. More than 20 percent averaged over any six consecutive minutes.⁷

Verify compliance using either condition 4.1a or 4.1b.

Federal New Source Performance Standards (NSPS) Requirements

Subpart A – General Provisions

8. **NSPS Subpart A – Notification and Recordkeeping.** Any owner or operator (i.e. the Permittee) subject to the provisions of Subpart A shall furnish to the Administrator⁸ (and the Department) written notifications or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification as follows:
- 8.1 A notification of the date that construction (or reconstruction as defined in 40 C.F.R. 60.15) of an affected facility⁹ is commenced postmarked no later than 30 days after such date.
 - 8.2 A notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date.

⁶ See Footnote 4.

⁷ The six-minute average standard is enforceable only by the state until 18 AAC 50.050(a), dated May 3, 2002, is approved by EPA into the SIP at which time this standard becomes federally enforceable.

⁸ *Administrator* means the administrator of EPA or his authorized representative, as defined in 40 C.F.R. 60.2, effective 7/1/01.

⁹ *Affected Facility* means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 C.F.R. 60.2, effective 7/1/01.

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- 8.3 A notification of any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies unless that change is specifically exempted under an applicable subpart or in 40 C.F.R. 60.14(e), this notice shall be postmarked 60 days or as soon as practicable before the change is commenced and as indicated in 40 C.F.R. 60.7(a)(4).
- 8.4 A notification of the anticipated date for conducting the opacity observations required by 40 C.F.R. 60.11(e)(1). The notification shall also include, if appropriate, a request for the Administrator (and the Department) to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date.
- 8.5 A notification whether continuous opacity monitoring system data results will be used to determine compliance with the applicable opacity standard during a performance test required by 40 C.F.R. 60.8 in lieu of Method 9 observation data as allowed by 40 C.F.R. 60.11(e)(5). This notification shall be postmarked not less than 30 days prior to the date of the performance test.
- 9. NSPS Subpart A – Startup, Shutdown, & Malfunction Requirements.** Any owner or operator (i.e. the Permittee) subject to Subpart A shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility (Emission Units 414 and 415, and 533 through 534E); any malfunctions of the air-pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.
- 10. NSPS Subpart A – Performance Tests.**
- 10.1 Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility and at such other times as may be required by the Administrator (or Department) under section 114 of the Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Administrator (and the Department) a written report of the results of such performance test(s).
- 10.2 Performance tests shall be conducted as indicated in 40 C.F.R. 60.8(b) & (c).
- 10.3 The owner or operator of an affected facility shall provide the Administrator (and Department) at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Administrator (and the Department) the opportunity to have an observer present.
- 10.4 The owner or operator shall provide, or cause to be provided, performance testing equipment as indicated in 40 C.F.R. 60.8(e).
- 10.5 Each performance test shall be conducted in accordance with 40 C.F.R. 60.8(f).

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11. **NSPS Subpart A – Good Air Pollution Control Practice.** At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility (Emission Units 414 and 415, and 533 through 534E) including associated air pollution control equipment in a manner consistent with good air pollution practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
 12. **NSPS Subpart A – Credible Evidence.** For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 C.F.R. 60 (condition 17), nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been used.
 13. **NSPS Subpart A – Concealment of Emissions.** No owner or operator subject to the provisions of 40 C.F.R. 60 shall build, erect, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere.
 14. **Reconstruction.** If an owner or operator (i.e. Permittee) of an existing facility proposes to replace components, and the fixed capital cost¹⁰ of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, he shall notify the Administrator (and the Department) of the proposed replacements. The notice must be postmarked 60 days (or as soon as practicable) before construction of the replacements is commenced, and must include the following information:
 - a. The name and address of owner or operator.
 - b. The location of the existing facility.
 - c. A brief description of the existing facility and the components which are to be replaced,
 - d. A description of the existing air pollution control equipment and the proposed air pollution control equipment.
 - e. An estimate of the fixed capital cost of the replacements, and of constructing a comparable entirely new facility,
 - f. The estimated life of the existing facility after the replacements.

¹⁰ *Fixed Capital Cost* means the capital needed to provide all the depreciable components, as defined in 40 C.F.R. 60.15(c), 7/1/01.

- g. A discussion of any economic or technical limitations the facility may have in complying with applicable standards of performance in 40 C.F.R. 60, after the replacements.

Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

15. NSPS Subpart Dc (Reporting and Recordkeeping Only). As indicated in 40 C.F.R. 60.48c(a)(1) and (3), the Permittee for each affected facility (Emission Units 414 and 415) shall:

- 15.1 Submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 C.F.R. 60.7 (condition 8). This notification shall include:
 - a. The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.
 - b. The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.
- 15.2 Record and maintain records of the amounts of each fuel combusted during each day.
- 15.3 Maintain the records required under this condition for a period of two years following the date of such record.

Subpart LL – Standard of Performance for Metallic Mineral Processing Plants

16. Applicability and Designation of Affected Facility.

- 16.1 The provisions of Subpart LL are applicable to the following affected facilities in metallic mineral processing plants: Each crusher and screen in open-pit mines, each crusher, screen, bucket elevator, conveyor belt transfer point, thermal dryer, product packaging station, storage bin, enclosed storage area, truck loading station, truck unloading station, railcar loading station, and railcar unloading station at the mill or concentrator with the following exceptions. All facilities located in underground mines are exempt from the provisions of Subpart LL. At uranium ore processing plants, all facilities subsequent to and including the beneficiation of uranium ore are exempted from the provision of Subpart LL. At the Pogo Mine, Emission Units 533 through 534E are subject to Subpart LL.
- 16.2 An affected facility under 40 C.F.R. 60.380(a) (condition 16.1) that commences construction or modification after August 24, 1982 is subject to requirements of Subpart LL.

17. Standard for Particulate Matter.

- 17.1 On and after the date on which the performance test required to be conducted by 40 C.F.R. 60.8 (condition 10) is completed, no owner or operator (i.e. Permittee) subject to this provision of Subpart LL shall cause to be discharged into the atmosphere from an affected facility any stack emissions that:
- a. Contain particulate matter in excess of 0.05 grams per dry standard cubic meter;
 - b. Exhibit greater than seven percent opacity.
- 17.2 On and after the sixtieth day after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, no owner or operator subject to the provision of this subpart shall cause to be discharged into the atmosphere from an affected facility any process fugitive emissions that exhibit greater than ten percent opacity.

18. Recordkeeping and Reporting Requirements. The owner or operator subject to the provisions of Subpart LL shall conduct a performance test and submit to the Administrator (and the Department) a written report of the results of the test as specified in 40 C.F.R. 60.8(a) (condition 10.1).

