

**Alaska Department of Environmental Conservation
Air Permits Program**

**Public Comment Draft - November 9, 2009
Union Oil Company of California
Monopod Platform**

**STATEMENT OF BASIS
of the terms and conditions for
Permit No. AQ0067TVP02**

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INTRODUCTION

This document sets forth the statement of basis for the terms and conditions of Operating Permit No. AQ0067TVP02.

STATIONARY SOURCE IDENTIFICATION

Section 1 of Operating Permit No. AQ0067TVP02 contains information on the stationary source (Monopod Platform) as provided in the Title V permit application.

The stationary source (Monopod Platform) is owned and operated by Union Oil Company of California, and Union Oil Company of California is the Permittee for the stationary source's operating permit. The SIC code for this stationary source is 1311 - Crude Oil and Natural Gas. The stationary source is an offshore oil and gas production platform that consists of equipment for handling the production of both natural gas and oil from wells and transportation of the produced streams to the Trading Bay Production Facility.

EMISSION UNIT INVENTORY AND DESCRIPTION

Under 18 AAC 50.326(a), the Department requires operating permit applications to include identification of all emissions-related information, as described under 40 CFR 71.5(c)(3).

The emission units at the Monopod Platform that are classified and have specific monitoring, recordkeeping, and reporting requirements are listed in Table A of Operating Permit No. AQ0067TVP02. Table A contains information on the emission units regulated by this permit as provided in the application. The table is provided for informational and identification purposes only. Specifically, the source rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

A summary of the potential to emit (PTE)¹ and assessable PTE as indicated in the application from the Monopod Platform is shown in the table below.

Table C - Emissions Summary, in Tons Per Year (TPY)

Pollutant	NO _x	CO	PM-10	SO ₂	VOC	HAPs	Total
PTE	819	176	19.3	74.9	26.7	15.7*	1,219
Assessable PTE	819	176	19	75	27	0*	1,219

* All HAPs are also VOCs and are not counted towards Total Assessable PTE.

¹ *Potential to Emit or PTE means the maximum capacity of a stationary source to emit a pollutant under its physical or operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation or the effect it would have on emissions is federally enforceable. Secondary emissions do not count in determining the potential to emit of a stationary source, as defined in AS 46.14.990(23), effective 12/3/05.*

The assessable PTE listed under Condition 27.1 is the sum of the emissions of each individual regulated air pollutant for which the stationary source has the potential to emit quantities greater than 10 TPY. The emissions listed in Table A are estimates that are for informational use only. The listing of the emissions does not create an enforceable limit to the stationary source.

For criteria pollutants, emissions are as provided in the application, as follows: the potential SO₂ emissions from the gas-fired turbines, engines, flares, boilers, and heaters are calculated using engineering calculations and the maximum allowable sulfur content (200 ppmv H₂S) of the natural gas available for combustion. Data submitted by the applicant shows that actual H₂S levels have been approximately one third of that value in practice. AP 42 emission factors, source tests, and 0.5% sulfur for diesel fuel are used for calculating emissions of criteria pollutants. AP 42 emission factors are used for calculating emissions of HAPs from gas-fired turbines, engines, flares, boilers, and heaters. GLY-Calc was used to calculate HAP emissions from the glycol regeneration unit assuming the unit HAP emissions are controlled through a condenser with an outlet temperature of 120 degrees Fahrenheit. The Department verified the emission calculations submitted by UOCC in their application.

BASIS FOR REQUIRING AN OPERATING PERMIT

In accordance with AS 46.14.130(b), an owner or operator of a Title V source² must obtain a Title V permit consistent with 40 C.F.R. Part 71, as adopted by reference in 18 AAC 50.040.

Except for sources exempted or deferred by AS 46.14.120(e) or (f), AS 46.14.130(b) lists three categories of sources that require an operating permit:

- (1) A major source;
- (2) A stationary source including an area source subject to federal new source performance standards under Section 111 of the Clean Air Act or national emission standards under Section 112 of the Clean Air Act;
- (3) Another stationary source designated by the federal administrator by regulation.

This stationary source requires an operating permit because it is classified under 18 AAC 50.326(a) and 40 C.F.R. 71.3(a) as

- a) Directly emitting, or has the potential to emit, 100 tpy or more of any air pollutant.

AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

There are no previous air quality permits-to-operate issued to this source.

Title I (Construction and Minor) Permits

The Department issued Construction Permit No. 0067CP01 to this stationary source on June 20, 2003. The Permittee did not add any new emission units under this permit. Rather, the permit added fuel consumption limits and fuel sulfur content limits for two existing crane engines (EU IDs 13 and 14 - East Crane and West Crane) that were constructed in 1996 and 1997,

² "Title V source" means a stationary source classified as needing a permit under AS 14.130(b) [ref. 18 AAC 50.990(111)].

respectively. The limits were added to the operating permit to limit emissions for these engines to less than the PSD major modification thresholds of 40 tons per year for NO_x and 40 tons per year for SO₂. These engines were constructed in 1996 and 1997 in one project termed the Monopod Platform Crane Engines Project. Although the increase in potential to emit due to this project is greater than the PSD major modification thresholds for NO_x, this project did not trigger PSD major modification requirements because the actual emissions from these two engines never exceeded the PSD major modification thresholds for any regulated pollutant. The Department established stationary source-specific requirements in this Title I permit included in the new operating permit as described in Table D.

Title V Operating Permit Application, Revisions and Renewal History

The Department issued Operating Permit No. AQ0067TVP01 effective on December 2, 2002 to Union Oil Company of California to operate the Monopod Platform. The Union Oil Company of California was issued Revision 1 to Operating Permit No. AQ0067TVP01 on June 20, 2003. This revision incorporated the changes from construction permit 067CP01 into the source's current operating permit.

The Union Oil Company of California submitted an operating permit renewal application on June 19, 2007. UOCC submitted additional information on November 7, 2008.

COMPLIANCE HISTORY

The stationary source has operated at its current location since 1966. Review of the permit files for this stationary source, which includes the past inspection reports and compliance evaluations indicate a stationary source generally operating in compliance with its operating permit.

APPLICABLE REQUIREMENTS FROM PRE-CONSTRUCTION PERMITS

Incorporated by reference at 18 AAC 50.326(j), 40 C.F.R. Part 71.6 defines "applicable requirement" to include the terms and conditions of any pre-construction permit issued under rules approved in Alaska's State Implementation plan.

Alaska's State Implementation Plan included the following types of pre-construction permits:

- Permit-to-operate issued before January 18, 1997 (these permits cover both construction and operations);
- Construction Permits issued after January 17, 1997; and
- Minor permits issued after October 1, 2004.

Pre-construction permit terms and conditions include both source-specific conditions and conditions derived from regulatory applicable requirements such as standard conditions, generally applicable conditions and conditions that quote or paraphrase requirements in regulation.

These requirements include, but not limited to, each source-specific requirement established in these permits issued under 18 AAC 50 that are still in effect at the time of this operating permit issuance. Table D below lists the requirements carried over from Operating Permit No. AQ0067TVP01 and Construction Permit No. 0067CP01 into Operating Permit No. AQ0067TVP02 to ensure compliance with the applicable requirements.

