

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY OPERATING PERMIT

Permit No. AQ0182TVP02

Issue Date: Public Comment - April 19, 2012

Expiration Date: Five Years

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **BP Exploration (Alaska) Inc.**, for the operation of the **Gathering Center #1 (GC#1)**.

The stationary source, as defined by this permit, is the surface structures and their associated permanent emission units located on the GC#1 production pad and Prudhoe Bay Unit (PBU) well pads D, E, F, G, K, Y, and P. Temporary emission units (e.g., drill rigs and associated activities and oil production support equipment) that periodically operate at these well pads are governed by a separate operating permit.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b). As set out in AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

Citations listed herein are contained within 18 AAC 50 dated September 17 2011, Register 199. All federal regulation citations are from those sections adopted by reference in this version of regulation in 18 AAC 50.040 unless otherwise specified.

All stationary source-specific terms and conditions of Operating/Construction Permit No. AQ0182TVP01 Revision 2 have been incorporated into this operating permit.

Upon effective date of this permit, Operating/Construction Permit No. AQ0182TVP01 Revision 2 expires, except that the construction permit terms identified by citation specific to Permit No. AQ0182TVP01 Revision 2 remain in effect until modified or replaced by a Title I permitting action under 18 AAC 50.

This operating permit becomes effective **<insert date—30 days after issue date>**.

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John F. Kuterbach, Manager  
Air Permits Program

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### List of Abbreviations Used in this Permit

AAC .....	Alaska Administrative Code	MMscf/hr .....	Million Standard Cubic Feet per Hour
AAAQS .....	Alaska Ambient Air Quality Standards	MR&R .....	Monitoring, Recordkeeping, and Reporting
ADEC .....	Alaska Department of Environmental Conservation	NESHAPs .....	Federal National Emission Standards for Hazardous Air Pollutants [NESHAPs as contained in 40 C.F.R. 61 and 63]
AS .....	Alaska Statutes	NG .....	Natural Gas
ASTM .....	American Society for Testing and Materials	NGL .....	Natural Gas Liquids
BACT .....	Best Available Control Technology	NOx .....	Nitrogen Oxides
Bbls .....	U.S. Petroleum Barrels (42 gallons)	NSPS .....	Federal New Source Performance Standards [NSPS as contained in 40 C.F.R. 60]
BHp .....	Boiler Horsepower; Brake Horsepower	O&M .....	Operation and Maintenance
Btu .....	British thermal unit	O <sub>2</sub> .....	Oxygen
C.F.R. ....	Code of Federal Regulations	PAL .....	Plantwide Applicability Limitation
CI .....	Compression Ignition	PM-10 .....	Particulate Matter less than or equal to a nominal ten microns in diameter
The Act .....	Clean Air Act	ppm .....	Parts per million
CO .....	Carbon Monoxide	ppmv, ppmvd ..	Parts per million by volume on a dry basis
CO <sub>2</sub> .....	Carbon Dioxide	PS .....	Performance Specification
CO <sub>2</sub> e .....	CO <sub>2</sub> equivalent emissions	psia .....	Pounds per Square Inch (absolute)
dscf .....	Dry standard cubic foot	PSD .....	Prevention of Significant Deterioration
EPA .....	US Environmental Protection Agency	PSI .....	Pounds per Square Inch (pressure)
EU .....	Emission Unit	PTE .....	Potential to Emit
GHG .....	Greenhouse Gas	RICE .....	Reciprocating Internal Combustion Engine
gr/dscf .....	Grain per dry standard cubic foot (1 pound = 7000 grains)	RM .....	Reference Method
GPH .....	Gallons per hour	S .....	Sulfur
HAPs .....	Hazardous Air Pollutants [HAPs as defined in AS 46.14.990(14)]	SIC .....	Standard Industrial Classification
Hp .....	Horsepower	SO <sub>2</sub> .....	Sulfur dioxide
H <sub>2</sub> S .....	Hydrogen Sulfide	TPH .....	Tons per hour
ICE .....	Internal Combustion Engine	TPY .....	Tons per year
ID .....	Emission Unit Identification Number	ULSD .....	Ultra-Low Sulfur Diesel
ISO .....	International Organization for Standardization (Operating conditions corresponding to sea level and 59 deg. F)	VOC .....	Volatile organic compound [VOC as defined in 40 C.F.R. 51.100(s)]
kPa .....	KiloPascals	VOL .....	Volatile organic liquid [VOL as defined in 40 C.F.R. 60.111b, Subpart Kb]
kW .....	Kilowatt	vol% .....	Volume percent
kW-e .....	kiloWatts electric <sup>1</sup>	wt% .....	weight percent
LAER .....	Lowest Achievable Emission Rate		
LHV .....	Lower Heating Value		
MACT .....	Maximum Achievable Control Technology as defined in 40 C.F.R. 63		
MMBtu .....	Million British Thermal Units		
MMBtu/hr .....	Million British Thermal Units per Hour		
MMscf .....	Million Standard Cubic Feet		

<sup>1</sup> kW-e refers to rated generator electrical output rather than engine output.

## Section 1. Stationary Source Information

### Identification

Permittee:	<b>BP Exploration (Alaska) Inc.</b> 900 East Benson Blvd. (zip 99508) P.O. Box 196612 Anchorage, AK 99519-6612	
Stationary Source Name:	<b>Gathering Center #1 (GC#1)</b>	
Location:	Prudhoe Bay, Alaska Section 13, Township 11N, Range 13E, Umiat Meridian	
Physical Address:	Prudhoe Bay, Alaska UTM Zone 6, 446100 E, 7798300 N	
Owners:	BP Exploration (Alaska) Inc. 900 East Benson Blvd. (zip 99508) P.O. Box 196612 Anchorage, AK 99519-6612	ConocoPhillips Alaska Inc. 700 G St. (zip 99501) P.O. Box 100360 Anchorage, AK 99510-0360
	Chevron USA Inc. P.O. Box 36366 Houston, TX 77236	Exxon Mobil Alaska Production, Inc. 3301 C St., Ste. 400 (zip 99503) P.O. Box 196601 Anchorage, AK 99519-6601
Operator:	BP Exploration (Alaska) Inc.	
Permittee's Responsible Official:	Mr. Dale Kruger Greater Prudhoe Bay Operations Manager BP Exploration (Alaska) Inc.	
Designated Agent:	CT Corporation Systems 9360 Glacier Hwy., Ste 202 Juneau, AK 99801	
Permit and Fee Contact:	Rachel Buckbee Environmental Advisor BP Exploration (Alaska) Inc. <a href="mailto:Rachel.Buckbee@bp.com">Rachel.Buckbee@bp.com</a> (907) 564-5363	
Stationary Source and Building Contact:	Joel Krueger or Michael Schoonmaker BP Exploration (Alaska) Inc. <a href="mailto:AKOpsGC1FacilityOTL@bp.com">AKOpsGC1FacilityOTL@bp.com</a> (907) 659-4087	
Process Description SIC Code: NAICS Code:	1311 -- Crude Oil and Natural Gas Production 211111 - Crude Petroleum and Natural Gas Extraction	