19. Test Methods and Procedures.

- 19.1 In conducting the performance tests required in 40 C.F.R. 60.8 (condition 10), the owner or operator shall use a reference methods and procedures the test methods in Appendix A of 40 C.F.R. 60 or other methods and procedures as specified in Subpart LL, except as provided in 40 C.F.R. 60.8(b).
- 19.2 The owner or operator shall determine compliance with the particulate matter standards in 40 C.F.R. 60.382 (condition 17.1) as follows:
- a. Use 40 C.F.R. 60, Appendix A, Method 5 or 17 to determine the particulate matter concentration as described in 40 C.F.R. 60.386(b)(1).
 - b. Use 40 C.F.R. 60, Appendix A, Method 9 and the procedures in 40 C.F.R. 60.11 to determine the opacity from stack emission and process fugitive emissions as described in 40 C.F.R. 60.386(b)(2).

Requirements to Avoid Classification under NSPS Subpart OOO – Standards of Performance for Nonmetallic Mineral Processing Plants

20. Subpart OOO Avoidance. The Permittee shall ensure that Emission Unit CP (portable crusher) meets the definition of portable crusher in 40 CFR 60.671.¹¹

¹¹ *Portable Crusher* as defined in 40 C.F.R. 60.671 means any nonmetallic mineral processing plant that is mounted on any chassis or skids and may be moved by the application of a lifting or pulling force. In addition, there shall be no cable,

Requirements to Avoid Classification as PSD for NO_x and SO₂

- 21. NO_x Emission Limit During Construction.** The Permittee shall limit Nitrogen Oxide (NO_x) emissions from Emission Units 102 through 104, 106 through 108, 110 through 119, 201 through 212, 217 through 219, 401 through 408, and 409 through 411 (all fuel burning equipment plus incinerators) during construction to less than 240 tons per 12-month rolling period. Monitor, record, and report as follows:
- 21.1 Install a dedicated continuous fuel monitoring system for recording fuel consumption that is accurate to within two percent on each unit or group of similar units listed in condition 21, except for Emission Units 217, 218, and 409 through 411.
 - 21.2 For Emission Units 102 through 104, 106 through 108, 110 through 119 and 403 through 408, the Permittee may, as an alternative to condition 21.1, record the amount of fuel delivered to each supply tank, using a fuel monitoring system accurate to within two percent.
 - 21.3 Track monthly fuel consumption for each unit or group of similar units as described in conditions 21.1 and 21.2.
 - 21.4 For Emission Units 217 and 218, the Permittee shall record the operating hours of each emission unit using a dedicated hour meter accurate to within two percent.
 - 21.5 For Emission Units 203 through 205, and 208 through 210, for each group of similar units (same make, model, and configuration), either
 - a. Provide to the Department engine-specific guaranteed vendor NO_x emission data for at least four loads within the normal operating range of the unit within 30 days after the first of similar unit on-site installation date;¹² or
 - b. Conduct NO_x emission source tests following procedures listed in Section 3, on one of similar units. Conduct each source test at three loads within the normal operating range of the unit within 120 days of the first similar unit's startup on-site.

chain, turnbuckle, bolt or other means (except electrical connections) by which any piece of equipment is attached or clamped to any anchor, slab, or structure, including bedrock that must be removed prior to the application of a lifting or pulling force for the purpose of transporting the unit.

¹² This requirement is in addition to the specification sheet requires under condition 1.2.

21.6 Calculate monthly NO_x emissions from each Emission Unit 217 and 218 (NO_{x-217} and NO_{x-218}) using Equation 1:

Equation 1 $NO_x = hr \times EF \times \frac{1 \text{ ton}}{2000 \text{ lb}}$

Where: *NO_x* = NO_x emissions in tons per month

hr = Operating hours per month

EF = NO_x emission factor in pounds per hour using the value in Table 1

21.7 By the 15th of each month, calculate and record the monthly NO_x emissions for the prior month for each unit (or group of units) listed in condition 21, in tons per month using Equation 2, and add to the total for the previous 11 months to get the 12 month rolling total.

Equation 2 $NO_x = FC \times EF \times \frac{1 \text{ ton}}{2000 \text{ lb}} + IE + NO_{x-217} + NO_{x-218}$

Where: *NO_x* = NO_x emissions in tons per month

FC = Fuel consumption in gallons per month

EF = NO_x emission factor in pounds per gallon (lb/gal) using the values in Table 1, except if source tests have been conducted under condition 21.8 for Emission Units 201 through 212. Use the same emission factor for all the units in each group of similar units: 201 and 202, 203 through 205, 206 and 207 (211 and 212), 209 through 210

IE = Incinerator Emissions (Emission Units 409 through 411) in tons per month = 2.1 tons per month during construction

NO_{x-217} = Diesel engine emissions (Emission Unit 217), in tons per month; based on monthly hours of operation.

NO_{x-218} = Diesel engine emissions (Emission Unit 218), in tons per month; based on monthly hours of operation.

Table 1 – NO_x Emission Factors During Construction

Emission Unit	Type	NO _x Emission Factor ^a
102, 115	Various Heaters	14 lb/1000 gal
103 – 114, 116 – 119 and 403 – 408	Various Heaters	20 lb/1000 gal
201 & 202	Generator	0.391 lb/gal

Emission Unit	Type	NO _x Emission Factor ^a
203 – 205	Generator	Worst Case Emission Factor determined under condition 21.4
206 & 207 (211 & 212)	Generator	0.436 lb/gal
208 – 210	Generator	Worst Case Emission Factor determined under condition 21.4
217 & 218	Fi-Fi Pump Diesel	0.031 lb/hr
219	Compressor Diesel	0.612 lb/gal
401 & 402	Generator	0.604 lb/gal

^a Refer to description of *EF* above for exceptions to the lb/gal emission rates.

21.8 Unless source tests have already been conducted under condition 21.4, if the 12 month rolling total NO_x emissions calculated in condition 21.4 exceeds 225 tpy, conduct NO_x emission source tests following procedures listed in Section 3, on one unit of each group of similar units (Emission Unit 201 and 202, 203 through 205, 206 and 207 (211 & 212), and 208 through 210). Conduct each source test at three loads within the normal operating range of the emission units according to Section 3 within 90 days of exceeding 225 tpy.

- a. Monitor and record the fuel consumption rate of each unit during each run of the test.
- b. During the test, collect a fuel sample for each load and group of similar equipment.
- c. Analyze the fuel to determine its higher heating value and specific gravity using ASTM methods incorporated by reference in ASTM 396-62, *Specifications for Fuel Oil*.
- d. Within the test report, document the average firing rate, and fuel specific heat and gravity.
- e. Determine the emission rate (lb/hour) and site-specific emission factor (lb/mmBtu) based on Method 19. If the maximum site-specific emission factor exceeds the values listed in Table 1, recalculate the monthly and 12-month rolling total emission for all periods prior to the source test report deadline, and submit an updated facility operating report for those periods.