Table D - Comparison of Operating Permit No. AQ0067TVP01 Conditions to Operating Permit No. AQ0067TVP02 Conditions³

Permit No. AQ0067TVP01 Condition number	Description of Requirement	Permit No. AQ0067TVP02 Condition Number	How condition was revised
Condition 13	EPA approved fuel nitrogen monitoring waiver for EU IDs 1 and 2	None	The Permittee requested that this condition be removed. Nitrogen monitoring under 40 CFR 60.334(h)(2) is not required because Union Oil Company of California has chosen not to claim an allowance for fuel bound nitrogen. Therefore, the EPA waiver is no longer required.
Condition 17	Recordkeeping Requirement for applicability of 40 CFR 63, Subpart HH	None	This condition required that the Permittee keep records to verify that the source was not subject to the requirements of 40 CFR 63, Subpart HH. This requirement is no longer needed to show that the source is not subject to 40 CFR 63 Subpart HH.
Condition 27	Condition prohibiting the burning of used oil in any emission unit at this stationary source.	None	18 AAC 50.335(g) was repealed on October 1, 2004.
None	NOx and SO ₂ PSD Significant Modification Avoidance requirements for Emission Units 13 and 14	Conditions 10 and 11	The conditions making the permit modifications performed under construction permit 067CP01 and Revision 1 AQ0067TVP01 minor for PSD are incorporated into the Title V renewal permit.
Table 2	Permit Shield for units subject to 40 CFR 60, Subpart GG	Table B EU IDs 1 and 2	The Permittee has requested that a permit shield be added for EU IDs 1 and 2 for 40 CFR 60.334(a) and (b). These requirements apply only to turbines using water injection for NOx control. Turbines 1 and 2 do not use water injection for NOx control.
Table 2	Permit Shield for units subject to 40 CFR 60, Subpart GG	Table B, EU IDs 1 and 2	The Permittee has requested that a permit shield be added for EU IDs 1 and 2 for 40 CFR 60.334(c) - (g). These requirements specify optional monitoring methods that Union Oil Company of California chooses not to conduct.

³ This table does not include all standard and general conditions.

Permit No. AQ0067TVP01 Condition number	Description of Requirement	Permit No. AQ0067TVP02 Condition Number	How condition was revised
Conditions 14.1, 14.2, and 14.3	EPA custom fuel sulfur monitoring conditions	Condition 22	These conditions were carried forward into the operating permit renewal.
Table 2	Permit Shield for units subject to 40 CFR 60, Subpart GG	Table B, EU IDs 1 and 2	The Permittee has requested that a permit shield be added for EU IDs 1 and 2 for 40 CFR 60.334(h)(2). This paragraph requires Permittees who claim an allowance for fuel bound nitrogen to monitor the nitrogen content of the fuel combusted in the turbines. Union Oil Company of California has chosen not to claim an allowance for fuel bound nitrogen.
Table 2	Permit Shield for 40 CFR 60, Subpart KKKK New Source Performance Standards for Stationary Combustion Turbines	None	These turbines were constructed before February 18, 2005 and have not been reconstructed since that time. However, if these turbines are constructed, reconstructed, or modified during the term of this permit, they may become subject to the requirements of Subpart KKKK. Therefore, the Permit Shield is not renewed.
Table 2	Permit Shield for 40 CFR 60, Subpart IIII New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines	None	These engines were constructed prior to July 11, 2005 and have not been reconstructed since that time. However, if these engines are constructed, reconstructed, or modified during the term of this permit, they may become subject to the requirements of Subpart IIII. Therefore, the Permit Shield is not renewed.

STATEMENT OF BASIS FOR THE PERMIT CONDITIONS

The state and federal regulations for each condition are cited in Operating Permit No. AQ0067TVP02. The Statement of Basis provides the legal and factual basis for each term and condition as set forth in 40 C.F.R. 71.6(a)(1)(i).

Conditions 1 and 2 - 4, and 5. Visible Emissions Standard and MR&R

Legal Basis: These conditions ensure compliance with the applicable requirements in 18 AAC 50.055(a).

- 18 AAC 50.055(a) applies to the operation of fuel-burning equipment and industrial processes. EU IDs 1 - 20 are fuel burning equipment or industrial processes.

Factual Basis: Condition 1 requires the Permittee to comply with the visible emission standard applicable to fuel-burning equipment. The Permittee shall not cause or allow the equipment to violate this standard.

The Permittee must monitor, record-keep and report emissions in accordance with Conditions 2 through 5 of the permit.

Conditions 2 - 4 MR&R conditions are standard conditions adopted into regulation pursuant to AS 46.14.010(e) effective November 9, 2008.

For any unit that is classified as insignificant under 18 AAC 50.326(e), the Permittee shall meet the requirements under Condition 12.

As requested by the Permittee, the following changes were made to the standard permit term during this review:

- Language was added to Condition 2.1d for units that do not operate on a consistent basis to indicate that the annual method 9 observations must be taken between 10 and 13 months after the previous observations **or during the next month the unit operates, whichever is later**. Also Condition 2.1d was revised to indicate that for units that operate intermittently the Permittee is required to perform 18-minute observations annually and Conditions 2.1a - 2.1c do not apply.
- Condition 3.1a(ii) was revised to add "if known" as follows:
 - *"...the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate, **if known**) on the sheet at the time opacity observations are initiated and completed;"*
 - The qualifier "if known" was added to Condition 3.1a(ii) because the Permittee is not required to install fuel or load meters specifically to comply with this condition. However, the Permittee is required to record the **exact** operating rate (fuel or load consumption rate) on the data sheet, at the time opacity observation is initiated and completed, if this information is available for an individual unit from a fuel or load meter (or other means). As such, for a unit subject to this requirement that does not have an individual fuel or load meter the Permittee shall estimate the operating rate and record it on the data sheet at the time opacity observation is initiated and completed.

The standard operating condition for some equipment (e.g., fire water pumps and cranes) is not steady state and therefore likely to be variable during the observation. For such equipment, the Permittee may refer to the estimated load recorded under Condition 3.1a(ii) as "online" or "idle".

Beyond as noted above, the Department has previously determined that the standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate the unit-specific or stationary-source-specific conditions would better meet the requirements. Therefore, the Department concludes that the standard conditions meet the requirements of 40 C.F.R. 71.6(a)(3).

The Department developed Condition 5 to provide a standardized version of flare monitoring that is not dependent upon the type or design of upstream equipment. It has been claimed that gas-fired flares normally burn without emitting visible emissions, but actual field data demonstrating this assumption is not available. However, gas-fired flares have been shown to smoke when a control device, i.e. a knockout drum, flare scrubber, gas or steam assist, or vapor recovery system malfunctions. Thus, the condition sets out a protocol to collect actual field data to determine compliance with the 20 percent opacity standard for flares.