[18 AAC 50.040(j)(3); 18 AAC 50.326(a)]  
[40 C.F.R. 71.5(c)(1) & (2)]

## Section 2. Emission Unit Inventory and Description

Emission units listed in Table A have specific monitoring, recordkeeping, or reporting conditions in this permit. Emission unit descriptions and ratings are given for identification purposes only.

**Table A – Emission Unit Inventory**<sup>1,2</sup>

EU ID	Tag No.	Emission Unit Description	Rating/Size	Commenced Construction, Startup, or Modification/ Reconstruction Date <sup>3</sup>
Group I - Gas Turbines at the Production Pad				
1	GTRB-01-7000	GE MS5352B Compressor	35,000 Hp ISO	Commenced Construction Prior to December 1981
2	GTRB-01-7001	GE MS5352B Compressor	35,000 Hp ISO	
5	GTRB-51-3204	Cooper Rolls RB211-24C Compressor	33,000 Hp ISO	
6	GTRB-51-3304	Cooper Rolls RB211-24C Compressor	33,300 Hp ISO	Commenced Construction Prior to June 1981
7	GTRB-01-7704A	Sulzer S3 Pump	7,910 Hp ISO	
8	GTRB-01-7704B	Sulzer S3 Pump	7,910 Hp ISO	
Group II - Gas Fired Heaters at the Production Pad				
12	H-51-8002A	Econotherm John Zink Burners	320 MMBtu/hr <sup>4</sup> [302.5 MMBtu/hr (fresh air firing mode; heat input, LHV)]	Commenced Construction Prior to 1984
13	H-51-8002B	Econotherm John Zink Burners	320 MMBtu/hr <sup>4</sup> [302.5 MMBtu/hr (fresh air firing mode; heat input, LHV)]	
14	B-01-0001	Cleaver Brooks EG Boiler	20.9 MMBtu/hr [heat input, LHV]	Commenced Construction Prior to August 1978
15	B-01-0002	Cleaver Brooks EG Boiler	20.9 MMBtu/hr [heat input, LHV]	
16	B-01-0003	Cleaver Brooks EG Heater	20.9 MMBtu/hr [heat input, LHV]	
17	B-01-0004	Cleaver Brooks EG Heater	20.9 MMBtu/hr [heat input, LHV]	
18	B-01-0067	BS&B TEG Reboiler	8.2 MMBtu/hr [heat input, LHV]	Modified October 1990
19	B-01-0068	BS&B TEG Reboiler	8.2 MMBtu/hr [heat input, LHV]	
20	B-01-9920	Smith TEG Reboiler	16.2 MMBtu/hr [heat input, LHV]	Installed 1993
Group III – Liquid Fuel Fired Equipment at the Production Pad				
21	GNED-01-0001	Caterpillar D398 Emergency Generator	550 kW (737.6 Hp)	After 1977
22	GNED-01-0002	Caterpillar D398 Emergency Generator	550 kW (737.6 Hp)	
23	GNED-01-0011	Detroit Diesel Emergency Generator	550 kW (737.6 Hp)	
24	PED-01-7004	Detroit Diesel Emergency Firewater Pump	280 Hp	
25	GNED-51-8001A	Detroit Diesel Emergency Generator	2,685 kW (3600 Hp)	Installed After 1980
26	GTRB-51-8001	Allison 501KB Emergency Turbine Generator	5,000 Hp (3730 kW)	Installed After 1980

EU ID	Tag No.	Emission Unit Description	Rating/Size	Commenced Construction, Startup, or Modification/ Reconstruction Date <sup>3</sup>
41 <sup>6</sup>	PED-51-8001	Detroit Diesel Black Start Engine for the Allison 501KB Turbine	160 hp (approximate)	Installed before 6/12/2006
42 <sup>6</sup>	KED-51-8001A	Lister 1032-LT2A-31-99 Standby Air Compressor	7 hp	Installed before 6/12/2006
Group IV – Flares				
29	FL-01-0003	KALDAIR LP/HP Vertical	1.95 MMscf/day (pilot and purge gas)	Original startup prior to November 1978; Reconstructed June 2006
30	FL-01-0004	Emergency Flares		
31	FL-01-0005	KALDAIR HP Vertical		
32	FL-01-0006	Emergency Flares		
34	FL-01-7001	BP Design Horizontal Burn Pit		After 1980
35	FL-01-7002	Emergency Flare		
36	FL-01-9902	GBA/Corona HP Second Stage Emergency Flare		Original startup in 1993; Reconstructed June 2006
37	FL-01-9907	KALDAIR HP First Stage Emergency Flare		
Group V – Fixed Roof Storage Tanks at the Production Pad Greater Than 10,000 Gallon Capacity				
38	T-01-7703	Slop Oil Tank	493,500 gallons	Constructed 1982
39	T-51-8008	Slop Oil Divert Tank	252,000 gallons	
40 <sup>6</sup>	T-51-8007	ULSD (No. 1 diesel) Storage Tank	672,000 gallons	

Notes:

