DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: **AQ0267MSS10** **Preliminary Date – September 15, 2021**
Rescinds Permit: AQ0267MSS06
Revises Permit: AQ0267CPT01

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0267MSS10 to the Permittee listed below.

Owners:

ConocoPhillips Alaska, Inc.
700 G Street (Zip 99501)
P.O. Box 100360
Anchorage, AK 9910-0360

ExxonMobil Alaska Production Inc.
3301 C Street, Suite 400 (Zip 99503)
P.O. Box 196601
Anchorage, AK 99519-6601

Chevron USA Inc.
P.O. Box 36366
Houston, TX 77236

Operator: **ConocoPhillips Alaska, Inc.**
P.O. Box 100360
Anchorage, AK 99510-0360

Stationary Source: **Central Production Facility #1**

Location: 70° 19’ 24” N; 149° 36’ 30” W

Project: H_2S Limit Increase

Permit Contact: Robin Glover, (907) 263-4874, robin.glover@conocophillips.com

The Permittee submitted an application for Minor Permit AQ0267MSS10 under 18 AAC 50.508(6) in order to revise or rescind the terms and conditions of a Title I permit. The project is also classified under 18 AAC 50.502(c)(3) for changes to an existing stationary source that will cause an emission increase greater than 10 tons per year (tpy) of sulfur dioxide (SO_2).

This permit satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this permit.

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James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

AAC ..... Alaska Administrative Code
ADEC ..... Alaska Department of Environmental Conservation
AOS ..... Air Online Services
AS ..... Alaska Statutes
ASTM ..... American Society for Testing and Materials
BACT ..... best available control technology
bhp ..... brake horsepower
CDX ..... Central Data Exchange
CEDRI ..... Compliance and Emissions Data Reporting Interface
C.F.R. ..... Code of Federal Regulations
CAA ..... Clean Air Act
CO ..... carbon monoxide
Department ..... Alaska Department of Environmental Conservation
dscf ..... dry standard cubic foot
EPA ..... US Environmental Protection Agency
EU ..... emissions unit
gr/dscf ..... grain per dry standard cubic foot (1 pound = 7000 grains)
gph ..... gallons per hour
HAPs ..... hazardous air pollutants [as defined in AS 46.14.990]
hp ..... horsepower
ID ..... emissions unit identification number
kPa ..... kiloPascals
LAER ..... lowest achievable emission rate
MACT ..... maximum achievable control technology [as defined in 40 C.F.R. 63]
MMBtu/hr ..... million British thermal units per hour
MMscf ..... million standard cubic feet
MR&R ..... monitoring, recordkeeping, and reporting
NESHAPs ..... National Emission Standards for Hazardous Air Pollutants [as contained in 40 C.F.R. 61 and 63]
NOx ..... nitrogen oxides
NRE ..... nonroad engine
NSPS ..... New Source Performance Standards [as contained in 40 C.F.R. 60]
O & M ..... operation and maintenance
O_2 ..... oxygen
PAL ..... plantwide applicability limitation
PM-10 ..... particulate matter less than or equal to a nominal 10 microns in diameter
PM-2.5 ..... particulate matter less than or equal to a nominal 2.5 microns in diameter
ppm ..... parts per million
ppmv, ppmvd ..... parts per million by volume on a dry basis
psia ..... pounds per square inch (absolute)
PSD ..... prevention of significant deterioration
PTE ..... potential to emit
SIC ..... Standard Industrial Classification
SIP ..... State Implementation Plan
SPC ..... Standard Permit Condition or Standard Operating Permit Condition
SO_2 ..... sulfur dioxide
The Act ..... Clean Air Act
TPH ..... tons per hour
tpy ..... tons per year
VOC ..... volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
VOL ..... volatile organic liquid [as defined in 40 C.F.R. 60.111b, Subpart Kb]
vol% ..... volume percent
wt% ..... weight percent
wt%S_{fuel} ..... weight percent of sulfur in fuel

Section 1 Permit Administration

1. Construction Permit 267CP01 remains in effect except as revised by Minor Permit AQ0267MSS10.

2. Minor Permit AQ0267MSS06 is rescinded by Minor Permit AQ0267MSS10.

Section 2 Emission Unit Inventory

Emissions Unit (EU) Authorization. The Permittee is authorized to install and operate the EUs listed in Table 1 in accordance with the minor permit application and the terms and conditions of this permit. The information in Table 1 is for identification purposes only, unless otherwise noted in the permit. The specific EU descriptions do not restrict the Permittee from replacing an EU identified in Table 1.