21.9 Report as excess emissions under condition 45 if the NO_x emissions calculated under condition 21.4 or 21.8e exceed 240 tpy.

21.10 Include in the operating report required under condition 47:

- a. Monthly fuel use for each unit or group of similar units; and
- b. For each unit or group of similar units, list the monthly and 12-month rolling total NO_x emissions calculated under condition 21.4 or 21.8e.

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- 22. SO₂ Limit During Construction.** The Permittee shall avoid PSD for Sulfur Dioxide (SO₂) during construction by complying with the fuel limits in conditions 28 and 30.
- 23. Fuel Limit During Operation (NO_x).** For Emission Units 208 through 210, the Permittee shall limit combined fuel consumption to 96,831 gallons of distillate fuel per 12 consecutive months during operation. Monitor, record and report as follows:
- 23.1 Using the fuel monitoring system required under condition 21.1, track and record the monthly fuel consumption for Emission Units 208 through 210. By the 15th of each month, calculate and record the monthly fuel consumption in gallons for the previous month, and add to the total for the previous 11 months to get the 12 month rolling total.
- 23.2 Report as excess emissions under condition 45 if the fuel consumption calculated under condition 23.1 exceeds the limit in this condition.

Limit to Avoid Minor Permitting Requirements under 18 AAC 50.502(c)

- 24. Fuel Limit During Construction.** For Units 103 – 111, 117, 118, 119, and 403 – 408 limit the combined distillate fuel usage to no more than 2,005,660 gallons per 12 consecutive months.
- 24.1 Using the fuel monitoring system required under condition 21.1, track and record the monthly fuel consumption. By the 15th of each month, calculate and record the monthly fuel consumption in gallons for the previous month, and add to the total for the previous 11 months to get the 12 month rolling total.
- 24.2 Report as excess emissions under condition 45 if the fuel consumption calculated under condition 24.1 exceeds the limit in this condition.
- 25. Fuel Limit During Operation.** For Emission Units 414 and 415, the Permittee shall limit the combined propane fuel usage to no more than 6,060,197 gallons per 12 consecutive months during operation. Monitor, record and report as follows:
- 25.1 Install a fuel monitoring system for Emission Units 414 and 415. Track and record the monthly fuel consumption for Emission Units 414 and 415. By the 15th of each month, calculate and record the monthly fuel consumption in gallons for the previous month, and add to the total for the previous 11 months to get the 12 month rolling total.
- 25.2 Report as excess emissions under condition 45 if the fuel consumption calculated under condition 25.1 exceeds the limit in this condition.
- 26. Hour Limit During Construction.** For Emission Units 217 and 218, the Permittee shall limit the combined hours of operation to no more than 200 hours per 12 consecutive months during construction.
- 26.1 Before initial start up of Emission Units 217 and 218, equip each of the units with a dedicated engine hour meter.

26.2 Record the hour-meter reading no less than once each calendar month after start up of the Emission Units 217 and 218.

26.3 Report as set out in condition 47, the hourly operation per 12 consecutive months.

27. Hour Limit During Operation. For Emission Unit 218, the Permittee shall limit the hours of operation to no more than 200 hours per 12 consecutive months during operation.

27.1 Before initial start up of Emission Unit 218, equip the unit with a dedicated engine hour meter.

27.2 Record the hour-meter reading no less than once each calendar month after start up of Emission Unit 218.

27.3 Report as set out in condition 47, the hourly operation per 12 consecutive months.

Ambient Air Quality Protection Requirements

28. Fuel Limit During Construction. For the emission units shown in Table 2, the Permittee shall not cause or allow fuel consumption to exceed the limits shown in Table 2 during construction. Monitor, record and report as follows:

Table 2 – Fuel Limits During Construction

Emission Unit	Type	Fuel Limit (gallon/12 month period)
103 – 111, 117, & 403 – 408	Heater	1,933,533
201 & 202	Generator	69,500
203 – 205	Generator	781,960
206 & 207 (211 & 212)	Generator	97,573
208 - 210	Generator	519,217
401 & 402	Generator	71,894
219	Compressor Diesel Engine	12,085

28.1 Using the fuel monitoring system required in condition 21.1, track and record the monthly fuel consumption for the emission units shown in Table 2. By the 15th of each month, calculate and record the monthly fuel consumption for group of units in gallons, and add to the total for the previous 11 months to get the 12 month rolling total.

28.2 Report as excess emissions under condition 45 if the fuel consumption calculated under 28.1 exceeds a limit shown in Table 2.

29. Fuel Limit during Operation.

- 29.1 For Emission Units 208 through 210, the Permittee shall limit combined fuel consumption to 96,831 gallons of distillate fuel per 12 consecutive months during operation.
- 29.2 Monitor, record and report as indicated in condition 23.

30. SO₂ Limit. The Permittee shall restrict fuel sulfur content as follows:

- 30.1 For Emission Units 103, 104, 106 through 108, 110 through 114, 116 through 119, 201 through 219, 401 through 408, 412 and 413 (all distillate fuel-, and used oil-fired units, including non-road engines), do not allow distillate fuel sulfur content to exceed 0.5 percent by weight at any time. Verify compliance as required by condition 6.1.
- 30.2 For Emission Units 102, 115, 414, 415, and 542 through 545 use only LPG as fuel. Verify compliance as required by condition 6.2.

31. Public Access Control Plan. The Permittee shall comply with the provisions of the Public Access Control Plan contained in the application dated April 2003 and as follows:

- 31.1 The ambient air boundary shall be completely within the Millsite Lease Boundary established by the Alaska Department of Natural Resources.
- 31.2 Do not revise the ambient air boundary without Department approval. Submit changes to the ambient air boundary, along with a revised ambient air impact analysis, to the Department prior to any changes in the ambient air boundary.
- 31.3 Do not revise the Public Access Control Plan without Department concurrence. Submit revisions to the Public Access Control Plan (other than changes to the Ambient Air Boundary) to the Department's compliance assurance group for approval prior to implementing changes to the plan.

32. General Ambient Air Requirements. The Permittee shall:

- 32.1 Build the stationary source (including the exhaust stacks) as proposed in the 2003 application; and
- 32.2 Use water spray dust controls after blasting.

Section 3. General Source Testing and Monitoring Requirements

- 33. Requested Source Tests.** In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.
- 34. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing:
- 34.1 At a point or points that characterize the actual discharge into the ambient air; and
 - 34.2 At the maximum rated burning or operating capacity of the source or another rate determined by the Department to characterize the actual discharge into the ambient air.
- 35. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:
- 35.1 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in 40 C.F.R. 60, Appendix A, Reference Method 9. The Permittee may use the form in Exhibit B of this permit to record data.
 - 35.2 Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.
 - 35.3 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Methods 201 or 201A and 202.
 - 35.4 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.
- 36. Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).
- 37. Test Exemption.** The Permittee is not required to comply with conditions 39, 40 and 41 when the exhaust is observed for visible emissions by Method 9 Plan (condition 4.1b)
- 38. Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.