- The stationary source, as defined by this permit, is the surface structures and their associated permanent emission units located on the GC#1 production pad and Prudhoe Bay Unit well pads D, E, F, G, K, Y, and P.
- EU IDs 3, 4, 9, 10, 11, 27, 28, and 33 (as listed in Permit No. AQ0182TVP01 Rev. 2) have been removed from service and, therefore, are not included in this table. If the Permittee elects to return these units to service, the Permittee would need to submit an off-permit source change notice. The source change proposal may require Title I Permitting.
- Date construction commenced (if known) or the startup date of the unit. If a unit has been modified as defined by AS 46.14.990, then the most recent modification date is provided.
- The firing rate of EU IDs 12 and 13 is limited to 181.5 MMBtu/hr. See Condition 10.
- EU IDs 14 – 17 are no longer dual fuel-fired boilers. The emission units now burn only fuel gas.
- EU IDs 41 and 42 were not listed in the initial Title V permit No. AQ0182TVP01 Emission Unit Inventory Table. These units have actual and potential emissions below the significant emissions thresholds in 18 AAC 50.326(e), however, they are now included in this renewal permit because they are subject to the requirements of NESHAP Subparts A and ZZZZ under Conditions 31 through 36.
- EU ID 40 is an existing tank that was previously used as a methanol (not a petroleum liquid) storage tank but is now used as ULSD (No. 1 diesel) storage tank thereby making the tank subject to NSPS Subpart Ka.

[18 AAC 50.326(a)]  
[40 C.F.R. 71.5(c)(3)]

### ***Section 3. State Requirements***

#### **Visible Emissions Standards**

- 1. Industrial Process and Fuel-Burning Equipment Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 1, 2, 5 – 8, 12 – 26, 29 – 32, 34 – 37, 41, and 42 listed in Table A to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

[18 AAC 50.040(j); 18 AAC 50.055(a)(1); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]

- 1.1 For EU IDs 1, 2, 5 – 8, and 12 – 20, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 71 indicating whether each of these emission units fired only gas. Report under Condition 70 if any fuel is burned other than gas.
- 1.2 For each of EU IDs 21 – 24, as long as the emission unit does not exceed the applicable rolling 12-month operating hour limit in Condition 13, monitoring shall consist of an annual compliance certification under Condition 72 with the visible emissions standard in accordance with Condition 19.4. Otherwise, monitor, record, and report in accordance with Conditions 2 through 4 for the remainder of the permit term.
- 1.3 For EU IDs 25 and 26, monitor, record, and report in accordance with Conditions 2 through 4.
- 1.4 For EU IDs 29 – 32 and 34 – 37, monitor, record, and report in accordance with Condition 5.
- 1.5 For EU IDs 41, if emissions are considered insignificant by operating no more than 800 hours<sup>1</sup> per 12-month rolling period, monitoring shall consist of an annual compliance certification under Condition 72 with the visible emissions standard in accordance with Condition 19.4. Otherwise, monitor, record and report visible emissions in accordance with Conditions 2 through 4 for the duration of the permit term.
- 1.6 For EU ID 42, monitoring shall consist of an annual compliance certification under Condition 72 with the visible emissions standard in accordance with Condition 19.4.

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)]

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<sup>1</sup> The significant thresholds under 18 AAC 50.326(e) are triggered if EU ID 41 exceeds 800 operational hours on a 12-month rolling basis.

## Visible Emissions Monitoring, Recordkeeping and Reporting

### *For Liquid Fuel-Fired Emission Units (EU IDs 21 – 26 and 41)*

- 2. Visible Emissions Monitoring.** The Permittee shall observe the exhaust of EU IDs 21 – 24 (if required under Condition 1.2), EU IDs 25 and 26, and EU ID 41 (if required under Condition 1.5) for visible emissions using the Method 9 Plan under Condition 2.1. The Permittee may for each unit elect to continue the visible emission monitoring schedule in effect from the previous permit at the time a renewed permit is issued, if applicable. The Permittee shall state the intention of using this option in the first operating report required by Condition 71 submitted under the renewed permit.

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)(i)]

- 2.1 Method 9 Plan.** For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations<sup>2</sup>.

- a. First Method 9 Observation.** Perform the first Method 9 observation, as follows:
- (i) For any liquid fuel-fired unit replaced during the term of this permit, observe exhaust for 18 minutes within 30 days of startup.
  - (ii) For each existing emission unit that exceeds the operational threshold in Condition 1.2 or the significant status threshold in Condition 1.5, observe the exhaust for 18 minutes of operations within 30 days after the calendar month during which that threshold has been exceeded, or within 30 days of the unit's next operations, whichever is later.
- b. Monthly Method 9 Observations.** After the first Method 9 observation required by Condition 2.1a, perform 18-minute observations at least once in each calendar month that an emission unit operates.
- c. Semiannual Method 9 Observations.** After observing emissions for three consecutive operating months under Condition 2.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, perform 18-minute observations:
- (i) Within six months after the preceding observation, or
  - (ii) For an emission unit with intermittent operations, during the next scheduled operation immediately following six months after the preceding observation.

<sup>2</sup> Emergency operations are exempt from the visible emissions observations deadlines associated with emission unit "operation" under this condition.



- d. **Annual Method 9 Observations.** After at least two semiannual observations under Condition 2.1c, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, perform 18-minute observations:
    - (i) Within twelve months after the preceding observation; or
    - (ii) For an emission unit with intermittent operations, during the next scheduled operation immediately following twelve months after the preceding observation.
  - e. **Increased Method 9 Frequency.** If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that emission unit to at least monthly as stated in Condition 2.1b, until the criteria in Condition 2.1c for semiannual monitoring are met.
3. **Visible Emissions Recordkeeping.** When required by Conditions 1.2, 1.3 or 1.5 or in the event of replacement of any of EU IDs 21 – 26 and 41 during the permit term, the Permittee shall keep records as follows:
- [18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)(ii)]
- 3.1 When using the Method 9 Plan of Condition 2.1, the observer shall record:
- a. the name of the stationary source, emission unit, and location; emission unit type, observer's name, and affiliation; and the date on the Visible Emissions Observation Form in Section 11;
  - b. the time, estimated distance to the emissions location, sun 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 or best estimate if unknown*) on the sheet at the time opacity observations are initiated and completed;
  - c. the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;
  - d. opacity observations to the nearest five percent at 15-second intervals on the Visible Emissions Observation record in Section 11; and
  - e. the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.