A Department analysis of industry flaring operations indicates that 49 percent of the gas flared (by volume) is for pilot/purge, 25 percent is for flaring less than one hour, and 26 percent is for flaring that lasts more than one hour. Pilot/purge flaring constitutes half of all flaring by volume and is continuous in nature and can be observed at any time. This type of flaring has not caused violations of the opacity standard in the past and can be checked at any time by agency inspectors. The remaining half of the flaring volume is split evenly between less than and greater than one-hour duration. Therefore, the monitoring scheme in this condition addresses the half of the non-continuous flaring operations that are scheduled and for which a certified observer can reasonably be located onsite.

Since it is impractical to require a stationary source to have a certified Method-9 opacity reader on site for unpredictable emergency flaring, the monitoring protocol requires Method-9 readings only during scheduled flare events. Scheduled events such as those generated by maintenance activities and well testing of greater than one-hour in duration will be observed. These one-hour events are currently quantified and reported to the Alaska Oil and Gas Conservation Commission for other reasons and thus provides a confirming information record of the occurrence of these events. Only those events as defined in the condition need to be monitored. The Department requires a flare event each 12-months to be monitored in order to monitor flare performance during the life of the permit, not to have all flare events grouped within a short time-frame which does not indicate sustained performance of the control device.

Since only flaring that is scheduled and exceeds one hour is required to be observed, operators will have time to provide certified Method-9 readers onsite. Most oil and gas production plants in Alaska are located at remote sites, so it is not reasonable to self-monitor all or even a large sample of the flaring that occurs. Data collected from planned events will help the Department refine this monitoring scheme during future permit cycles. Process upsets and emergency events that may or may not exceed one hour occur randomly and do not lend themselves easily to periodic monitoring. At this time, the Department will rely on

stationary source excess emission reports, citizen complaints, and agency inspections for information concerning these short term and emergency events.

Gas-Fired Fuel Burning equipment:

Monitoring – The monitoring of gas-fired sources for visible emissions is waived, i.e. no source testing will be required. The Department has found that natural gas-fired equipment inherently has negligible PM emissions. However, the Department can request a source test for PM emissions from any smoking equipment.

Reporting – As provided for in Condition 1, the Permittee must annually certify that only gaseous fuels are used in the equipment.

Liquid Fired Fuel Burning Equipment:

Monitoring – The visible emissions may be observed by either Method-9 or the Smoke/No Smoke plans as detailed in condition 2. Corrective actions such as maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

Recordkeeping - The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

Reporting - The Permittee is required to report: 1) emissions in excess of the federal and the state visible emissions standard and 2) deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the stationary source operating report.

Flares:

Monitoring for flares (EU IDs 17 - 20) requires Method-9 observations of scheduled flaring events lasting greater than one hour at least once every twelve months such an event occurs. The Permittee must report the results of these observations to the Department.

TEG Dehydration Unit:

EU ID 16 (TEG Dehydration Unit) has a still column vent that exhausts to the atmosphere. The vapors emitted are composed of water and very small levels of VOCs, and are not expected to be a significant source of opacity (the opacity standard specifically exempts water vapor). Therefore, there are no MR&R requirements for EU ID 16.

Conditions 6 and 7 - 8, Particulate Matter (PM) Standard

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.055(b). These requirements apply to operation of all industrial processes and fuel burning equipment in Alaska.

- EU IDs 1 - 20 are fuel-burning equipment or industrial processes.

These PM standards also apply because they are contained in the federally approved SIP effective September 13, 2007.

Factual Basis: Condition 6 prohibits emissions in excess of the state PM (also called grain loading) standard applicable to fuel-burning equipment and industrial processes. The

Permittee shall not cause or allow fuel-burning equipment or industrial processes to violate this standard.

MR&R requirements are listed in Conditions 7 - 8 of the permit.

The Permittee must establish by actual visual observations which can be supplemented by other means, such as a defined Operation and Maintenance Program, that the emission unit is in continuous compliance with the State's emission standards for particulate matter.

For liquid fuel units the MR&R conditions are Standard Condition IX adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3).

Gas Fired:

For gas fired emission units, MR&R conditions are Standard Condition VIII adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3).

Although periodic PM monitoring of gas-fired units is waived, the Department has the discretion to request a source test for PM emissions from any fuel burning equipment under 18 AAC 50.220(a) and 345(l).

Liquid Fired:

For liquid fuel units the MR&R conditions are Standard Condition IX adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3).

Flares:

PM Monitoring of gas-fired flares for particulate matter is waived, i.e. no source testing will be required, because of the difficulty and questionable results these tests produce when applied to flares. The Department has recognized this fact by incorporating the waiver in the State Air Quality Control Plan as adopted in November 1984. This plan was approved as part of the September 13, 2007 State Implementation Plan approval but not incorporated by reference. No recordkeeping or reporting is required.

TEG Dehydration Unit:

EU ID 16 (TEG Dehydration Unit) has a still column vent that exhausts to the atmosphere. The vapors emitted are composed of water and VOC, and are not expected to be a significant source of particulate matter. Therefore, there are no MR&R requirements for EU ID 16.

Condition 9, Sulfur Compound Emissions

Legal Basis: This condition requires the Permittee to comply with the sulfur compound emission standard for all fuel-burning equipment or industrial processes in the State of Alaska.

- EU IDs 1 - 20 are fuel-burning equipment and industrial processes.

These sulfur compound standards also apply because they are contained in the federally approved SIP effective September 13, 2007.

Factual Basis: The condition requires the Permittee to comply with the sulfur compound emission standard applicable to fuel-burning equipment. The Permittee may not cause or allow the affected equipment to violate this standard.

Sulfur dioxide comes from the oxidation of sulfur in the fuel (e.g. coal, natural gas, fuel oils).

Liquid Fuels: For oil fired fuel-burning equipment the MR&R conditions are Standard Condition XI and XII adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 C.F.R. 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 C.F.R. 71.6(a)(3).

Gaseous Fuels: Fuel gas sulfur is measured as hydrogen sulfide (H_2S) concentration in ppm by volume (ppmv). Calculations⁴ show that fuel gas containing no more than 4000 ppm H_2S will comply with this emission standard at stoichiometric or excess air combustion conditions. This is true for all fuel gases. The unit-specific fuel sulfur content limits of Condition 11 to avoid PSD for sulfur dioxide also have been referenced in order to streamline the permit.

Equations to calculate the exhaust gas SO_2 concentrations resulting from the combustion of fuel gas were not included in this permit. Fuel gas with an H_2S concentration of even 15 percent of 4000 ppm is currently not available in Alaska and is not projected to be available during the life of this permit. The Permittee is required to record the fuel gas H_2S and total sulfur concentration of the fuel gas. The Permittee is required to report as State excess emissions whenever the fuel combusted causes sulfur compound emissions to exceed the standards in this condition. The Permittee is required to include copies of the records mentioned in the previous paragraph with the stationary source operating report.

Note: During this review, the requirement for the Permittee to analyze a representative sample of fuel **semiannually** for EU ID(s) 1-10 and 15 (fuel gas) to determine the fuel sulfur content was changed to an **annual** monitoring frequency because the Permittee provided the results of the fuel sulfur content analyses and the fuel content readings were shown to be well below that represented by limits in Condition 9. For 2007 and 2008 operating reports, UOCC maximum fuel gas H_2S was 140 ppmv. Additionally, the stationary source does not receive gas from a supplier, therefore, the language will never be triggered and has been removed from the permit as requested by the Permittee.