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39. **Test Plans.** Except as provided in condition 37, before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the source will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under condition 33 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.
 40. **Test Notification.** Except as provided in condition 37, at least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.
 41. **Test Reports.** Except as provided in condition 37, within 60 days after completing a source test, the Permittee shall submit two copies of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in condition 61. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.
 42. **Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in condition 5, the three-hour average is determined using the average of three one-hour test runs.

Section 4. General Recordkeeping, Reporting, and Compliance Certification Requirements

- 43. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall send two copies of reports, compliance certifications, and other submittals required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician. The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, emission source test reports, or other records under a cover letter certified in accordance with condition 61.
- 44. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:
- 44.1 Copies of all reports and certifications submitted pursuant to this section of the permit; and
- 44.2 Records of all monitoring required by this permit, and information about the monitoring including:
- a. Calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
 - b. Sampling dates and times of sampling or measurements;
 - c. The operating conditions that existed at the time of sampling or measurement;
 - d. The date analyses were performed;
 - e. The location where samples were taken;
 - f. The company or entity that performed the sampling and analyses;
 - g. The analytical techniques or methods used in the analyses; and
 - h. The results of the analyses.
- 45. Excess Emissions and Permit Deviation Reports.**
- 45.1 Except as provided in condition 53, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:
- a. In accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report
 - (i) Emissions that present a potential threat to human health or safety; and
 - (ii) Excess emissions that the Permittee believes to be unavoidable;

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- b. In accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;
 - c. Report all other excess emissions and permit deviations
 - (i) Within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in condition 45.1c(ii); and
 - (ii) If a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under condition 45.1c(i).
- 45.2 The Permittee must report using either the form contained in Exhibit C of this permit, or a Department-approved substitute (electronic or hardcopy). The Permittee must provide all information called for by the form that is used.
- 45.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.
- 46. NSPS and NESHAP Reports.** The Permittee shall:
- 46.1 attach to the operating report required by condition 47, copies of any NSPS reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10 as required by conditions 8 and 15.1; and
 - 46.2 upon request by the Department, notify and provide a written copy of any EPA-granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.
- 47. Operating Reports.** During the life of this permit, the Permittee shall submit to the Department one original and one copy of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.
- 47.1 The operating report must include all information required to be in operating reports by other conditions of this permit.
 - 47.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 47.1, either
 - a. The Permittee shall identify
 - (i) The date of the deviation;
 - (ii) The equipment involved;
 - (iii) The permit condition affected;

- (iv) A description of the excess emissions or permit deviation; and
 - (v) Any corrective action or preventive measures taken and the date of such actions;
or
- b. When excess emissions or permit deviations have already been reported under condition 45 the Permittee may cite the date or dates of those reports.

Section 5. Standard Conditions

48. Assessable Emissions. The Permittee shall pay to the Department an annual emission fee based on the facility's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air contaminant that the stationary source emits or has the potential to emit in quantities greater than 10 tpy. The quantity for which fees will be assessed is the lesser of

48.1 The stationary source's assessable potential to emit of

- a. 1,239 tpy during construction; and
- b. 444 tpy during operation; or

48.2 The stationary source's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the Department, when demonstrated by

- a. An enforceable test method described in 18 AAC 50.220;
- b. Material balance calculations;
- c. Emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
- d. Other methods and calculations approved by the Department.

49. Assessable Emission Estimates. Emission fees will be assessed as follows:

49.1 No later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 610 University Avenue, Fairbanks, AK 99709-3643, the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or

49.2 If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set forth in condition 48.1.

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- 50. Good Air Pollution Control Practice.** The Permittee shall do the following for all Emission Units listed in Table A-1, except for Emission Units 414, 415, 533, and 534A through 534E:
- 50.1 Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
 - 50.2 Keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
 - 50.3 Keep a copy of either the manufacturer's or the operator's maintenance procedures.
- 51. Reasonable Precautions to Prevent Fugitive Dust.** A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.
- 51.1 Keep records of
 - a. Complaints received by the Permittee and complaints received by the Department and conveyed to the Permittee; and
 - b. Any additional precautions that are taken
 - (i) To address complaints described in condition 51.1 or to address the results of Department inspections that found potential problems; and
 - (ii) To prevent future dust problems.
 - 51.2 Report according to condition 53.
- 52. Fugitive Dust Requirements.** In addition to the general requirements for controlling fugitive dust listed in condition 51, the Permittee shall comply with the following requirements specific to the Pogo Mine Project.
- 52.1 Perform a daily inspection of all unpaved roads (Emission Units 535 through 539), temporary ore stockpiles and rock storage areas, drystack tailings facility, and gravel pits for fugitive dust. If dust is present, and the road or stockpile is unfrozen, apply water or suitable dust suppression chemicals on roads and stockpiles, or cover the stockpiles. Maintain a log of daily inspection and actions to keep dust down. Keep the records for five years.
 - 52.2 For the baghouses on Emission Units 528, 532 through 534, ALAB and ALAB4:
 - a. Monitor the pressure drop across each baghouse daily to ensure that it is within the limits recommended by the manufacturer.

- b. Inspect each baghouse prior to initial startup, whenever the pressure drop across the baghouse is not within the limits recommended by the manufacturer, and every 180 days of operation. Replace worn or damaged bags prior to restarting the baghouse or within 72 hours of discovery, whichever occurs later.
 - c. Maintain maintenance logs detailing pressure drop across baghouse, baghouse inspections, and bag replacements. Keep records for five years.
- 52.3 During construction, use water control techniques to control dust on Emission Units 501 and 502, 506 and 507, and 511 through 513 (underground material transfer units).
- 52.4 During operation, use water control techniques to control dust on Emission Units 517 through 525 (underground material transfer units).
- 53. Air Pollution Prohibited.** No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.
- 53.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to condition 45.
- 53.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of condition 53.
- 53.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
- a. After an investigation because of a complaint or other reason, the Permittee believes that emissions from the facility have caused or are causing a violation of condition 53; or
 - b. The Department notifies the Permittee that it has found a violation of condition 53.
- 53.4 The Permittee shall keep records of
- a. The date, time, and nature of all emissions complaints received;
 - b. The name of the person or persons that complained, if known;
 - c. A summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of condition 53; and
 - d. Any corrective actions taken or planned for complaints attributable to emissions from the facility.