- 3.2 To determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet.
- 3.3 Calculate and record the highest 6-minute and 18-consecutive-minute averages observed.
- 4. Visible Emissions Reporting.** When required by Conditions 1.2, 1.3 or 1.5, or in the event of replacement of any of EU IDs 21 – 26 and 41, the Permittee shall report visible emissions as follows:
- [18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)(iii)]
- 4.1 Include in each operating report under Condition 71 for the period covered by the report for each emission unit under the Method 9 Plan:
- a. copies of the observation results (i.e. opacity observations) for each unit that used the Method 9 Plan, except for the observations the Permittee has already supplied to the Department; and
  - b. a summary to include:
    - (i) number of days observations were made;
    - (ii) highest six-minute average observed; and
    - (iii) dates when one or more observed six-minute averages were greater than 20 percent; and
  - c. a summary of any monitoring or recordkeeping required under Conditions 2 and 3 that was not done;
- 4.2 Report under Condition 70:
- a. the results of Method 9 observations that exceed an average of 20 percent opacity for any six-minute period; and
  - b. if any monitoring under Condition 2 was not performed when required, report within three days of the date the monitoring was required.

*For Flares (EU IDs 29 – 32 and 34 – 37)*

- 5. Visible Emissions Monitoring, Recordkeeping, and Reporting.** The Permittee shall observe one daylight flare event<sup>3</sup> within 12 months after the preceding flare event observation or within 12 months after the permit effective date, whichever is later. When flare events are intermittent (i.e. typically no more than once per year), then the Permittee shall observe the next daylight flare event immediately following 12-months after the preceding observation or immediately following 12 months after the permit effective date, whichever is later.

5.1 Monitor flare events using Method 9.

5.2 Record the following information for observed events:

- a. the flare(s) EU ID number;
- b. results of the Method-9 observations;
- c. reason(s) for flaring;
- d. date, beginning and ending time of event; and
- e. volume of gas flared.

5.3 Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available. If monitoring of a flare event is postponed for any of the reasons described in this condition, the Permittee shall include in the next operating report required by Condition 71 an explanation of the reason the event was not monitored.

5.4 Attach copies of the records required by Condition 5.2 with the operating report required by Condition 71 for the period required by that report.

5.5 Report under Condition 70 whenever the visible emission standard in Condition 1 is exceeded or the monitoring required under Condition 5 is not completed.

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 60.13; 40 C.F.R. 71.6(a)(3) & (c)(6)]

## **Particulate Matter Emissions Standards**

- 6. Industrial Process and Fuel-Burning Equipment Particulate Matter.** The Permittee shall not cause or allow particulate matter emitted from EU IDs 1, 2, 5 – 8, 12 – 26, 29 – 32, 34 – 37, 41, and 42 listed in Table A to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.040(j); 18 AAC 50.055(b)(1); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]

<sup>3</sup> For purposes of this permit, a “flare event” is flaring of gas at a rate that exceeds the source’s de minimis pilot, purge, and assists gas rates for a minimum of 18 consecutive minutes. It does not include non-scheduled release operations, i.e. process upsets, emergency flaring, or de-minimis venting of gas incidental to normal operations.

- 6.1 For EU IDs 1, 2, 5 – 8, and 12 – 20, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 71 indicating whether each of these emission units fired only gas during the period covered by the report. Report under Condition 70 if any fuel is burned other than gas.
- 6.2 For EU IDs 21 – 24, as long as each emission unit does not exceed the applicable rolling 12-month operating time limit in Condition 13, monitoring shall consist of an annual compliance certification under Condition 72 with the particulate matter standard in accordance with Condition 19.4. Otherwise, monitor, record, and report in accordance with Conditions 7 through 8 for the remainder of the permit term.
- 6.3 For EU IDs 25 and 26, monitor, record, and report in accordance with Conditions 7 through 8.
- 6.4 For EU IDs 29 – 32 and 34 – 37, the Permittee must annually certify compliance under Condition 72 with the particulate matter standard.
- 6.5 For EU IDs 41, if emissions are considered insignificant by operating no more than 800 hours<sup>4</sup> per 12-month rolling period, monitoring shall consist of an annual compliance certification under Condition 72 with the particulate matter standard in accordance with Condition 19.4. Otherwise, monitor, record and report visible emissions in accordance with Conditions 7 through 8 for the duration of the permit term.
- 6.6 For EU ID 42, monitoring shall consist of an annual compliance certification under Condition 72 with the particulate matter standard in accordance with Condition 19.4.

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)]

### **Particulate Matter Monitoring, Recordkeeping and Reporting**

*For Liquid Fuel-Fired Engines (EU IDs 21 – 26 and 41)*

- 7. Particulate Matter Monitoring for Diesel Engines and Turbines.** The Permittee shall conduct source tests on diesel engines, EU IDs 21 – 24 (if required under Condition 6.2) EU IDs 25 and 26, and EU ID 41 (if required under Condition 6.5) to determine the concentration of particulate matter (PM) in the exhaust, as follows:

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)(i)]

- 7.1 Except as provided for in Condition 7.4, within six months of exceeding the criteria of Condition 7.2a or 7.2b, either
  - a. conduct a PM source test according to requirements set out in 55.1; or

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<sup>4</sup> The significant thresholds under 18 AAC 50.326(e) are triggered if EU ID 41 exceeds 800 operational hours on a 12-month rolling basis.

- b. make repairs so that emissions no longer exceed the criteria of Condition 7.2; to show that emissions are below those criteria, observe emissions as described in Condition 2.1 under load conditions comparable to those when the criteria were exceeded.
- 7.2 Conduct the PM source test or make repairs according to Condition 7.1 if
  - a. 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent; or
  - b. for an emission unit with an exhaust stack diameter that is less than 18 inches, 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity that is greater than 15 percent and not more than 20 percent, unless the Department has waived this requirement in writing.
- 7.3 During each one-hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.
- 7.4 The automatic PM source test requirement in Conditions 7.1 and 7.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM standard during this permit term.
- 8. Particulate Matter Reporting for Diesel Engines and Turbines.** The Permittee shall report as follows:

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.346(c)]  
[40 C.F.R. 71.6(a)(3)(iii)]

  - 8.1 Report under Condition 70:
    - a. the results of any PM source test that exceed the PM emissions limit; or
    - b. if one of the criteria of Condition 7.2 was exceeded and the Permittee did not comply with either Condition 7.1a or 7.1b, this must be reported by the day following the day compliance with Condition 7.1 was required.
  - 8.2 Report under Condition 70 observations in excess of the thresholds of Conditions 7.2a or 7.2b within 30 days of the end of the month in which the observations occur.
  - 8.3 In each operating report under Condition 71, include for the period required by the report:
    - a. the dates, EU ID(s), and results when an observed 18-minute average was greater than an applicable threshold in Condition 7.2;
    - b. a summary of the results of any PM testing under Condition 7; and
    - c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of Condition 7.2, if they were not already submitted.