⁴ See ADEC Air Permits Web Site at <http://www.dec.state.ak.us/air/ap/docs/sulfgas.pdf>, under "Stoichiometric Mass Balance Calculations of Exhaust Gas SO_2 Concentration."

During this review, for EU IDs 13 and 14 (fuel oil) the requirement to calculate SO₂ emissions in ppm (according to a material balance calculation worksheet) if a load of fuel contains more than 0.75% by weight was removed from the permit because these units are subject to more stringent fuel sulfur content limits in Condition 11. Therefore, these units are prohibited from burning fuel oil that would trigger this requirement.

During this review, the acceptable methods for analyzing a representative fuel sample for fuel gas units, to determine the sulfur content including using a 40 C.F.R. Part 60, Appendix A Reference Method, an ASTM D4810 test method or alternative method approved by the Department, were revised to specify test methods as under the Department's 2006 Operating Permit audit action plan, the Department agreed not to include terms such as "or Department approved alternative" in permit monitoring terms.

TEG Dehydration Unit:

EU ID 16 (TEG Dehydration Unit) has a still column vent that exhausts to the atmosphere. The vapors emitted are composed of water and VOC, and are not expected to be a significant source of sulfur compounds as Glycol has a low affinity for hydrogen sulfide. Therefore, there are no sulfur compound MR&R requirements for EU ID 16.

Conditions 10 and 11, Construction Permit Requirements

Legal Basis: The Permittee is required to comply with all effective stationary source-specific requirements that were carried forward from previous EPA PSD permits, SIP approved permits to operate issued before January 18, 1997, SIP approved construction permit(s), SIP approved minor permits, operating permits issued between January 18, 1997 and September 30, 2004, or owner requested limits established under 18 AAC 50.225. These requirements include Best Available Control Technology limits, limits to ensure compliance with the attainment or maintenance of ambient air quality standards or maximum allowable ambient concentrations, and owner requested limits. State pre-construction requirements apply because they were originally developed through case-by-case action under a federally approved SIP or approved Operating Permit program. EPA approved the latest SIP effective September 13, 2007.

Factual Basis: Union Oil Company of California replaced the Monopod Platform's East Crane and West Crane engines with more powerful units that were capable of greater emissions. Because the project resulted in an emission increase, it required a construction permit. The construction permit capped fuel consumption on the crane engines to ensure that the platform's potential emissions increase does not exceed the PSD thresholds. Additionally, the permit also placed a fuel sulfur restriction on the crane engines to ensure that the modeled impacts would be less than the applicable significant impact levels. These restrictions are incorporated in the Title V permit.

Condition 10, Fuel Consumption Cap: EU IDs 13 and 14

Legal Basis: This requirement is carried forward from permit 067CP01, issued on June 20, 2003 and Revision 1 to Operating Permit AQ0067TVP01, issued on June 20, 2003.

Factual Basis: This condition requires the Permittee to comply with fuel usage limits for EU IDs 13 and 14. At the time of construction of EU IDs 13 and 14 in 1996 and 1997 (Monopod Platform Crane Engines Project), this source was classified as a Prevention of

Significant Deterioration (PSD) Major Source under 18 AAC 50.300(c)(1), as the stationary source had a potential to emit more than 250 tons per year of NO_x and CO. The owner requested limits on fuel consumption by the crane engines to limit potential emissions in order to avoid classification of this modification as a PSD significant modification under 18 AAC 50.300(h)(3), as provided by 18 AAC 50.305(a)(4). Construction permit 067CP01 contained terms and conditions to ensure that allowable emissions from the Monopod Platform Crane Engines Project will not cause an ambient concentration that exceeds the concentrations established in Table 6 of 18 AAC 50.310(d)(2) at any location that does not or would not meet the ambient air quality standard or maximum allowable ambient concentration.

Condition 11, Diesel Fuel Sulfur Content - EU IDs 13 and 14

Legal Basis: This requirement is carried forward from permit 067CP01, issued on June 20, 2003 and Revision 1 to Operating Permit AQ0067TVP01, issued on June 20, 2003.

Factual Basis: This condition requires the Permittee to comply with fuel sulfur content limits for EU IDs 13 and 14. At the time of construction of EU IDs 13 and 14 in 1996 and 1997 (Monopod Platform Crane Engines Project), UOCC requested the fuel sulfur restriction on the crane engines to ensure that the modeled impacts would be less than the applicable significant impact levels. Projects that are below the applicable significant impact thresholds do not require a cumulative ambient impact assessment. Construction permit 067CP01 contained terms and conditions to ensure that allowable emissions from the Monopod Platform Crane Engines Project would not cause an ambient concentration that exceeds the concentrations established in Table 6 of 18 AAC 50.310(d)(2) at any location that does not or would not meet the ambient air quality standard or maximum allowable ambient concentration. Note these Title I regulations cited above have changed since the Construction Permit was issued.

Condition 12, Insignificant Emission Units

Legal Basis: The Permittee is required to meet state emission standards set out in 18 AAC 50.055 for all industrial processes fuel-burning equipment, and incinerators regardless of size.

Factual Basis: The condition re-iterates the emission standards and require compliance for insignificant emission units. The Permittee may not cause or allow their equipment to violate these standards. Insignificant emission units are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance.

The Department finds that the insignificant units at this stationary source do not require specific monitoring, recordkeeping and reporting to ensure compliance under these conditions.

Condition 12.4a requires certification that the sources did not exceed state emission standards during the previous year and did not emit any prohibited air pollution.

These conditions were rearranged from the text of Standard Permit Condition V adopted January 26, 2004 to better suit the intent and to add clarity.

Conditions 13 – 20, NSPS Subpart A Requirements

Legal Basis The Permittee must comply with those New Source Performance Standard (NSPS) provisions incorporated by reference the NSPS effective July 1, 2007, for specific industrial activities, as listed in 18 AAC 50.040⁵.

Most (with the exception of some storage tanks) affected facilities subject to an NSPS are subject to Subpart A. At this stationary source, EU IDs 1 and 2 are subject to NSPS Subpart GG and therefore subject to Subpart A.

Condition 13.1 - The Permittee has already complied with the notification requirements in 40 C.F.R. 60.7 (a)(1) - (4) for EU IDs 1 and 2. However, the Permittee is still subject to these requirements in the event of a new NSPS affected facility or in the event of a modification or reconstruction of an existing facility into an affected facility.

Condition 13.2 - The requirements to notify the EPA and the Department of any proposed replacement of an affected facility (40 C.F.R. 60.15) applies to EU IDs 1 and 2 in the event of a proposed replacement of these affected facilities.

Condition 14 - Start-up, shutdown, or malfunction record maintenance requirements in 40 C.F.R. 60.7(b) are applicable to all NSPS affected facilities subject to Subpart A.

Recordkeeping requirements in 40 C.F.R. 60.7(f) are applicable to all NSPS affected facilities. (Satisfied by Condition 50)

Conditions 15 and 16 - NSPS excess emission reporting requirements and summary report form in 40 C.F.R. 60.7(c) & (d) are applicable to EU ID(s) 1 - 2.