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- 53.5 With each stationary source operating report under condition 47, the Permittee shall include a brief summary report which must include
- a. The number of complaints received;
 - b. The number of times the Permittee or the Department found corrective action necessary;
 - c. The number of times action was taken on a complaint within 24 hours; and
 - d. The status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.
- 53.6 The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.
54. The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for
- 54.1 An enforcement action; or
 - 54.2 Permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
55. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
56. Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.
57. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
58. The permit does not convey any property rights of any sort, nor any exclusive privilege.
59. The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to
- 59.1 Enter upon the premises where an emission unit subject to the permit is located or where records required by the permit are kept;
 - 59.2 Have access to and copy any records required by the permit;

59.3 Inspect any facility, equipment, practices, or operations regulated by or referenced in the permit; and

59.4 Sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

60. Information Requests. The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.

61. Certification. The Permittee shall certify all reports, compliance certifications, or other documents submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.

61.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if

- a. A certifying authority registered under AS 09.25.510 verifies that the electronic signature is authentic; and
- b. The person providing the electronic signature has made an agreement, with the certifying authority described in condition 61.1a, that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.

Section 6. Permit Documentation

December, 2005	AQC Minor Permit Application for the Pogo Mine Project, prepared for Teck-Pogo Inc., by Hoefler Consulting Group.
January 13, 2006	Email from Al Trbovich to Kathy Stringham containing a PDF copy of the November 2004 minor permit application for the Pogo Mine Project. A hard copy of the application and a hard copy of subsequent correspondence with the Department (Albert Faure) will follow via Priority Mail.
February 7, 2006	The Department reviewed Teck's December 2005 minor permit application and found that work on this permit can not progress until the potential to emit information Teck discussed with Kathy Stringham on February 3rd is provided. Therefore, the Department is discontinuing work on writing this permit effective February 7, 2006.
February 22, 2006	Received updated application information.
March 28, 2006	Email from Karl Hanneman to Kathy Stringham verifying PTE information in responses to Department questions and comments on application.
April 3, 2006	Email from Karl Hanneman to Kathy Stringham explaining that the PM-10 error in the application does not have any significance with respect to permit applicability because, in the case of the Pogo Mine Project, fugitive emissions do not count toward determining whether a PSD or minor permit is required. This error also does not have any significance with respect to the ambient air quality analysis because all of the fugitive PM-10 emissions from all of the roads listed in Table E-7 were included in the modeling analysis.
June 6, 2006	Unofficial comments on permit prepared by Karl Hanneman.
June 20, 2006	Email from Al Trbovich to Sally Ryan answering questions on Permit No. AQ0406MSS02.
June 22, 2006	Email from Al Trbovich to Sally Ryan containing emission spreadsheet.
June 23, 2006	Email from Al Trbovich to Sally Ryan answering questions on Permit No. AQ0406MSS02.
July 11, 2006	Telephone conversation between Karl Hanneman and Sally Ryan regarding portable crusher.
September 26, 2006	AQC Minor Permit Application to clarify Minor Permit No. AQ0406MSS02.

EXHIBIT A
EMISSION UNIT INVENTORY TABLE

Table A-1 – Emission Unit Inventory¹

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
102	Various Heaters	TBD	300 Man Construction Camp	Propane	6 mmBtu/hr	TBD	Yes	Yes
103	Heater	TBD	1525 Maintenance Shop	Distillate or Used Oil	0.35 mmBtu/hr	TBD	Yes	Yes
104	Various Heaters	TBD	Water Treatment Plant	Distillate	3.2 mmBtu/hr	TBD	Yes	Yes
106	Various Heaters	TBD	Mill Building	Distillate	14.2 mmBtu/hr	TBD	Yes	Yes
107	Various Heaters	TBD	Filter/Backfill Plant	Distillate	4 mmBtu/hr	TBD	Yes	Yes
108	Various Heaters	TBD	Permanent Camp	Distillate	7.5 mmBtu/hr	TBD	Yes	Yes
110	Various Heaters	TBD	Truck Shop Complex	Distillate or Used Oil	6.6 mmBtu/hr	TBD	Yes	Yes
111	Heater	TBD	Sewage Treatment Plant	Distillate	1.7 mmBtu/hr	TBD	Yes	Yes
112	Heater	TBD	First Aid Building	Distillate	0.075 mmBtu/hr	TBD	Yes	No
113	Heater	TBD	Portable Water Treatment	Distillate	0.04 mmBtu/hr	TBD	Yes	Yes
114	Various Heater	TBD	Lower construction offices	Distillate	0.3 mmBtu/hr	TBD	Yes	No
115	Various Heaters	TBD	Fire Water Building, Construction Camp	Propane	0.092 mmBtu/hr	TBD	Yes	No
116	Various Heaters	TBD	Sewage Treatment Plant	Distillate	0.9 mmBtu/hr	TBD	Yes	Yes
117	Various Heaters	TDB	Concrete Batch Plant	Distillate	2.0 mmBtu/hr	TBD	Yes	No
118	Various Heaters	TBD	Construction ESB	Distillate	0.368 mmBtu/hr	TBD	Yes	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
119	Various Heaters	TBD	Mill Bench, Construction Office	Distillate	0.76 mmBtu/hr	TBD	Yes	Yes
201	Generator	Caterpillar D-3412C	1525 Portal Existing Generator No. 1	Distillate	668 hp	1998	Yes	No
202	Generator	Caterpillar D-3412C	1525 Portal Existing Generator No. 2	Distillate	668 hp	1998	Yes	No
203	Generator	TBD	Construction Camp Bank Unit No. 1	Distillate	1,227 hp	TBD	Yes	No
204	Generator	TBD	Construction Camp Bank Unit No. 2	Distillate	1,227 hp	TBD	Yes	No
205	Generator	TBD	Construction Camp Bank Unit No. 3	Distillate	1,227 hp	TBD	Yes	No
206 (211)	Generator	Komatsu NL6149-A	Airstrip-Batch Plant Unit No.1	Distillate	680 hp	1998	Yes	No
207 (212)	Generator	Komatsu NL6149-A	Airstrip-Batch Plant Unit No. 2	Distillate	680 hp	1998	Yes	No
208	Generator	TBD	Mill Bench Unit Bank Unit No. 1	Distillate	1,227 hp	TBD	Yes	Yes
209	Generator	TBD	Mill Bench Unit Bank Unit No. 2	Distillate	1,227 hp	TBD	Yes	Yes
210	Generator	TBD	Mill Bench Unit Bank Unit No. 3	Distillate	1,227 hp	TBD	Yes	Yes
213 ²	Portable Generator	TBD	1690 Portal/Backup	Distillate	1,220 hp	TBD	Yes	No
214 ²	Portable Generator	TBD	1690 Portal/Primary	Distillate	1,220 hp	TBD	Yes	No
215 ²	Portable Generator	TBD	1875 Portal/Backup	Distillate	1,220 hp	TBD	Yes	No
216 ²	Portable Generator	TBD	1875 Portal/Primary	Distillate	1,220 hp	TBD	Yes	No