## **Sulfur Compound Emission Standards**

- 9. Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from EU IDs 1, 2, 5 – 8, 12 – 26, 29 – 32, 34 – 37, 41 and 42 to exceed 500 ppm averaged over three hours.

[18 AAC 50.040(j); 18 AAC 50.055(c); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]

## **Sulfur Compound Emissions Monitoring, Recordkeeping and Reporting**

### *For Fuel Gas<sup>5</sup>-Fired Emission Units (EU IDs 1, 2, 5 – 8, and 12 – 20)*

- 9.1 For EU IDs 6 – 8, to ensure compliance with Condition 9, the Permittee shall comply with the fuel sulfur content limits as required by Condition 11<sup>6</sup>.

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- 9.2 The Permittee shall analyze a representative sample of the fuel gas burned by gas-fired emission units at the production center and of the fuel gas burned by gas-fired heaters at each drill site monthly to determine the total sulfur and H<sub>2</sub>S content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

- 9.3 Keep records of the sulfur content analysis required under Condition 9.2.

- 9.4 The Permittee shall report as follows:

- a. Include copies of the records required by Condition 9.3 with the operating report required by Condition 71 for the period covered by the report.
- b. Report as excess emissions, in accordance with Condition 70, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 9.

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(a)(3) & (c)(6)]

### *For North Slope Liquid Fuel (EU IDs 21 – 26, 41 and 42)*

- 9.5 For liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plant the results of a monthly fuel sulfur analysis.
- 9.6 The Permittee shall include in the operating report required by Condition 71, a list of the sulfur content measured for each month covered by the report.

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<sup>5</sup> Fuel gas, as the term is used in the context of this condition, is described generally by the definition of natural gas found in 40 C.F.R. 60.41b, effective 10/08/09.

<sup>6</sup> For EU IDs 6 -8, compliance with the fuel gas hydrogen sulfide limit of Condition 11 will assure compliance with the 500-ppm SO<sub>2</sub> emission limit of Condition 9.

- 9.7 Report as excess emissions, in accordance with Condition 70, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 9. When reporting under this condition, include the calculated SO<sub>2</sub> emissions in ppm using Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).

[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3)(iii)]

*For Other Fuel Oil<sup>7</sup> (EU IDs 21 – 26, 41 and 42)*

- 9.8 The Permittee shall do one of the following for each shipment of fuel:
- a. If the fuel grade requires a sulfur content less than 0.50 percent by weight, keep receipts that specify the fuel grade and the amount received; or
  - b. If the fuel grade does not require a sulfur content less than 0.50 percent by weight, keep receipts that specify the fuel grade and the amount received, and
    - (i) test the fuel for sulfur content using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1); or
    - (ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
- 9.9 The Permittee shall report as follows:
- a. Report in each operating report required by Condition 71, all records obtained under Condition 9.8.
  - b. Report as excess emissions, in accordance with Condition 70, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 9. When reporting under this condition, include the calculated SO<sub>2</sub> emissions in ppm using Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(a)(3) & (c)(6)]

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<sup>7</sup> Oil as the term is used in the context of this condition is described generally as crude oil or petroleum or a liquid fuel derived from crude oil or petroleum, including distillate and residual oil, as defined in 40 C.F.R. 60.41b, effective 10/08/09.

## Pre-Construction<sup>8</sup> Permit Requirements

### *Owner Requested Limits to Avoid HAP Major Classification*

**10. Firing Rate Requirements, EU IDs 12 and 13.** The Permittee shall limit the firing rate of EU IDs 12 and 13 to no greater than 181.5 MMBtu/hr, each individually.

10.1 Using the fuel consumption values determined in Condition 16 calculate and record on a monthly basis the firing rate for EU IDs 12 and 13 in MMBtu/hr.

10.2 Report in the operating report required by Condition 71, the firing rate calculated for each heater according Condition 10.1 for each month during the reporting period.

10.3 Report in accordance with Condition 70, whenever operation of a heater exceeds the limit in Condition 10.

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

### *Owner Requested Limits to Avoid Prevention of Significant Deterioration (PSD) Major Modification and Protect Ambient Air Quality*

**11. Fuel Gas H<sub>2</sub>S Requirements, EU IDs 6 – 8.** The Permittee shall not burn fuel gas in EU IDs 6 – 8 with a hydrogen sulfide content (H<sub>2</sub>S) that exceeds 25 ppmv at standard conditions, annual average. Upon completion<sup>9</sup> of a Department approved air quality modeling, the Permittee may apply for a permit modification to change this limit as approved.

11.1 Monitor and record the fuel gas H<sub>2</sub>S content according to Conditions 9.2 and 9.3.

11.2 Report in the operating report required by Condition 71, the consecutive 12-month period average fuel gas H<sub>2</sub>S concentration for each month of the reporting period:

11.3 Report in accordance with Condition 70 any time the 12-month period average fuel gas H<sub>2</sub>S concentration exceeds the limit in Condition 11.

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

**12. Flue Gas Monitoring for Heaters, EU IDs 12 and 13.** The Permittee shall monitor flue gas carbon monoxide and oxygen for EU IDs 12 and 13 while operating in the fresh air mode. Monitoring is not required during startup<sup>10</sup>.

<sup>8</sup> *Pre-Construction* refers to permits issued pursuant to regulations approved or promulgated through rulemaking under Title I of the Act, including State and Federal PSD permits and State-issued Permits-to-Operate (prior to January 17, 1997), construction permits issued effective January 17, 1997 or later, and minor permits issued effective October 1, 2004 or later.

<sup>9</sup> Completion means the Department approval date, or if approved through a Title I permit decision, the effective date of that permit.

<sup>10</sup> For purposes of this permit *startup* for the Econotherm heaters, EU IDs 12 and 13, means the time from initial firing of the unit until normal operating condition is achieved but is never to exceed three hours of operation.



