

**ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR PERMITS PROGRAM**

TECHNICAL ANALYSIS REPORT
For Air Quality Control Minor Permit AQ0267MSS04

ConocoPhillips Alaska Inc. (CPAI)
Kuparuk Central Production Facility #1 (CPF1)

**TITLE I PERMIT REVISION –DRILL SITE 1R (DS1R) INJECTION PUMP
ENGINES**

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ABBREVIATIONS/ACRONYMS

AAC.....	Alaska Administrative Code
CPAI.....	ConocoPhillips Alaska Inc.
CPF1	Kuparuk Central Production Facility #1
DS1R	Drill Site 1R of Kuparuk Central Production Facility #1
EPA.....	Environmental Protection Agency
ORL.....	Owner Requested Limit
PSD.....	Prevention of Significant Deterioration
PTE.....	Potential to Emit
TAR.....	Technical Analysis Report

1.0 Introduction

This Technical Analysis Report (TAR) provides the Alaska Department of Environmental Conservation's (Department's) basis for issuing Air Quality Control Minor Permit AQ0267MSS04 to ConocoPhillips Alaska, Inc (CPAI) for the Kuparuk Central Production Facility #1 (CPF1) Drill Site 1R (DS1R) well injection pump engines project. In this minor permit, the Department revises the record keeping language specified for compliance with recording keeping activities authorized in previous permit AQ0267MSS03.

1.1 Stationary Source Description

CPF1 is an existing Prevention of Significant Deterioration (PSD) major stationary source located in the Kuparuk River Unit. DS1R is located four miles north of CPF1. For air quality purposes, DS1R is considered part of CPF1. Because DS1R is part of CPF1, any change to DS1R is a modification to CPF1.

Emission units currently permitted at DS1R consist of a line heater and a freeze protection pump. The area surrounding CPF1 is classified as attainment or unclassifiable for all pollutants and is classified as a Class II area of the Northern Alaska Intrastate Air Quality Control Region.

1.2 Project Description

Condition 3.3 of Minor Permit AQ0267MSS03 requires CPF1 to maintain records of fuel consumption by units 64 and 65 as follows:

'By the last day of each month, add the previous month's total to the preceding 11 months to get the 12 consecutive months total'.

CPF1 wants the Department to revise Condition 3.3 as follows:

'By the fifteenth calendar day after the last day of the previous month, add the previous month's total to the preceding 11 months to get the 12 consecutive months total'.

Section 1.3 lists the Department's findings regarding this application.

1.3 Department Findings

1. CPF1 plant is a PSD major stationary source because the existing PTE exceeds 250 tpy for a regulated pollutant.
2. In their application, CPF1 requested that the Department revise Condition 3.3 of Minor Permit AQ0267MSS03.
3. The Department is required to change terms of a Title I permit (Minor permit AQ0267MSS03) under 18 AAC 50.508(6).
4. The proposed modification will not have any effect on emissions since the running total for 12 consecutive months consumption will not change. The modification gives greater operational flexibility and decreases the potential for permit deviation on a recordkeeping condition while maintaining the fuel consumption limit that meets the intent of the owner-requested limit (ORL). Therefore, the modification will not be subject to further review.
5. On their *Stationary Source Identification Form*, CPF1 requested that the Department process the application using the Public Comment procedures in 18 AAC 50.542(d)

so the Department is processing the application using the public comment procedures in 18 AAC 50.542(d).

2.0 Permit Conditions

2.1 Requirements for all Minor Permits

As described in 18 AAC 50.544(a), this minor permit identifies the stationary source, the project, the Permittee, and contact information.

Although the permit is required under 18 AAC 50.544(a) to contain the fee requirements of 18 AAC 50.400 – 18 AAC 50.499, this permit action does not contain any change to the assessable emissions. The Department will invoice the Permittee for fee due as allowed by 18 AAC 50.400(m) (7).

2.2 Requirements for a Minor Permit that Revises or Rescinds a Previous Title I Permit

As required in 18 AAC 50.544(i), this minor permit contains terms and conditions as necessary to ensure that the Permittee will construct and operate the stationary source in accordance with 18 AAC 50. In this minor permit, the Department has revised Condition 3.3 of Minor Permit AQ0267MSS03. The permit ensures that the Permittee will continue to operate the source in accordance with the chapter as described in this section.

2.2.1 Ambient Air Quality Analysis

CPAI has previously demonstrated that the CPF1 plant as authorized by Permit AQ0267MSS03 complies with the Ambient Air Quality Standards listed in 18 AAC 50.010 for all pollutants. Since CPAI is not proposing any emissions increase as part of this permit action, no additional ambient demonstrations are needed.

2.2.2 Title I Permit Conditions Revisions

The Department revised Condition 3.3 of Permit AQ0267MSS03 to allow CPAI to base record keeping on the fifteenth calendar after the last day of the previous month instead of the last day of each month. This permit will continue to keep the CPF1 plant below the PSD modification thresholds for actions authorized in Permit AQ0267MSS04.

2.3 Other Permit Conditions

The minor permit contains additional requirements as necessary to ensure that the Permittee will construct and operate the stationary source in accordance with 18 AAC 50, as described in 18 AAC 50.544(i). These requirements are listed in the minor permit under “Terms to Make Permit Enforceable”.

3.0 Permit Administration

Minor Permit AQ0267MSS04 rescinds and replaces Condition 3.3 of Permit AQ0267MSS03, but does not replace Minor Permit AQ0267MSS03. Terms and conditions of Permit AQ0267MSS03 are still in effect except as revised in Minor Permit AQ0267MSS04.

The Department has not yet incorporated Minor Permit AQ0267MSS03 into the operating permit. As such, CPAI may operate under AQ0267MSS04 without revising the operating permit.