Table 1 – EU Inventory

EU #	EU Tag No.	Equipment Unit Description	Rating/Max Capacity	Installation Date
Group I – Gas Turbines				
1	C-2101-A	GE Frame 3 (MS3002K-HE) Gas Lift Compressor	16,260 hp ISO	5/2004
2	C-2101-B	GE Frame 3 (MS3002K-HE) Gas Lift Compressor	16,260 hp ISO	10/2003
3	C-2101-C	GE Frame 3 (MS3002K-HE) Gas Lift Compressor	16,260 hp ISO	11/2004
4	G-201-A	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	1979
5	G-201-B	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	1979
6	G-201-C	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	1979
7	G-201-D	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	1979
8	G-3201-E	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	10/1981
9	G-3201-F	EGT (Ruston) TB5000 Electric Generator (Dual fired)	4,900 hp ISO	10/1981
10	P-2202-A	EGT (Ruston) TB5400 Water Injection Pump	5,400 hp ISO	5/1993
11	P-2202-B	EGT (Ruston) TB5400 Water Injection Pump	5,400 hp ISO	5/1993
12	P-CL07-A	EGT (Ruston) TB5400 Water Injection Pump (Dual fired)	5,400 hp ISO	5/1993
13	P-CL07-B	EGT (Ruston) TB5400 Water Injection Pump (Dual fired)	5,400 hp ISO	5/1993
14	G-3203	GE Frame 6 (PG6561 B) Gas Turbine Electric Generator	53,500 hp (39,930 kW) ISO	1999
Group II – Gas-Fired Heaters (Excluding Drill Site Heaters)				
15	H-201	Broach Emergency Heater (Dual fired)	27.8 MMBtu/hr [heat input, LHV]	1979
16	G1-14-01	Born Crude Heater (KUTP)	44.4 MMBtu/hr [heat input, LHV]	12/1984

17	H-3204	Kvaerner Process Systems Fuel Gas Heater	9.7 MMBtu/hr [heat input, LHV]	1999
Group IV – Flares				
29	H-101B	McGill Emergency Flare	1.6 MMscf/day (Pilot/Purge/Assist) Combined Total for all flares	10/1981
30	H-KF01	Kaldair I-58-VS Emergency Flare/Control Device (LP)		1991
31	H-KF02	Kaldair I-87-FS Emergency Flare (HP)		1991
32	H-CR01A	McGill Emergency Flare		Unknown
33	H-CR01B	McGill Emergency Flare		1/1985
Group V – Incinerators				
35	H-250	Comptro Incinerator w/ supplemental gas-fired burners: Primary Burner #1 Primary Burner #2 Secondary Burner	1,300 lb/hr 0.8 MMBtu/hr 0.8 MMBtu/hr 2.0 MMBtu/hr	1980
Group VI – Other Equipment (Drill Site Heaters and Drill Site Production Heaters)				
37	H-1A01	Latoka Drill Site Heater (1A)	16.4 MMBtu/hr [heat input, LHV]	12/1981
38	H-1B01	Latoka Drill Site Heater (1B)	16.4 MMBtu/hr [heat input, LHV]	12/1981
39	H-2V01	CE NATCO Drill Site Heater (1C)	14.5 MMBtu/hr [heat input, LHV]	1984
40	H-3F01	CE NATCO Drill Site Heater (1D)	19.6 MMBtu/hr [heat input, LHV]	1985
42	H-1E02	GTS Energy Production Heater (1E)	30.0 MMBtu/hr [heat input, LHV]	8/15/05
43	H-1F01	BS & B Drill Site Heater (1F)	14.9 MMBtu/hr [heat input, LHV]	10/1982
44	H-1G01	BS & B Drill Site Heater (1G)	14.9 MMBtu/hr [heat input, LHV]	10/1982
45	H-1F-1901	Latoka Drill Site Heater (1H)	16.4 MMBtu/hr [heat input, LHV]	6/1982

46	H-1J01A	Petrochem Development Production Heater (1J)	36.8 MMBtu/hr [heat input, LHV]	12/1/04
47	H-1J01B	Petrochem Development Production Heater (1J)	36.8 MMBtu/hr [heat input, LHV]	12/1/04
48	H-1Q01	BS&B Drill Site Heater (1Q)	21.0 MMBtu/hr [heat input, LHV]	1985
49	H-1R01	BS&B Drill Site Heater (1R)	17.2 MMBtu/hr [heat input, LHV]	1985

Notes:

EUs 1 through 17, 29 through 33, 35 through 40, and 42 through 49 have already been installed at the stationary source.

3. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement EU, including any applicable minor or construction permit requirements.

Section 3 Fee Requirements

4. **Administration Fees.** The Permittee shall pay to the Department all assessed permit administration fees. Administration fee rates are set out in 18 AAC 50.400-403.

5. **Assessable Emissions.** For each period from July 1 through the following June 30, the Permittee shall pay to the Department an annual emission fee based on the stationary source's assessable emissions, as determined by the Department under 18 AAC 50.410. The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit in quantities 10 tons per year or greater. The quantity for which fees will be assessed is the lesser of the stationary source's:

   5.1 potential to emit of 4,767 TPY; or

   5.2 projected annual rate of emissions, in TPY, based upon actual annual emissions for the most recent calendar year, or another 12-month period approved in writing by the Department, when demonstrated by credible evidence of actual emissions, based upon the most representative information available from one or more of the following methods:

      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, including appropriate vendor-provided emissions factors when sufficient documentation is provided.

6. **Assessable Emission Estimates.** The Permittee shall comply as follows:

   6.1 No later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions as determined in Condition 5.2. Submit actual emissions estimates in accordance with the submission instructions on the Department's Standard Permit Conditions web page at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-i-submission-instructions/.

   6.2 The Permittee shall include with the assessable emissions report all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.

   6.3 If no estimate or waiver letter is submitted on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit in Condition 5.1.

Section 4 Ambient Air Quality Protection Requirements

7. **Fuel Limits**. To protect the 1-hour, 3-hour, 24-hour, and annual SO_2 AAAQS; and the 3-hour, 24-hour, and annual Class II maximum allowable increases (increments); the Permittee shall:

   7.1 Limit the hydrogen sulfide (H_2S) content of the fuel gas fired in EUs 1 through 17, 29 through 33, and 35 to no more than 300 ppmv at standard conditions on a consecutive 12-month average basis.

      a. Determine compliance no less than once a month with the fuel gas H_2S content limit as follows:

         (i) Determine the fuel gas H_2S content of the fuel using ASTM D 4810-88, ASTM D 4913-89, Gas Producer's Association method 2377-86.

         (ii) The fuel gas H_2S analysis required under this condition may be performed by the owner or operator, a service contractor retained by the owner or operator, or the fuel vendor.

      b. Keep records of the analysis conducted as required in Condition 7.1a(i).

      c. Report in each operating report required by the applicable operating permit issued to the stationary source under AS 46.14 and 18 AAC 50, the monthly fuel gas H_2S concentration, for each month of the reporting period.

      d. Report as excess emissions and permit deviation as described in the applicable operating permit issued to the stationary source under AS 46.14 and 18 AAC 50, should the fuel gas H_2S concentration exceed the limit in Condition 7.1, or if Conditions 7.1a through 7.1c are not met.

   7.2 Limit the hydrogen sulfide (H_2S) content of the fuel gas fired in EUs 37 through 49 to no more than 500 ppmv at standard conditions on a consecutive 12-month average basis.

      a. Determine compliance no less than once a month with the fuel gas H_2S content limit as follows:

         (i) Determine the fuel gas H_2S content of the fuel using ASTM D 4810-88, ASTM D 4913-89, Gas Producer's Association method 2377-86.

         (ii) The fuel gas H_2S analysis required under this condition may be performed by the owner or operator, a service contractor retained by the owner or operator, or the fuel vendor.

      b. Keep records of the analysis conducted as required in Condition7.2a(i).

      c. Report in each operating report required by the applicable operating permit issued to the stationary source under AS 46.14 and 18 AAC 50, the monthly fuel gas H_2S concentration, for each month of the reporting period.

d. Report as excess emissions and permit deviation as described in the applicable operating permit issued to the stationary source under AS 46.14 and 18 AAC 50, should the fuel gas H_2S concentration exceed the limit in Condition7.2, or if Conditions 7.2a through 7.2c are not met.

Section 5 Limits to Avoid Prevention of Significant Deterioration (PSD) Major Modification

8. Limit total nitrogen oxides (NOx) emissions from EUs 1 through 3 listed in Table 1 to no greater than 824 tons per 12 consecutive month period. Monitor, record and report NOx emissions, as described in the oeprating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50.