- 12.1 Monitoring shall be conducted in accordance with the Department approved monitoring plan proposed by the Permittee on July 31, 1985.
- 12.2 Continuously record the carbon monoxide (CO) and oxygen (O<sub>2</sub>) concentration of the flue gas measured in accordance with Condition 12.1. In addition, record the heater firing rate for each CO and O<sub>2</sub> measurement. CO readings may be used to develop current fresh air mode emission factors for Section 13.
- 12.3 Submit copies of the records required by Condition 12.2 for the period covered by the report with the operating report required by Condition 71.

[Operating/Construction Permit No. AQ0182TVP01, Revision 2, 8/26/05]  
[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3) & (c)(6)]

- 13. Operational Hour Limits, EU IDs 12, 13, and 21 – 26.** The Permittee shall limit the hours of operation for EU IDs 12 and 13 (combined), and for EU IDs 21 – 26 (each) during each consecutive 12-month period as indicated in Table B below.

**Table B – Operating Hour Limits**

EU ID(s)	Make/Model	Equipment Tag Number	Operating Hour Consecutive 12-month Limits
12 & 13	Econotherm Heaters	H-51-8002A H-51-8002B	8,900 hours combined total Note -- During fresh-air firing mode; with the fuel flow valve in automatic operation.
21 – 26	Caterpillar Generators	GNED-01-0001 GNED-01-0002	200 hours per unit
	Detroit Generators/Pump	GNED -01-0011 PED-01-7004 GNED-51-8001A	
	Allison Generator	GTRB-51-8001	

- 13.1 Monitor and record the monthly operating hours for each of EU IDs 12, 13, and 21 – 26 per this condition and Condition 15.
- 13.2 Report using the operating report required by Condition 71, the monthly and consecutive 12-month period summation of hours of operation for EU IDs 12 and 13 (combined) and for each of EU IDs 21 – 26 for each month of the reporting period.
- 13.3 Notify the Department in accordance with Condition 70 whenever an emission unit is operated beyond any limit in Table B.

[Operating/Construction Permit No. AQ0182TVP01, Revision 2, 8/26/05]  
[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

- 14. Heater and Reboiler NO<sub>x</sub> and CO Owner Requested Limits, EU IDs 12, 13, and 20.** The Permittee shall avoid classification as a Prevention of Significant Deterioration major modification for NO<sub>x</sub> and CO by ensuring compliance with the owner requested limits in Table C below.

**Table C – Heater Owner Requested Limits<sup>1</sup>**

Pollutant	EU ID	Make/Model	Tag Number	Emission Limit (short-term) per Individual Unit	Annual Emission Limit
<b>NO<sub>x</sub></b>	12 & 13	Econotherm Heaters	H-51-8002A H-51-8002B	No Limit	71.4 TPY combined total <sup>2</sup>
	20	Smith Reboiler	B-01-9920	0.08 lb/MMBtu (at 4% excess O <sub>2</sub> )	No Limit
<b>CO</b>	12 & 13	Econotherm Heaters	H-51-8002A H-51-8002B	60 ppmvd (Fresh Air Mode Firing)	145.1 TPY combined total (Fresh Air Mode Firing)
	20	Smith Reboiler	B-01-9920	0.018 lb/MMBtu	No Limit

Notes:

- (1) All emission limits refer to full load, standard conditions.
- (2) The annual NO<sub>x</sub> and CO emissions limits for EU IDs 12 and 13 (combined totals) are based on the firing rate limit under Condition 10 and the annual operating hour limit under Condition 12. These more stringent ADEC limits superseded the EPA BACT ton per year limits.
- (3) The short-term CO emission limit for EU IDs 12 and 13 superseded the EPA BACT limit.

14.1 To ensure compliance with the PSD avoidance limits, the Permittee shall:

- (i) Within 12 months of the effective date of this permit, and within every five years thereafter, conduct a NO<sub>x</sub> and CO emission source test on EU ID 12, 13, and 20 in accordance with Section 6 to ensure compliance with the short-term BACT NO<sub>x</sub> and CO emission limits in Table C. If a unit has not operated during the first 12 months of the effective date of this permit, test the unit within thirty days after operation resumes. Conduct tests at no less than four loads representative of the unit's typical operating range unless that typical operating range is less than 10 percent of the duty rating. For a unit with a typical operating range less than 10 percent, test at the highest typical operating load of the unit. In the source test report, also report the firing rate (load) for each run and the emissions rate for each run expressed in lb/MMBtu. For unit 20, also provide the NO<sub>x</sub> emission rate corrected to 4% O<sub>2</sub>.
- b. For EU IDs 12 and 13, monitor, record, and report CO emissions in accordance with Condition 12 to ensure compliance with short-term CO emission limit in Table C.
- c. For annual limit compliance, calculate and record the monthly and the consecutive 12-month summation of emissions of NO<sub>x</sub> and CO for EU IDs 12 and 13 using the fuel-specific emission factors found in Section 13 of this permit, along with the hours of operation and/or amount of fuel used as monitored under Conditions 15 and/or 16.

- d. Report the monthly and the consecutive 12-month period summation of NO<sub>x</sub> and CO emissions from Condition 14.1b, for each month of the reporting period with each operating report required by Condition 71.
- e. Report in accordance with Condition 70 should the emissions of any air pollutant exceed the emission limit for that pollutant in Table C.

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

**15. Operational Hour Monitoring, EU IDs 1, 2, 5 – 8, and 12 – 26.** The Permittee shall monitor, record and report the hours of operation as follows:

15.1 Monitor and record the monthly operating time for each of EU IDs 1, 2, 5 – 8, and 12 – 26.

- a. For each of EU IDs 21 – 26, record the monthly and consecutive 12-month total hours of operation (total of emergency and non-emergency hours).

15.2 Report using the operating report under Condition 71, the data recorded under Condition 15.1 for each month of the reporting period.

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

**16. Fuel Consumption Monitoring, EU IDs 1, 2, 5 – 8, 12 – 26, 29 – 32, and 34 – 37.** The Permittee shall monitor the monthly fuel consumption for EU IDs 1, 2, 5 – 8, 12 – 26, 29 – 32, and 34 – 37 as emission unit group totals as follows:

16.1 For Group I turbines (EU IDs 1, 2, and 5 – 8), maintain and operate a monitoring device (e.g., fuel gas meter) to measure the total volume of fuel gas consumed by EU IDs 1, 2, and 5 – 8 combined.