Recordkeeping requirements in 40 C.F.R. 60.7(f) are applicable to all NSPS affected facilities. (Satisfied by Condition 50)

Condition 17 - The Permittee has already complied with the initial performance test requirements in 40 C.F.R. 60.8 for EU ID(s) 1 - 2. However, the Permittee is still subject to these requirements in the event of a new NSPS affected facility, in the event of a modification or reconstruction of an existing facility into an affected facility or at such other times as may be required by EPA.

Condition 18 - Good air pollution control practices in 40 C.F.R. 60.11 are applicable to all NSPS affected facilities subject to Subpart A (EU IDs 1 and 2).

Condition 19 - states that any credible evidence may be used to demonstrate compliance or establishing violations of relevant NSPS standards for EU IDs 1 and 2.

Condition 20 - Concealment of emissions prohibitions in 40 C.F. R. 60.12 are applicable to EU IDs 1 and 2.

The Flare is not subject to 40 C.F. R. 60.18 because it is a safety device and not a control device. It does not receive any tank vapors from any NSPS regulated sources.

Factual Basis: Subpart A contains the general requirements applicable to all affected facilities (sources) subject to NSPS. In general, the intent of NSPS is to provide technology-based emission control standards for new, modified and reconstructed affected facilities.

⁵ EPA has not delegated to the Department the authority to administer the NSPS program as of the issue date of this permit.

Conditions 21 - 22, NSPS Subpart GG Requirements

Legal Basis: These conditions prohibit the Permittee from exceeding emission standards set out in Subpart GG. NSPS Subpart GG applies to stationary gas turbines with a heat input at peak load (maximum load at 60 percent relative humidity, 59 degrees F, and 14.7 psi) equal to or greater than 10.7 gigajoules per hour (10 MMBtu/hr), based on the lower heating value of the fuel fired and constructed, modified, or reconstructed after October 3, 1977.

Factual Basis: These conditions incorporate NSPS Subpart GG NO_x emission and sulfur compound limits. The Permittee may not allow equipment to violate these standards.

NO_x Standard: For a turbine subject to 40 C.F.R. 60.332, the NO_x standard is determined by the following equation:

$$STD_{NOX} = 0.015(14.4 / Y) + F$$

where,

STD_{NOX} = allowable NO_x emissions (percent by volume at 15 percent oxygen and on a dry basis)

Y = manufacturer's maximum rated heat input (kJ/W-hr), or actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the affected stationary source. The value of Y shall not exceed 14.4 kJ/W-hr

F = NO_x emissions allowance for fuel bound nitrogen, percent by volume, **assumed to be zero for distillate fuel oil and gaseous fuels.**

Based on the manufacturer's heat rating at manufacturer's rated peak load, and assuming fuel bound nitrogen of zero, the NO_x standard is 176 ppmv for EU IDs 1 and 2.

SO₂ Standard: The Permittee has chosen to comply with the SO₂ standard by limiting the sulfur content of the fuel burned in EU IDs 1-10 and 15 to not exceed 0.8 percent by weight in accordance with 40 C.F.R. 60.333(b), and to demonstrate compliance with this limit by monitoring the sulfur content of the fuel oil.

Condition 21, NO_x Monitoring, Recordkeeping, and Reporting

Legal Basis: Periodic monitoring is included in Condition 21.2 for all turbines that normally operate for greater than 400 hours in a 12 month period. This additional monitoring is necessary to ensure that turbine emissions comply with the NSPS NO_x standard and is required under 40 CFR 71.6(a)(3) as the subpart does not contain MR&R sufficient for an operating permit.

Factual Basis: The Department does not have enough information to make categorical determinations that certain types of turbines, or turbines with emission test results below a certain percentage of the Subpart GG NO_x emission limit will inherently comply with the Subpart GG limit at all times and will never need additional testing. After a sufficient body of NO_x data is gathered under monitoring conditions for compliance with 40 C.F.R. 60, Subpart GG, the Department may find that it has enough information to make such categorical determinations. In that event, the Department would revise the NO_x monitoring

conditions. The Department may determine that to assure compliance it is necessary to retain or increase the current monitoring frequency.

These conditions do not include the initial NSPS performance test requirements as the Subpart A conditions cover these requirements. If an existing or new turbine under this permit is still subject to the performance test requirement of 40 C.F.R. 60.8 is covered under the Subpart A related conditions.

The intent of these conditions is that turbines or groups of turbines be routinely tested on no less than a 5-year cycle. If the most recent performance test on a turbine showed NO_x emissions at less than or equal to 90% of the limit shown in Condition 21, then periodic monitoring is required at the first applicable of three criteria: either within 5 years of the last performance test, or within a year of the issue date of the permit, or within a year of exceeding 400 hours of operation within a 12-month period. If the most recent performance test showed operations at greater than 90% of the emissions listed in Condition 21, then periodic monitoring source testing is required every year until two consecutive tests show emissions at less than or equal to 90% of the limit.

The condition does not state how load must be measured. For some turbines it may be possible to directly measure load as either mechanical or electrical output. For others, it may be necessary to calculate load indirectly based on measurements of other parameters. The Department is not attempting to dictate what method is most appropriate through the permit condition, but should evaluate the adequacy of methods of calculating load based on the load monitoring proposed by the Permittee.

Subpart GG defines “emergency gas turbine⁶” and exempts turbines meeting that definition from the GG emission standards. Some turbines may be operated as standby equipment but not meet the definition of emergency turbine, so the Department has added a Method 20 or Method 7E monitoring threshold of 400 hours per 12-month period. For turbines expected to operate less than 400 hours the Department has also added recordkeeping for hours of operation. The Department does not intend to require the Permittee to operate a turbine solely for the purpose of testing.

The condition requires testing at a range of loads, consistent with the performance test requirements in Subpart GG, that is, test at 30, 50, 75, and 100 percent load. If testing at these four loads is not reasonable, the condition allows the Permittee to propose to the Department what test loads will be reasonable and adequate, and the Department will have the responsibility to make a finding on that proposal. If EPA has already approved alternative test loads for the initial performance test the Department would allow those test loads if the information that went into that decision were still representative of the turbine operation.

In Condition 21, the Department considers “fuel type” to mean, for liquid fuels a type of fuel as described in an ASTM or similar fuel specification.

Load measurements or load calculations from load surrogate measurements are for one-hour periods. The intent is to match the averaging period for the test method. Method 20

⁶ *Emergency Gas Turbine* means any stationary gas turbine that operates as a mechanical or electrical power source only when the primary power source for a facility has been rendered inoperable by an emergency situation, as defined in 40 C.F.R. 60.331(e), effective 7/1/07.

identifies a number of traverse points that vary with the size of the stack. From these points the tester is to choose at least 8 points for NO_x measurements. The time at each point is to be at least one minute plus the average response time of the instrument. The recorded value is the average steady state response. Presumably, the steady state response would exclude some or all of the response time of the instrument. Three runs are to be done at each test load.

The three runs would represent 24 minutes of measurement time or more. A one-hour average load is therefore a reasonable approximation of a load period corresponding to the test method.