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
217	Fi-Fi Pump Engine	Clarke Diesel VMPPF-04HN	Construction Fire Water Building	Distillate	56 bhp	TBD	Yes	No
218	Fi-Fi Pump Engine	Clarke Diesel VMPPF-L6HR	Permanent Fire Water Pump Building	Distillate	165 bhp	TBD	Yes	Yes
219	Compressor Engine	Atlas Copco NAS 90 Air Compressor Diesel engine driven	Batch Plant	Distillate	90 hp	TBD	Yes	No
301	Explosives	TBD	Exhaust from 1525 Portal/Underground	N/A	1,831 lb/day	TBD	Yes	No
302	Explosives	TBD	Exhaust from 1690 Portal/Underground	N/A	1,831 lb/day Const (7,150 lb/day Operation)	TBD	Yes	Yes
304	Explosives	TBD	Exhaust from 1875 Portal/Underground	N/A	1,831 lb/day	TBD	Yes	No
401	Generator	Caterpillar D-3306	1525 Mine Air Compressor No. 1	Distillate	170 hp	1998	Yes	No
402	Generator	Caterpillar D-3306	1525 Mine Air Compressor No. 2	Distillate	170 hp	1998	Yes	No
403	Heater	TBD	1525 Mine Air Heater No. 1	Distillate	0.42 mmBtu/hr	TBD	Yes	No
404	Heater	TBD	1525 Mine Air Heater No. 2	Distillate	0.42 mmBtu/hr	TBD	Yes	No
405	Heater	TBD	1690 Portal Mine Air Heater No. 1	Distillate	0.42 mmBtu/hr	TBD	Yes	No
406	Heater	TBD	1690 Portal Mine Air Heater No. 2	Distillate	0.42 mmBtu/hr	TBD	Yes	No
407	Heater	TBD	1875 Portal Mine Air Heater No. 1	Distillate	0.42 mmBtu/hr	TBD	Yes	No
408	Heater	TBD	1875 Portal Mine Air Heater No. 2	Distillate	0.42 mmBtu/hr	TBD	Yes	No
409	Incinerator	TBD	Existing Camp	Solid Waste	50 lb/hr	TBD	Yes	No

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
410	Incinerator	TBD	Construction Camp	Solid Waste	130 lb/hr	TBD	Yes	Yes
411	Incinerator	TBD	Permanent Camp	Solid Waste	130 lb/hr	TBD	Yes	Yes
412 ²	Light Plant	TBD	Light Plant No. 1	Distillate	180 KW	TBD	No	Yes
413 ²	Light Plant	TBD	Light Plant No. 2	Distillate	15 KW	TBD	No	Yes
414	Heater	TBD	1875 Mine Air Heater No. 1	LPG	42.2 mmBtu/hr	TBD	No	Yes
415	Heater	TBD	1875 Mine Air Heater No. 2	LPG	42.2 mmBtu/hr	TBD	No	Yes
501	Material Transfer	N/A	Underground-1525 Portal, LHD to Remuck	N/A	514 tpd	TBD	Yes	No
502	Material Transfer	N/A	Underground-1525 Portal, LHD to Truck	N/A	514 tpd	TBD	Yes	No
503	Material Transfer	N/A	Underground-1525 Portal, Truck to Pad	N/A	514 tpd	TBD	Yes	No
504	Material Transfer	N/A	Underground-1525 Portal, FEL to Truck	N/A	514 tpd	TBD	Yes	No
505	Material Transfer	N/A	Underground-1525 Portal, Truck to Pads	N/A	514 tpd	TBD	Yes	No
506	Material Transfer	N/A	Underground-1690 Portal, LHD to Remuck	N/A	514 tpd	TBD	Yes	No
507	Material Transfer	N/A	Underground-1690 Portal, LHD to Truck	N/A	514 tpd	TBD	Yes	No
508	Material Transfer	N/A	Underground-1690 Portal, Truck to Pad	N/A	514 tpd	TBD	Yes	No
509	Material Transfer	N/A	Underground-1690 Portal, FEL to Truck	N/A	514 tpd	TBD	Yes	No
510	Material Transfer	N/A	Underground-1690 Portal, Truck to RTP	N/A	514 tpd	TBD	Yes	No
511	Material Transfer	N/A	Underground-1875 Portal, LHD to Remuck	N/A	514 tpd	TBD	Yes	No