Section 6 Revisions to Previous Permit Actions

9. The SO_2 explanations and the H_2S limits and explanations for EUs 1 through 17, 29 through 33, 35 through 40, 43 through 45, 48, and 49, established in Exhibit B of Construction Permit 267CP01 are rescinded and replaced as follows:

Sources (Turbines): GE Frame 3 Turbines (C-2101-A, C-2101-B, and C-2101-C), EGT (Ruston) TB5000 Turbines (G-201-A, G-201-B, G-201-C, G-201-D, G-3201-E, and G-3201-F), and EGT (Ruston) TB5400 Turbines (P-2202-A, P-2202-B, P-CL07-A, and P-CL07-B)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	GE Frame 3	200 ppmv H_2S in fuel gas	300 ppmv H_2S in fuel gas (annual average)	Revised ambient demonstration submitted by CPAI on 5/3/2021.
	EGT (Ruston) TB5000 Series	200 ppmv H_2S in fuel gas		
	EGT (Ruston) TB5400 Series	200 ppmv H_2S in fuel gas	109 tpy total combined, except G-201-(A through D)	EPA PSD BACT and 10/7/97 permit revision.

Source (Turbine): GE Frame 6 Turbine (G-3203)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	G-3203	200 ppmv H_2S in fuel gas (24-hour average)	No Change.	Carried Forward. ADEC BACT limit.
			300 ppmv H_2S in fuel gas (annual average)	Revised ambient demonstration submitted by CPAI on 5/3/2021.

Sources (Heaters): Broach Dual-fired Heater (H-201); Born Crude Heater (G1-14-01); and Drill Site Heaters (H-1A01, H-1B01, H-2V01, H-3F01, H-1F01, H-1G01, H-1F-1901, H-1Q01, H-1Y01)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	Broach Heater	200 ppmv H_2S in fuel gas	300 ppmv H_2S in fuel gas (annual average)	Revised ambient demonstration submitted by CPAI on 5/3/2021.

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
	Born Heater	168 ppmv H_2S in fuel gas and 4.5 tpy	162 ppmv H_2S in Fuel gas (running 3-hr average) 300 ppmv H_2S in fuel gas (annual average)	The limit in 40 C.F.R. 60.104(a)(1) converts to 162 ppmv @ 59°F. Ton per year limit is now rolled into the group limit. Revised ambient demonstration submitted by CPAI on 5/3/2021.
	Drill Site Heaters	200 ppmv H_2S in fuel gas	500 ppmv H_2S in fuel gas (annual average)	Revised ambient demonstration submitted by CPAI on 5/3/2021.
			33 tpy (total for all units except H-201)	EPA PSD BACT and 10/7/97 permit revision

Sources (Heaters): Kvaerner Fuel Gas Heater (H-3204) and ICE Air Heater (H-102A)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	H-3204	200 ppmv H_2S in fuel gas (24-hour average)	No Change. 300 ppmv H_2S in fuel gas (annual average)	Carried Forward. ADEC BACT limit. Revised ambient demonstration submitted by CPAI on 5/3/2021.
	H-102A	0.5% sulfur content in liquid fuel	No change.	Carried forward.

Source: Incinerator (H-250)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	H-250	200 ppmv H_2S in fuel gas.	300 ppmv H_2S in fuel gas (annual average)	Carried Forward. Revised ambient demonstration submitted by CPAI on 5/3/2021.
		0.5% sulfur content in liquid fuel	No limit.	The incinerator supplemental burners do not use liquid fuel.

Sources (Flares): McGill Emergency Flares (H-101B, H-CR01A, and H-CR01B) and Kaldair Smokeless Emergency Flares (H-KF01, and H-KF02)

Pollutant	Source(s)	Limits in AQCP to Operate No. 9373-AA004	Revised Limits	Explanation
SO_2	H-101B, H-CR01A, H-CR01B, H-KF01, and H-KF02	200 ppmv H_2S in fuel gas	300 ppmv H_2S in fuel gas (annual average)	Revised ambient demonstration submitted by CPAI on 5/3/2021.

Section 7 SO_2 Emissions Monitoring, Recordkeeping, & Reporting

10. **Monitoring.** Beginning in Calendar year 2022 and ending in calendar year 2031, the Permittee shall monitor emissions from EUs 1 through 17, 29 through 33, 35 (gas-fired burners only), 37 through 40, and 42 through 49, and beginning in 2023 and ending in 2032, the Permittee shall calculate calendar year SO_2 emissions from the EUs as follows:

    10.1 Monitor and record the amount of fuel gas burned in million standard cubic feet (MMscf) during each calendar month of the calendar year by either:

        a. Using a fuel gas meter calibrated to manufacturer's specifications and accurate to within ± 5 percent; or

        b. Using an hour meter and assuming manufacturer's full load fuel consumption rate.