16.2 For Groups II, III, and IV emission units (EU IDs 12 – 37), the total volume of fuel consumed by each emission unit group may be estimated using recorded operating hours or flaring periods.

16.3 Monitor and record the monthly fuel consumption for each of the fuel-fired emission unit groups (Groups I – IV of Table A) and the stationary source-wide totals for each fuel type.

16.4 Report using the operating report under Condition 71, the total quantity and type of fuel burned in each emission unit group (Groups I – IV of Table A), and the total quantity of fuel burned at the stationary source (MMscf per month for fuel gas-fired emission units and gallons per month for liquid fuel-fired emission units).

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

*Best Available Control Technology (BACT) Limits*

**17. Turbine BACT Limits, EU IDs 1, 2, and 5 – 8.** The Permittee shall limit actual emissions from EU IDs 1, 2, and 5 – 8 as indicated in Table D below.

**Table D – Turbine BACT Limits**

Pollutant	EU ID	Make/Model	Tag Number	Emission Limit (short-term) per Individual Unit	Annual Emission Limit per Individual Turbine (TPY)
<b>NO<sub>x</sub></b>	1 & 2	GE Turbines	GTRB-01-7000 GTRB-01-7001	173 ppmvd @ 15% O <sub>2</sub>	1,115
	5 & 6	Cooper Rolls Turbines	GTRB-51-3204 GTRB-51-3304	213 ppmvd at 15% O <sub>2</sub> , ISO	999
	7 & 8	Sulzer Turbines	GTRB-01-7704A GTRB-01-7704B	169 ppmvd at 15% O <sub>2</sub>	230
<b>CO</b>	1 & 2	GE Turbines	GTRB-01-7000 GTRB-01-7001	0.17 lb/MMBtu for each unit	269
	5 & 6	Cooper Rolls Turbines	GTRB-51-3204 GTRB-51-3304		193
	7 & 8	Sulzer Turbines	GTRB-01-7704A GTRB-01-7704B		56
<b>PM &amp; Opacity</b>	1 & 2	GE Turbines	GTRB-01-7000 GTRB-01-7001	0.014 lb/MMBtu & 10% averaged over any six consecutive minutes	22
	5	Cooper Rolls Turbine	GTRB-51-3204		16
	6	Cooper Rolls Turbine	GTRB-51-3304	10% averaged over any six consecutive minutes	16
	7 & 8	Sulzer Turbines	GTRB-01-7704A GTRB-01-7704B		4.6
<b>SO<sub>2</sub></b>	5	Cooper Turbine	GTRB-51-3204	No BACT Limit	No BACT Limit
	6	Cooper Turbine	GTRB-51-3304		5.0
	7 & 8	Sulzer Turbines	GTRB-01-7704A GTRB-01-7704B		1.5

17.1 To ensure compliance with the turbine short-term emission limits:

- a. For EU IDs 1, 2, and 5 – 8, monitor, record, and report as follows to ensure compliance with the short-term BACT NO<sub>x</sub>, CO, and PM emission limits in Table D:

- (i) Conduct NO<sub>x</sub> emission source tests on EU IDs 1, 2, and 5 – 8 in accordance with Conditions 29.1 through 29.3 to demonstrate compliance with the short-term turbine BACT NO<sub>x</sub> emission limits in Table D and to develop current emission factors for Section 13. Conduct tests at no less than four loads representative of each turbine's typical operating range unless that operating range is less than 10 percent of the rated capacity. In that instance, test at the highest typical operating load of the turbine(s). Provide within the source test report NO<sub>x</sub> emissions in ppmv at 15% O<sub>2</sub>, lb/MMBtu of fuel gas burned, and lb/hour for each load.
  - (ii) Within 12 months of the effective date of this permit and within every five years thereafter, conduct CO (on EU IDs 1, 2, and 5 – 8) and PM (on EU IDs 1, 2, and 5) emission source tests in accordance with Section 6 to ensure compliance with the short-term turbine BACT CO and PM emission limits in Table D and to develop current emission factors for Section 13. Conduct tests at no less than four loads representative of each turbine's typical operating range unless that operating range is less than 10 percent of the rated capacity. In that instance, test at the highest typical operating load of the turbine(s). Substituting test data is allowed if the Permittee documents the intent to substitute testing for multiple turbines and meets all other requirements of Conditions 29.1b(i) through 29.1b(iii). The source test report shall provide CO and PM emissions in lb/MMBtu and lb/hour for each load.
- b. For EU IDs 1, 2, and 5 – 8, conduct annual visible emission observations, the first to be completed within 12 months of the effective date of this permit to demonstrate compliance with the short-term turbine BACT Opacity limit in Table D. The observations shall be conducted as specified by 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.
  - (i) Conduct subsequent visible emission observations within twelve months after the preceding observation.
  - (ii) Record and report as required under Conditions 3.1 and 4.1 except report results compared to the 10 percent opacity limit, instead of 20 percent opacity, under Condition 4.1b(iii).
- c. Report in accordance with Condition 70 should the emissions of any air pollutant exceed the short-term emission limit for that pollutant in Table D.

17.2 To ensure compliance with the turbine annual emission limits:

- a. Calculate and record the monthly and the consecutive 12-month summation of emissions of NO<sub>x</sub>, CO, PM, and SO<sub>2</sub> for EU IDs 1, 2, and 5 – 8 to ensure compliance with the annual emission limits in Table D, as follows:
  - (i) For NO<sub>x</sub>, PM, and CO emissions, use the emission factors found in Section 13 of this permit, along with the hours of operation and/or amount of fuel used as determined in Condition 15 and/or 16 to calculate the monthly emission rates for each unit.
  - (ii) For SO<sub>2</sub> emissions, calculate and record the monthly and consecutive 12-month rolling total SO<sub>2</sub> emission rates using a mass balance equation with the quantity of fuel burned and the maximum representative total sulfur content of fuel gas as measured in Conditions 9.2 and 30.
- b. Report the monthly and the consecutive 12-month summation of NO<sub>x</sub>, CO, PM, and SO<sub>2</sub> emissions for EU IDs 1, 2, and 5 – 8 for each month of the reporting period within each operating report required by Condition 71.
- c. Notify the Department under Condition 70 when the consecutive 12-month summation of emissions of any air pollutant for a given turbine exceeds the annual emission limit for that pollutant in Table D.