Conditions 22, NSPS Subpart GG Sulfur Standard

Legal Basis: This condition requires the Permittee to comply with NSPS Subpart GG SO₂ or fuel quality monitoring, record keeping and reporting. For UOCC facilities in the Cook Inlet subject to NSPS regulations, the EPA granted UOCC a custom fuel monitoring schedule on October 17, 2002 for the current fuel gas source.

Factual Basis: Monitoring, recordkeeping, and reporting requirements for this condition are described in NSPS Subpart GG and in an EPA granted custom fuel sulfur monitoring schedule and have been referenced here. No additional monitoring outside of the Subpart GG requirements is necessary to ensure compliance with the NSPS SO₂ standard.

Monitoring: Condition 22.1 incorporates NSPS Subpart GG fuel sulfur monitoring requirements.

EPA Custom Fuel Monitoring Schedule Condition 22.1 - The affected facility turbines have been permitted by EPA to use an alternative monitoring schedule for monitoring hydrogen sulfide in fuel gas as described in this condition. Furthermore, UOCC may use the length of stain tube test to monitor gas sulfur content as approved by EPA on July 30, 2002 for the current fuel gas source.

Recordkeeping: The Permittee is required to maintain records of all sulfur monitoring data required by NSPS Subpart GG for five years as set out in 18 AAC 50.350(h)(5). This requirement is stated in Condition 50.

Reporting: NSPS Subpart GG SO₂ standard reporting requirements are incorporated in the permit in Condition 22.3. For the purpose of the EEMSP reports and operating report required under 40 C.F.R. 60.7(c), report daily periods during which the sulfur content of the fuel being fired in the turbine exceeds 0.8 percent, or emissions exceed 150 ppmvd as excess emissions. In Condition 22.3 the Department requests that a summary report of the results from the monitoring requirements in Condition 22.1 be included in the Operating Report required under Condition 55.

Conditions 23 - 25, Standard Terms and Conditions

Legal Basis: These are standard conditions required under 18 AAC 50.345(a) and (e)-(g) for all operating permits. This provision is incorporated in the federally approved Alaska operating permit program of November 30, 2001.

Factual Basis: These are standard conditions that apply to all permits.

Conditions 26, Administration Fees

Legal basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.400-405 as derived from AS 46.14.130. This condition requires the Permittee, owner, or operator to pay administration fees as set out in regulation. Paying administration fees is required as part of obtaining and holding a permit with the Department or as a fee for a Department action.

Factual Basis: The owner or operator of a stationary source who is required to apply for a permit under AS 46.14.130 shall pay to the Department all assessed permit administration fees. The regulations in 18 AAC 50.400-405 specify the amount, payment period, and the frequency of fees applicable to a permit action.

Conditions 27 - 28, Emission Fees

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.410-420. The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These emission fee conditions are Standard Condition I under 18 AAC 50.346(b) adopted pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of AS 46.14.250. No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of AS 46.14.250.

These standard conditions require the Permittee to pay fees in accordance with the Department's billing regulations. The billing regulations set the due dates for payment of fees based on the billing date. The Department modified the standard condition to correct Condition 28.2 such that it referenced "submitted" (i.e., postmarked) rather than "received" in accordance with the timeframe of Condition 28.1.

The default assessable emissions are generally potential emissions of each air pollutant in excess of 10 tons per year authorized by the permit (AS 46.14.250(h)(1)(A)).

The conditions allow the Permittee to calculate **actual** annual assessable emissions based on previous actual annual emissions. According to AS 46.14.250(h)(1)(B), assessable emissions are based on each air pollutant. Therefore, fees based on actual emissions shall be paid on any pollutant emitted whether or not the permit contains any limitation of that pollutant.

This standard condition specifies that, unless otherwise approved by the Department, calculations of assessable emission based on actual emissions use the most recent previous calendar year's emissions. Since each current year's assessable emission are based on the previous year, the Department will not give refunds or make additional billings at the end of the current year if the estimated emissions and current year actual emissions do not match.

Condition 29, Good Air Pollution Control Practice

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.346(b)(5) and applies to all emission units, **except** those subject to federal emission standards (EU IDs 1 and 2), those subject to continuous emission or parametric monitoring, and for insignificant emission units.

Factual Basis: The condition requires the Permittee to comply with good air pollution control practices for all sources.

The Department adopted this condition under 18 AAC 50.346(b) as Standard operating Permit Condition VI pursuant to AS 46.14.010(d). The Department determined that this standard condition adequately meets the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard condition meets the requirements of 40 CFR 71.6(a)(3).

Maintaining and operating equipment in good working order is fundamental to preventing unnecessary or excess emissions. Standard conditions for monitoring compliance with emission standards are based on the assumption that good maintenance is performed. Without appropriate maintenance, equipment can deteriorate more quickly than with appropriate maintenance. If appropriate maintenance is not applied to the equipment, the Department may have to apply more frequent periodic monitoring requirements (unless the monitoring is already continuous) to ensure that the monitoring results are representative of actual emissions.

The Permittee is required to keep maintenance records to show that proper maintenance procedures were followed, and to make the records available to the Department. The Department may use these records as a trigger for requesting source testing if the records show that maintenance has been deferred.

Condition 30, Dilution

Legal Basis: This condition prohibits the Permittee from using dilution as an emission control strategy as set out in 18 AAC 50.045(a). This state regulation applies to the Permittee because the Permittee is subject to emission standards in 18 AAC 50.

Factual Basis: The condition prohibits the Permittee from diluting emissions as a means of compliance with any standard in 18 AAC 50.

Condition 31, Reasonable Precautions to Prevent Fugitive Dust

Legal Basis: This condition requires the Permittee to use reasonable precautions when handling, storing or transporting bulk materials or engaging in an industrial activity in accordance with the applicable requirement in 18 AAC 50.045(d). Bulk material handling requirements apply to the Permittee because the Permittee may engage in bulk material handling, transporting, or storing; or may engage in industrial activity at the stationary source.

Factual Basis: The condition requires the Permittee to comply with 18 AAC 50.045(d), and take reasonable action to prevent particulate matter (PM) from being emitted into the ambient air.

Condition 32, Stack Injection

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.045(e)-(f). It prohibits the Permittee from releasing materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack (i.e. disposing of material by injecting it into a stack). Stack injection

requirements apply to the stationary source because the stationary source contains a stack or source constructed or modified after November 1, 1982.

Factual Basis: No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the source or stack would need to be modified to accommodate stack injection.

Condition 33, Air Pollution Prohibited

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.110. The condition prohibits the Permittee from causing 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. Air Pollution Prohibited requirements apply to the stationary source because the stationary source will have emissions.

Factual Basis: While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can cause violations of this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

ADEC adopted this standard condition into 18 AAC 50.346(a) pursuant to AS 46.14.010(d). The Department determined that this condition adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard condition meets the requirements of 40 CFR 71.6(a)(3).

The Permittee is required to report any complaints and injurious emissions. The Permittee must keep records of the date, time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints, and to submit copies of these records upon request of the Department.

