



REGION 10
SEATTLE, WA 98101

June 2, 2026

Ms. Emily Gibson
Corporate Director of Sustainability and Strategic Initiatives
UniSea, Inc.
15400 Northeast 90th St.
P.O. Box 97019
Redmond, Washington 98073

Dear Ms. Gibson:

This letter responds to UniSea, Inc.'s (UniSea) February 19, 2026, letter to the U.S. Environmental Protection Agency Region 10 Office requesting a delay in initial performance testing for two boilers subject to 40 CFR part 63, subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources ("NESHAP 6J") located at UniSea's fish processing plant in Dutch Harbor, Alaska. Based on the information provided, the boilers are not subject to an emission limit at this time for the combustion of fish oil, and, therefore, the EPA is not requiring testing. If the EPA requires testing in the future, this letter details several compliance options.

Background

UniSea's letter describes off-permit changes made to its part 70 permit (AQ0088TVP05) from the Alaska Department of Environmental Conservation, replacing two meal plant driers (emission unit (EU) IDs 14 & 15) with new, more efficient liquid fuel-fired boilers (EU IDs 14a & 15a) that commenced operation on December 8, 2025. The boilers have a heat input capacity of 10 million British thermal units per hour or greater when fired on either ultra-low sulfur diesel or fish oil. The combustion of fish oil would subject the boilers to an emission limit for particulate matter of 3.0E-02 pounds per million Btu. See Table 1 of NESHAP 6J.

Additionally, UniSea's letter states that EU IDs 14a and 15a, commissioned on ULSD, have operated entirely on ULSD to date. The boilers are currently unable to combust fish oil and will not be able to combust fish oil until UniSea can perform a rebuild of the fish oil fuel injection process. The EPA confirmed this information with ADEC.

Regulatory Basis

According to 40 CFR 63.11210(a) and (d), owners and operators of new units subject to emission limits must perform stack testing to demonstrate compliance within 180 days of startup. Further, according

to 40 CFR 63.1120(f): “For new or reconstructed boilers that combust only ultra-low-sulfur liquid fuel as defined in § 63.11237, you are not subject to the PM emission limit in Table 1 of this subpart providing you with monitor and record on a monthly basis the type of fuel combusted. If you intend to burn a fuel other than ultra-low-sulfur liquid fuel or gaseous fuels as defined in § 63.11237, you must conduct a performance test within 60 days of burning the new fuel.”

Determination

Based on a plain reading of the relevant provisions of NESHAP 6J, these boilers are not subject to an emission limit because they have, to date, only combusted ULSD, which is an exempted fuel under subpart 6J. Therefore, no testing is required at this time.

Once UniSea performs the necessary maintenance to combust fish oil in the boilers, there are three options to demonstrate compliance with the emission limit in NESHAP 6J:

1. UniSea may schedule a performance test within 60 days of burning the new fuel, as specified in 40 CFR 63.1120(f).
2. If it is not possible to schedule a performance test within 60 days because of circumstances beyond UniSea’s control, UniSea may notify the EPA Region 10 that a *force majeure* has occurred, as described in 40 CFR 63.7(a)(4). (Note: a *force majeure* is the only reason that the Administrator may approve a delayed source test under Part 63.)
3. If UniSea can demonstrate by other means that the units are in compliance with the relevant standard, then EPA Region 10 can waive the requirement for an initial performance test as allowed by 40 CFR 63.7(e)(2)(iv).

If you have any questions about this matter, please contact Mr. Geoffrey Glass at EPA Region 10 glass.geoffrey@epa.gov.

Sincerely,

**KARL
PEPPLE**

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Date: 2026.06.02
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Karl Pepple
Acting Branch Manager
Air Permits, Toxics, Transportation,
and Communities Branch
Air and Radiation Division

cc: Mr. Moses Coss
ADEC

Ms. Breanna Howard
ADEC