    10.2 Calculate and total SO_2 emissions for each calendar month of the calendar year using the amount of fuel gas recorded under Condition 10.1, the monthly H_2S content of the fuel gas measured as described in the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50, and the following equation:

$$SO_2(tons) = \frac{Fuel\ Gas\ (MMscf) * H_2S\ (ppmv) * 64\ \frac{lbs\ SO_2}{mol\ H_2S}}{379.4\ \frac{scf}{mol} * 2{,}000\ \frac{lbs}{ton}}$$

    10.3 By the reporting date specified for the operating report which encompasses the reporting for the month of December, required by the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 of each calendar year, calculate the total SO_2 emissions for the preceding calendar year by summing the total emissions calculated in Condition 10.2 for all 12 months of the preceding calendar year.

    10.4 By the reporting date specified for the operating report which encompasses the reporting for the month of December, required by the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 of each calendar year, determine the net change in SO_2 emissions for the preceding calendar year as follows:

$$Net\ Change\ in\ SO_2\ Emissions = (SO_2\ emissions\ calculated\ in\ Condition\ 10.3) - 106.9\ tpy$$

11. **Recordkeeping.** The Permittee shall maintain the following records for EUs 1 through 17, 29 thorugh 33, 35 (gas-fired burners only), 37 through 40, and 42 through 49 and make them available to the Department upon request.

    11.1 The fuel gas consumed (MMscf) for each calendar month of the calendar year;

    11.2 The weighted average fuel gas H_2S concentration (ppmv) data for each calendar month of the calendar year;

11.3 The total SO_2 emissions for each calendar month calculated under Condition 10.2 and supporting calculations used to obtain the emission estimates;

11.4 The total SO_2 emissions for each calendar year calculated under Condition 10.3 and the supporting calculations to obtain the emission estimates; and

11.5 The net change in SO_2 emissions for each calendar eyar calcualted under Condition 10.4.

12. **Reporting.** For Eus 1 through 17, 29 through 33, 35 (gas-fired burners only), 37 through 40, 42 through 49, the Permittee shall report as follows:

12.1 For calendar years 2022 through 2031, report in the operating report required by the oeprating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 the following information:

a. SO_2 emissions for each calendar month of the calendar year calculated under Condition 10.2; and

b. In the final oeprating report for the calendar year, report the net change in emissions calculated under Condition 10.4 for the calendar year ending with the last month of the reporting period.

12.2 Within 60 days after the end of each calendar year 2022 through 2031, report the following information to the Department if the net change in SO_2 emissions calculated under Condition 10.4 for the preceding year reaches or exceeds 40 tpy[1]:

a. The name, address and telephone number of the major stationary source;

b. The annual emissions calculated under Condition 10.3 and the net change in emissions calculated under Condition 10.4; and

c. Any other informatin that the Permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

12.3 Report as a permit deviation as described in the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 if monitoring, recordkeeping, or reporting under Conditions 10, 11, or 12 is not completed as required.

[1] ConocoPhillips Alaska, Inc. is required to submit a PSD permit application if the net change in emissions calculated under Condition 10.4 for the preceding year reaches or exceeds 40 tpy.

Section 8 Recordkeeping, Reporting, and Certification Requirements

13. **Certification.** The Permittee shall certify any permit application, report, affirmation, or compliance certification 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.

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

        a. uses a security procedure, as defined in AS 09.80.190, that the Department has approved; and

        b. accepts or agrees to be bound by an electronic record executed or adopted with that signature.

14. **Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall submit to the Department one certified copy of reports, compliance certifications, and/or other submittals required by this permit. The Permittee may submit the documents electronically or by hard copy.

    14.1 Submit the certified copy of reports, compliance certifications, and/or other submittals in accordance with the submission instructions on the Department's Standard Permit Conditions web page at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/.

Section 9 Standard Permit Conditions

15. 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

    15.1 an enforcement action; or

    15.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.

16. 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.

17. 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.

18. 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.

19. The permit does not convey any property rights of any sort, nor any exclusive privilege.

20. 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

    20.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;

    20.2 have access to and copy any records required by this permit;

    20.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and

    20.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 10 Permit Documentation

Date	Document Details
Month DD, 20YY	Application Received
Month DD, 20YY	Response received from Permittee / Applicant regarding additional application information.