Condition 34, Technology-Based Emission Standard

Legal Basis: The Permittee is required to take reasonable steps to minimize emissions if certain activity causes an exceedance of any technology-based emission standard in this permit. This condition ensures compliance with the applicable requirement in 18 AAC 50.235. Technology Based Emission Standard requirements apply to the stationary source because the stationary source contains equipment subject to a technology-based emission standard, such as BACT, MACT, LAER, NSPS or other “technologically feasible” determinations.

Factual Basis: The conditions of this permit list applicable technology-based emission standards and require excess emission reporting for each standard in accordance with Condition 54. Excess emission reporting under Condition 54 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under Condition 54.

Condition 35, Asbestos NESHP

Legal Basis: The condition requires the Permittee to comply with asbestos demolition or renovation requirements in 40 C.F.R. 61, Subpart M. This condition ensures compliance

with the applicable requirement in 18 AAC 50.040(b)(1) and (2)(F). The asbestos demolition and renovation requirements apply if the Permittee engages in asbestos demolition or renovation.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with these federal regulations.

Condition 36, Refrigerant Recycling and Disposal

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(d) and applies if the Permittee engages in the recycling or disposal of certain refrigerants. The condition requires the Permittee to comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F, that will apply if the Permittee uses certain refrigerants.

Factual Basis: Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient to ensure compliance with this federal regulation.

Conditions 37 - 38, Halon Prohibitions

Legal Basis: These prohibitions apply to all stationary sources that use halon for fire extinguishing and explosion inerting. The condition prohibits the Permittee from causing or allowing violations of these prohibitions. The Monopod Platform uses halon and is therefore subject to the federal regulations contained in 40 C.F.R. 82.

Factual Basis: These conditions incorporate applicable 40 C.F.R. 82 requirements.

Condition 39, Open Burning

Legal Basis: The Permittee has requested this condition. The Permittee has certified that no open burning is conducted at the platform.

Factual Basis: Extensive monitoring and recordkeeping is not warranted because the Permittee has requested a permit condition to prohibit open burning at the stationary source.

Condition 40, Requested Source Tests

Legal Basis: The Permittee is required to conduct source tests as requested by the Department. The Department adopted this condition under 18 AAC 50.345(k) as part of its operating permit program approved by EPA November 30, 2001.

Factual Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.220(a) and applies because this is a standard condition to be included in all operating permits. Monitoring consists of conducting the requested source test.

Conditions 41 - 43, Operating Conditions, Reference Test Methods, Excess Air Requirements

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.220(b) and applies because the Permittee is required to conduct source tests by this

permit. The Permittee is required to conduct source test as set out in Conditions 41 through 43.

Factual Basis: These conditions supplement the specific monitoring requirements stated elsewhere in this permit. Compliance monitoring with Conditions 41 through 43 consist of the test reports required by Condition 48.

Condition 44, Test Exemption

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.345(a) and applies when the source exhaust is observed for visible emissions.

Factual Basis: As provided in 18 AAC 50.345(a), amended May 3, 2002, the requirements for test plans, notifications and reports do not apply to visible emissions observations by smoke readers, except in connection with required particulate matter testing.

Conditions 45 - 48, Test Deadline Extension, Test Plans, Notifications and Reports

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.345(l)-(o) and applies because the Permittee is required to conduct source test by this permit.

Factual Basis: Standard conditions 18 AAC 50.345(l) - (o) are incorporated through these conditions. These standard conditions supplement specific monitoring requirements stated elsewhere in this permit. The source test itself monitors compliance with this condition.

Condition 49, Particulate Matter (PM) Calculations

Legal Basis: This condition requires the Permittee to reduce particulate matter data in accord with 18 AAC 50.220(f). It applies when the Permittee tests for compliance with the PM standards in 18 AAC 50.050 or 50.055.

Factual Basis: The condition incorporates a regulatory requirement for PM source tests. This condition supplements specific monitoring requirements stated elsewhere in this permit.

Condition 50, Recordkeeping Requirements

Legal Basis: Applies because the Permittee is required by the permit to keep records.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide an evidence of compliance with this requirement.

Condition 51, Certification

Legal Basis: This condition requires the Permittee to comply with the certification requirement in 18 AAC 50.205 and applies to all Permittees under EPA's approved operating permit program of November 30, 2001.

Factual Basis: This standard condition is required in all operating permits under 18 AAC 50.345(j).

This condition requires the Permittee to certify any permit application, report, affirmation, or compliance certification submitted to the Department. To ease the certification burden on the Permittee, the condition allows the excess emission reports to be **certified** with the stationary source report, even though it must still be **submitted** more frequently than the stationary

source operating report. This condition supplements the reporting requirements of this permit.

Condition 52, Submittals

Legal Basis: This condition requires the Permittee to comply with standardized reporting requirement in 18 AAC 50.326(j) and applies because the Permittee is required to send reports to the Department.

Factual Basis: This condition lists the Department's appropriate address for reports and written notices. Receipt of the submittal at the correct Department office is sufficient monitoring for this condition. This condition supplements the standard reporting and notification requirements of this permit.

Condition 53, Information Requests

Legal Basis: This condition requires the Permittee to submit requested information to the Department. This is a standard condition from 18 AAC 50.345(i) of the state approved operating permit program effective November 30, 2001.

Factual Basis: This condition requires the Permittee to submit information requested by the Department. Monitoring consists of receipt of the requested information.

Condition 54, Excess Emission and Permit Deviation Reports

Legal Basis: This condition requires the Permittee to comply with the applicable requirement in 18 AAC 50.235(a)(2) and 18 AAC 50.240. Also, the Permittee is required to notify the Department when emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two state regulations related to excess emissions - the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The Department adopted this condition as Standard Operating Permit Condition III under 18 AAC 50.346(c) pursuant to AS 46.14.010(d). The Department determined that this standard condition adequately meet the requirements of 40 CFR 71.6(a)(3). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3). The Department made a correction to the Standard Operating Permit Condition III to allow identical reporting methodology for both Excess Emissions and Permit Deviations reports which use identical forms and should have identical submissions methods.

Section 12, Notification Form

The Department modified the notification form contained in Standard Permit Condition IV in a revised rulemaking dated August 20, 2008 to more adequately meet the requirements of Chapter 50, Air Quality Control. The modification consisted of correcting typos and moving failure to monitor/report and recordkeeping to the permit deviations Section 2.

Condition 55, Operating Reports

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.346(b)(6) and applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit. The reports themselves provide monitoring for compliance with this condition.

The Department used the Standard Permit Condition VII as adopted into regulation on August 20, 2008. For reporting, MR&R conditions are Standard Permit Condition VII adopted into regulation pursuant to AS 46.14.010(d). The Department determined that these standard conditions adequately meet the requirements of 40 CFR 71.6(a)(3)(iii)(A). No emission unit or stationary source operational or compliance factors indicate that unit-specific or stationary-source specific conditions would better meet these requirements. Therefore, the Department concluded that the standard conditions meet the requirements of 40 CFR 71.6(a)(3).

Condition 56, Annual Compliance Certification

Legal Basis: This condition ensures compliance with the applicable requirement in 18 AAC 50.040(j)(4) and applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Each annual certification provide monitoring records for compliance with this condition.