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
512	Material Transfer	N/A	Underground-1875 Portal, LHD to Truck	N/A	514 tpd	TBD	Yes	No
513	Material Transfer	N/A	Underground-1875 Portal, Truck to Pad	N/A	514 tpd	TBD	Yes	No
514	Material Transfer	N/A	Underground-1875 Portal, FEL to Truck	N/A	514 tpd	TBD	Yes	No
515	Material Transfer	N/A	Underground-1875 Portal, Truck to RTP	N/A	514 tpd	TBD	Yes	No
516	Material Transfer	N/A	Aboveground-Concrete Batch Plant	N/A	10 tpd	TBD	Yes	Yes
517	Material Transfer	N/A	Underground-1875 Development Truck to Surface	N/A	2,822 tpd	TBD	No	Yes
518	Material Transfer	N/A	Underground-1310 Development LHD to Remuck	N/A	1,411 tpd	TBD	No	Yes
519	Material Transfer	N/A	Underground-1310 Development Remuck LHD to Truck	N/A	1,411 tpd	TBD	No	Yes
520	Material Transfer	N/A	Underground-1690 Development LHD to Remuck	N/A	1,411 tpd	TBD	No	Yes
521	Material Transfer	N/A	Underground-1310 Development Remuck LHD to Truck	N/A	1,411 tpd	TBD	No	Yes
522	Material Transfer	N/A	Underground-1310 Ore LHD to Remuck	N/A	1,750 tpd	TBD	No	Yes
523	Material Transfer	N/A	Underground-1310 Ore Remuck to Truck	N/A	1,750 tpd	TBD	No	Yes
524	Material Transfer	N/A	Underground-1690 Ore LHD to Remuck	N/A	1,750 tpd	TBD	No	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
525	Material Transfer	N/A	Underground-1690 Ore Remuck to Truck	N/A	1,750 tpd	TBD	No	Yes
528	Baghouse	N/A	Underground Apron Feeder No. 1	N/A	2,500 cfm	TBD	No	Yes
530	N/A	N/A	Aboveground-1875 Development FEL to Truck	N/A	2,822 tpd	TBD	No	Yes
531	N/A	N/A	Aboveground-1875 Truck to Drystack	N/A	2,822 cfm	TBD	No	Yes
532	Baghouse	N/A	Backfill Plant Cement Silo	N/A	750 cfm	TBD	No	Yes
532A	Baghouse	TBD	Cement Screw Conveyor	N/A	3,000 cfm	TBD	No	Yes
533	Baghouse	N/A	Conveyor to Surface Coarse Ore Bin/Above Ground	N/A	1,500 cfm	TBD	No	Yes
534	Baghouse	N/A	Surface Coarse Ore Bin Apron Feeder/Above Ground	N/A	5,000 cfm	TBD	No	Yes
534A	Bin	N/A	Surface Coarse Ore Bin	N/A	1,000 tons	TBD	No	Yes
534B	Conveyor	N/A	Conveyor to SAG Mill/Above Ground	N/A	150 tph	TBD	No	Yes
534C	Screen	N/A	Gravity Feed Screens (two)	N/A	500 tph	TBD	No	Yes
534D	Screen	N/A	Trash Screen	N/A	15 tph	TBD	No	Yes
534E	Screen	N/A	Safety Screen	N/A	15 tph	TBD	No	Yes
534F	Tank Exhaust	N/A	Electrowinning cell	N/A	4,500 cfm	TBD	No	Yes
534G	Tank Exhaust	N/A	Acid Wash Tank	N/A	500 cfm	TBD	No	Yes
534H	Tank Exhaust	N/A	Reagent Tank	N/A	1,750 cfm	TBD	No	Yes
534I	Tank Exhaust	N/A	Liming Mixing and Tank	N/A	500 cfm	TBD	No	Yes
534J	Tank Exhaust	N/A	Cyanide Mixing and Holding Tank	N/A	750 cfm	TBD	No	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
535	Roads	N/A	Haul Truck-BF Plant to Drystack	N/A	N/A	TBD	No	Yes
536	Roads	N/A	Haul Truck- Waste Stockpile to Drystack	N/A	N/A	TBD	No	Yes
537	Roads	N/A	Misc. Pickup Truck Trips	N/A	N/A	TBD	No	Yes
538	Roads	N/A	Misc. Cargo Truck Trips	N/A	N/A	TBD	No	Yes
539	Roads	N/A	Misc. Bus Trips	N/A	N/A	TBD	No	Yes
540	Scrubber	Ducon Venture Packed Tower Scrubber	Smelting Furnace	N/A	2,500 cfm	TBD	No	Yes
541	Scrubber	Lochhead-Haggerty Scrubber	Electric Carbon Kiln	N/A	800 cfm	TBD	No	Yes
542	Propane Vaporizer	TBD	1875 Portal	Propane	1.0 mmBtu/hr	TBD	No	Yes
543	Propane Vaporizer	TBD	1875 Portal	Propane	1.0 mmBtu/hr	TBD	No	Yes
544	Propane Vaporizer	TBD	1520 Portal	Propane	1.0 mmBtu/hr	TBD	No	Yes
545	Propane Vaporizer	TBD	1525 Portal	Propane	1.0 mmBtu/hr	TBD	No	Yes
ALAB	Baghouse	N/A	Assay Lab	N/A	8,500 cfm	TBD	No	Yes
ALAB2	Scrubber	LIMITS Scrubber	Assay Lab	N/A	3,000 cfm	TBD	No	Yes
ALAB3	Scrubber	TBD	Assay Lab	N/A	800 cfm	TBD	No	Yes
ALAB4	Baghouse	TBD	Assay Lab	N/A	10,000 cfm	TBD	No	Yes
ELAB	Scrubber	TBD	Environmental Lab	N/A	1,200 cfm	TBD	No	Yes
CP	N/A	N/A	Aboveground Portable Crusher	N/A	125 tons/hr	TBD	Yes	Yes
AST-01	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
AST-02	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-03	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-04	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-05	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-06	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-07	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-08	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-09	Storage Tank	N/A	Helicopter Containment Area	Jet A	15,000 gal	TBD	Yes	Yes
AST-10	Storage Tank	N/A	Helicopter Containment Area	Jet A	15,000 gal	TBD	Yes	Yes
AST-11	Storage Tank	N/A	Unit 211, 212 Supply	Distillate	2,500 gal	TBD	Yes	Yes
AST-12	Storage Tank	N/A	Not in use	Distillate	2,500 gal	TBD	Yes	Yes
AST-13	Storage Tank	N/A	Not in use	Distillate	3,000 gal	TBD	Yes	Yes
AST-14	Storage Tank	N/A	Exploration Portal	Distillate	1,500 gal	TBD	Yes	Yes
AST-15	Storage Tank	N/A	Unit 103 Supply	Distillate or used oil	300 gal	TBD	Yes	Yes
AST-25	Storage Tank	N/A	Unit 410 Supply	Distillate	630 gal	TBD	Yes	Yes
AST-26	Storage Tank	N/A	Unit 111 Supply	Distillate	1,000 gal	TBD	Yes	Yes
AST-27	Storage Tank	N/A	Unit 116 Supply	Distillate	500 gal	TBD	Yes	Yes
AST-28	Storage Tank	N/A	Mill Bench Construction Office	Distillate	500 gal	TBD	Yes	Yes
AST-29	Storage Tank	N/A	Unit 112 Supply	Distillate	200 gal	TBD	Yes	Yes
AST-30	Storage Tank	N/A	Unit 114 Supply	Distillate	300 gal	TBD	Yes	Yes
AST-31	Storage Tank	N/A	Unit 208 Supply	Distillate	1,115 gal	TBD	Yes	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
AST-32	Storage Tank	N/A	Unit 217 Supply	Distillate	120 gal	TBD	Yes	Yes
AST-33	Storage Tank	N/A	Unit 203 Supply	Distillate	2,160 gal	TBD	Yes	Yes
AST-34	Storage Tank	N/A	Unit 204 Supply	Distillate	2,160 gal	TBD	Yes	Yes
AST-35	Storage Tank	N/A	Unit 113 and Unit 118 Supply	Distillate	300 gal	TBD	Yes	Yes
AST-36	Storage Tank	N/A	Main Containment Area	Distillate	20,000 gal	TBD	Yes	Yes
AST-37	Storage Tank	N/A	Exploration Portal	Distillate	2,500 gal	TBD	Yes	Yes
AST-38	Storage Tank	N/A	Process Plant and Filter Backfill Plant	Distillate	20,000 gal	TBD	Yes	Yes
AST-39	Storage Tank	N/A	Mine services Complex	Distillate	20,000 gal	TBD	Yes	Yes
AST-40	Storage Tank	N/A	Mine Services Complex	Distillate	20,000 gal	TBD	Yes	Yes
AST-41	Storage Tank	N/A	Mine Services Complex	Used Oil	5,000 gal	TBD	Yes	Yes
AST-42	Storage Tank	N/A	Mine Services Complex	Gasoline	500 gal	TBD	Yes	Yes
AST-43	Storage Tank	N/A	Permanent Camp	Distillate	20,000 gal	TBD	Yes	Yes
AST-44	Storage Tank	N/A	Airstrip	Jet A	5,000 gal	TBD	Yes	Yes
AST-45	Storage Tank	N/A	Batch Plant	Distillate	1,000 gal	TBD	Yes	Yes
AST-46	Storage Tank	N/A	Unit 115E Supply	Distillate	500 gal	TBD	Yes	Yes
AST-47	Storage Tank	N/A	Unit 115F Supply	Distillate	TBD	TBD	Yes	Yes
AST-48	Storage Tank	N/A	Unit 411 Supply	Distillate	500 gal	TBD	Yes	Yes
AST-49	Storage Tank	N/A	Unit 218 Supply	Distillate	300 gal	TBD	Yes	Yes
LPG-01	Storage Tank	N/A	Unit 102 Supply	Propane	18,000 gal	TBD	Yes	Yes
LPG-02	Storage Tank	N/A	Unit 102 Supply	Propane	18,000 gal	TBD	Yes	Yes
LPG-03	Storage Tank	N/A	Unit 102 Supply	Propane	18,000 gal	TBD	Yes	Yes
LPG-04	Storage Tank	N/A	Unit 115 Supply	Propane	500 gal	TBD	Yes	Yes