Condition 56.2 provides clarification of transition periods between an expiring permit and a renewal permit to ensure that the Permittee certifies compliance with the permit terms and conditions of the permit that was in effect during those partial date periods involved in the transition. No format is specified: the Permittee may provide one report certifying compliance with each permit term or condition and the effective permit at that time, or may chose to provide two reports – one certifying compliance with permit terms and conditions from January 1 until the date of expiration of the old permit, and a second report certifying compliance with terms and conditions in effect from the effective date of the renewal permit until December 31.

The Permittee may submit one of the required copies electronically at their discretion. This change more adequately meets the requirements of 18 AAC 50 and agency needs, as the Department can more efficiently distribute the electronic copy to staff in other locations.

Condition 57, NSPS and NESHAP Reports

Legal Basis: The Permittee is required to provide the federal administrator and Department a copy of each emission unit report for units subject to NSPS or NESHAP federal regulations under 18 AAC 50.326(j)(4). 40 CFR 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: The condition supplements the specific reporting requirements in 40 C.F.R. 60, 40 C.F.R. 61, and 40 C.F.R. 63. The reports themselves provide monitoring for compliance with this condition.

Condition 58, Permit Applications and Submittals

Legal Basis: The Permittee may need to submit permit applications and related correspondence.

Factual Basis: Standard Condition XIV directs the applicant to send copies of all application materials required to be submitted to the Department directly to the EPA, in electronic format if practicable. This condition shifts the burden of compliance from the Department to ensure that copies of application materials are submitted to EPA by transferring that responsibility to the Permittee.

Conditions 59 - 61, Permit changes and revisions requirements

Legal Basis: The Permittee is obligated to notify the Department of certain off-permit source changes and operational changes under 18 AAC 50.326(j)(4). 40 CFR 71.6(a)(10), (12), and (13) incorporated by reference under 18 AAC 50.040(j) require these provisions within this permit. 40 CFR 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: These are conditions required in 40 CFR 71.6 for all operating permits to allow changes within a permitted stationary source without requiring a permit revision.

The Permittee did not request trading of emission increases and decreases as described in 71.6(a)(13)(iii).

Condition 62, Permit Renewal

Legal Basis: The Permittee must submit a timely and complete operating permit renewal application if the Permittee intends to continue source operations in accord with the operating permit program under 18 AAC 50.326(j)(3). The obligations for a timely and complete operating permit application are set out in 40 CFR 71.5 incorporated by reference in 18 AAC 50.040(j)(3). 40 CFR 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: In accordance with AS 46.14.230(a), this operating permit is issued for a fixed term of five years after the date of issuance, unless a shorter term is requested by the permit applicant. The Permittee is required to submit an application for permit renewal by the specific dates applicable to Monopod Platform as listed in this condition. As stated in 40 CFR 71.5(a)(1)(iii), submission for a permit renewal application is considered timely if it is submitted at least six months but no more than eighteen months prior to expiration of the operating permit. According to 71.5(a)(2), a complete renewal application is one that provides all information required pursuant to 40 CFR 71.5(c) and must remit payment of fees owed under the fee schedule established pursuant to 18 AAC 50.400. 40 CFR 71.7(b) states that if a source submits a timely and complete application for permit issuance (including renewal), the source's failure to have a permit is not a violation until the permitting authority takes final action on the permit application.

Therefore, for as long as an application has been submitted within the timeframe allowed under 40 CFR 71.5(a)(1)(iii), and is complete before the expiration date of the existing

permit, then the expiration of the existing permit is extended and the Permittee has the right to operate under that permit until the effective date of the new permit. However, this protection shall cease to apply if, subsequent to the completeness determination, the applicant fails to submit by the deadline specified in writing by the Department any additional information needed to process the application. Monitoring, recordkeeping, and reporting for this condition consist of the application submittal.

Condition 63 - 64, Permit Applications

Legal Basis: These conditions set out the protocol the Permittee must follow to submit amendment, modification and renewal applications to the Department under 18 AAC 50.326(j)(3) and to the Federal Administrator under 40 CFR 71.5, 71.7 and 71.10.

Factual Basis: These conditions direct the Permittee to submit application materials to the Department's Anchorage office. The current address at time of permit issuance is provided in a footnote because it may change during the life of this permit. The current address can be obtained by contacting the Department, checking the website, or by other reasonable means. The Permittee may submit copies of application materials in electronic formats compatible with ADEC software as the Department can more efficiently distribute the electronic copy to staff in other locations. Condition 64 directs the applicant to send copies of all application materials directly to the EPA, in electronic format if practicable.

Conditions 65 - 69, General Compliance Requirements and Schedule

Legal Basis: These conditions ensure compliance with the applicable requirement in 18 AAC 50.326(j)(3). The Permittee is required to comply with these standard conditions set out in 18 AAC 50.345 included in all operating permits. 40 CFR 70 Appendix A documents that EPA fully approved the Alaska operating permit program effective November 30, 2001.

Factual Basis: These are standard conditions for compliance required for all operating permits.

Conditions 70 - 71, Permit Shield

Legal Basis These conditions ensure compliance with the applicable requirement in 18 AAC 50.326(j) and apply because the Permittee has requested that the Department shield the source from the applicable requirements listed under this condition under the Federally approved State operating program effective November 30, 2001

Factual Basis: Table B of Operating Permit No. AQ0067TVP02 shows the permit shield that the Department granted to the Permittee. The following table shows the requests that were denied and the reasons that they were denied. The Department based the determinations on the permit application, past operating permit, likelihood for the source to become subject during the life of the permit, Title I permits and inspection reports.

Table E - Permit Shields Denied

Shield requested for:	Reason for shield request:	Reason for request denial:
Stationary Gas Turbines EU IDs 1 and 2		
40 CFR 60 Subpart KKKK	EU IDs 1 – 2 were constructed before February 18, 2005 and have not been modified or reconstructed after this date.	It is likely that these emission units will be modified or reconstructed during the life of this permit.
Compression Ignition Engines EU IDs 11 – 14		
40 CFR 60 Subpart IIII	Monopod Platform does not contain equipment meeting the applicability criteria under 40 CFR 60.4200(a).	These emissions units may become affected sources during modification or reconstruction during the term of the permit.
Stationary Gas Turbines EU IDs 3 – 7		
40 CFR 60 Subpart KKKK	EU IDs 3 - 7 were constructed before February 18, 2005 and have not been modified or reconstructed after this date.	These emissions units may become affected sources during modification or reconstruction during the term of the permit.
Spark Ignition Engines EU IDs 8 – 10		
40 CFR 60 Subpart JJJJ	Monopod Platform does not contain equipment meeting the applicability criteria under 40 CFR 60.4230.	These emissions units may become affected sources during modification or reconstruction during the term of the permit.
Reciprocating IC Engines EU IDs 8 – 14		
40 CFR 63 Subpart ZZZZ	EU IDs 8 - 14 were constructed before June 16, 2007 and have not been modified or reconstructed after this date.	These emissions units may become affected sources during modification or reconstruction during the term of the permit.