Emission Unit ID	Unit Type	Make & Model	Location/Other Description	Fuel	Max. Capacity	Installation Date	Unit During Construction	Unit During Operation
LPG-05	Storage Tank	N/A	Unit 115 Supply	Propane	500 gal	TBD	Yes	Yes
LPG-10	Storage Tank	N/A	Permanent Camp	Propane	5,000 gal	TBD	Yes	Yes
LPG-11	Storage Tank	N/A	Exploration Portal	Propane	50,000 gal	TBD	Yes	Yes
LPG-12	Storage Tank	N/A	1875 Portal	Propane	50,000 gal	TBD	Yes	Yes

TBD means "To Be Determined", N/A means "Not Applicable", LHD means "load, haul, and dump", FEL means "Front End Loader", and RTP means "recycle tailings pond"

Footnotes:

¹ The information in these tables is for identification purposes only

² Nonroad Engine

EXHIBIT B

VISIBLE EMISSIONS FORMS

Visible Emissions Field Data Sheet

Certified Observer: _____

Company & Facility: _____

Location: _____

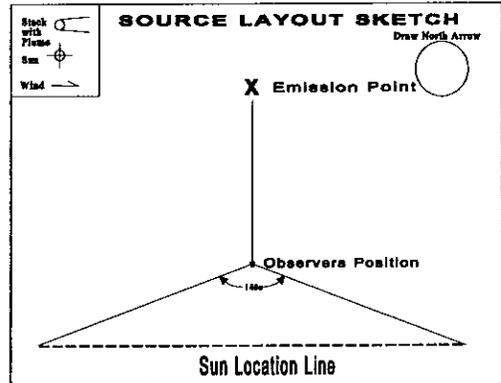
Test No.: _____ Date: _____

Source: _____

Production Rate/Operating Rate: _____

Unit Operating Hours: _____

Hrs. of observation: _____



Clock Time	Initial				Final
Observer location Distance to discharge					
Direction from discharge					
Height of observer point					
Background description					
Weather conditions Wind Direction					
Wind speed					
Ambient Temperature					
Relative humidity					
Sky conditions: (clear, overcast, % clouds, etc.)					
Plume description: Color					
Distance visible					
Water droplet plume? (Attached or detached?)					
Other information					

EXHIBIT C
ADEC NOTIFICATION FORM

ADEC Notification Form

Stationary Source Name		Air Quality Permit Number
Company Name		

When did you discover the Excess Emissions/Permit Deviation?

Date: / / Time: : :

When did the event/deviation occur?

Begin Date: / / Time: : (please use 24hr clock)
 End Date: / / Time: : (please use 24hr clock)

What was the duration of the event/deviation?: : (hrs:min) or days
 (total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

Reason for Notification: (please check only 1 box and go to the corresponding section)

- Excess Emissions - Complete Section 1 and Certify.
- Deviation from Permit Condition - Complete Section 2 and Certify
- Deviations from COBC, CO, or Settlement Agreement - Complete Section 2 and Certify

Section 1. Excess Emissions

- (a) Was the exceedance: Intermittent Continuous
- (b) Cause of Event (Check one that applies):

<input type="checkbox"/> Start Up /Shut	<input type="checkbox"/> Natural Cause (weather/earthquake/flood)
<input type="checkbox"/> Control Equipment Failure	<input type="checkbox"/> Scheduled Maintenance/Equipment Adjustment
<input type="checkbox"/> Bad fuel/coal/gas	<input type="checkbox"/> Upset Condition <input type="checkbox"/> Other

(c) Description

Describe briefly, what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance.

(d) Emissions Units Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the permit. Identify each emission standard potentially exceeded during the event and the exceedance.

Unit ID	Unit Name	Permit Condition Exceeded/Limit/Potential Exceedance

(e) Type of Incident (Please Check only one).

- Opacity _____ %
- Fugitive Emissions
- Marine Vessel Opacity
- Other: _____
- Venting _____ (gas/scf)
- Emission Limit Exceeded
- Failure to monitor/report
- Control Equipment Down
- Record Keeping Failure
- Flaring

(f) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Do you intend to assert the affirmative defense of 18 AAC 50.235?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

Certify Report (go to end of form)

Section 2 Permit Deviations

(a) Permit Deviation Type (check one only box, corresponding with the section in the permit).

- Emission Unit Specific
- General Source Test/Monitoring Requirements
- Recordingkeeping/Reporting/Compliance Certification
- Standard Conditions Not Included in Permit
- Generally Applicable Requirements
- Reporting/Monitoring for Diesel Engines
- Insignificant Emission Unit
- Stationary Source Wide

<input type="checkbox"/> Other Section		(title of section and section number of your permit).
--	--	---

(b) Emission Unit Involved.

Identify the emission unit involved in the event, using the same identification number and name

Unit ID	Unit Name	Permit Condition / Potential Deviation

as in the permit. List the corresponding permit conditions and the deviation.

(c) Description of Potential Deviation:

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation.

(d) Corrective Actions:

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence.

Certification:

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____ Title: _____ Date: _____

Signature: _____ Phone Number: _____

To Submit this Report:

Fax to: 907-451-2187;

Email to: airreports@dec.state.ak.us - *if emailed, the report must be certified within the Operating Report required for the same reporting period per Condition 47;*

Mail to: ADEC, Air Permits Program, 610 University Avenue, Fairbanks, AK 99709-3643;

Phone Notification: 907-451-5173 - *phone notifications require a written follow-up report within the deadline listed in Condition 45; OR*

Online Submission: *(Website is not yet available) - if submitted online, the report must be certified within the Operating Report required for the same reporting period per Condition 47.*