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[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

**18. Heater BACT Limits, EU IDs 12 and 13.** The Permittee shall limit actual emissions from EU IDs 12 and 13 as indicated in Table E below.

**Table E – Heater BACT Limits**

Pollutant	EU ID	Make/Model	Tag Number	Emission Limit (short-term) per Individual Unit	Annual Emission Limit per Individual Turbine (TPY)
NO <sub>x</sub>	12 & 13	Econotherm Heaters	H-51-8002A H-51-8002B	0.08 lb/MMBtu	No BACT Limit
PM & Opacity	12 & 13	Econotherm Heaters	H-51-8002A H-51-8002B	5%, consecutive 6-minute average	No BACT Limit

Notes:

- (1) The annual NO<sub>x</sub> and CO and short-term CO BACT emission limits were superseded by more stringent owner requested limits in Condition 14.

18.1 To ensure compliance with the heater short-term emission limits:

- a. For EU IDs 12 and 13, monitor, record, and report as follows to ensure compliance with the short-term BACT NO<sub>x</sub> emission limit in Table E:
  - (i) Within 12 months of the effective date of this permit and within every five years thereafter, conduct NO<sub>x</sub> emission source tests in accordance with Section 6; and to develop current emission factors for Section 13. The tests shall be conducted at no less than four loads representative of each heater's typical operating range unless that typical operating range is less than 10 percent of the rated capacity. In that instance, test at the highest typical operating load of the unit. Provide within the source test report NO<sub>x</sub> emissions in lb/MMBtu and lb/hour for each load.
  - (ii) For each emissions source test, develop fuel specific emission factors using the higher heat value of the fuel for use in Section 13. For units of the same make, model, and configuration, one unit within the group can be tested.
- b. For EU IDs 12 and 13, conduct annual visible emission observations, the first to be completed within 12 months of the effective date of this permit to demonstrate compliance with the short-term heater BACT opacity limit in Table E. The observations shall be conducted as specified by 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.
  - (i) Conduct subsequent visible emission observations within twelve months after the preceding observation.
  - (ii) Record and report as required under Conditions 3.1 and 4.1 except report results compared to the 5 percent opacity limit, instead of 20 percent opacity, under Condition 4.1b(iii).
- c. Report in accordance with Condition 70 should emissions of any air pollutant exceed the short-term emission limit for that pollutant in Table E.

[Operating/Construction Permit No. AQ0182TVP01 Rev. 2, 8/26/05]  
[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3) & (c)(6)]

### Insignificant Emission Units

19. For EU IDs 21 – 24, 41, and 42<sup>11</sup>, and other emission units at the stationary source that are insignificant as defined in 18 AAC 50.326(d)-(i) that are not listed in this permit, the following apply:

19.1 **VE Standard:** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from an industrial process or fuel-burning equipment to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

[18 AAC 50.055(a)(1)]

19.2 **PM Standard:** The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.055(b)(1)]

19.3 **Sulfur Standard:** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.

[18 AAC 50.055(c)]

#### 19.4 **General MR&R for Insignificant Emission Units**

- a. The Permittee shall submit the certification of compliance of Condition 72 based on reasonable inquiry;
- b. The Permittee shall comply with the requirements of Condition 53;
- c. The Permittee shall report in the operating report required by Condition 71 if an emission unit is insignificant because of historical actual emissions less than the thresholds of 18 AAC 50.326(e) and current actual emissions become greater than any of those thresholds; and
- d. No other monitoring, recordkeeping or reporting is required except as indicated otherwise within the permit.

[18 AAC 50.346(b)(4)]

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<sup>11</sup> EU IDs 21 – 24, 41 and 42 do not qualify as insignificant units per 18 AAC 50.326(d)(1) because the units are subject to operational limits established under a Title I permit and NESHAP Subpart ZZZZ requirements, but have actual and potential emissions below the significant emissions thresholds in 18 AAC 50.326(e) based on the 200-hour per unit operational limit required in Condition 13 for EU IDs 21 – 24, 800 hours for EU ID 41, and unlimited operational hours for EU ID 42. The Department referenced the general requirements for insignificant emission units to satisfy the State VE and PM MR&R requirements for these units.



## ***Section 4. Federal Requirements***

### **Emission Units Subject to Federal NSPS, Subpart A**

- 20. NSPS Subpart A Startup, Shutdown, & Malfunction Requirements.** The Permittee shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of EU IDs 1, 2, 5 – 8, 20, 26, 38, 39, and 40 any malfunctions of associated air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for EU IDs 1, 2, 5 – 8, 20, 26, 38, 39, or 40 is inoperative.

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.7(b), Subpart A]

- 21. NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report.** Except as provided for in Condition 22, the Permittee shall submit to the Department and to EPA a written "excess emissions and monitoring systems performance report" (EEMSP)<sup>12, 13</sup> as described in this condition for EU IDs 1, 2, 5 – 8, and 26. Except as provided for in Condition 30.4, submit the EEMSP reports to EPA semi-annually, postmarked by the 30<sup>th</sup> day following the end of each six-month period. Written reports of excess emissions shall include the following information:

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.7(c), Subpart A]  
[40 C.F.R. 60.334(j), Subpart GG]

- 21.1 The magnitude of excess emissions computed in accordance with 40 C.F.R. 60.13(h), any conversion factors used, the date and time of commencement and completion of each time period of excess emissions, and the process operating time during the reporting period.

[40 C.F.R. 60.7(c)(1) and 60.13(h), Subpart A, 7/1/07]

- 21.2 Specific identification of each period of excess emissions that occurred during startup, shutdown, and malfunction of EU IDs 1, 2, 5 – 8, and 26; the nature and cause of any malfunction (if known), and the corrective action taken or preventative measures adopted.

[40 C.F.R. 60.7(c)(2), Subpart A]

- 21.3 When no excess emissions have occurred, such information shall be stated in the report.

[40 C.F.R. 60.7(c)(4), Subpart A]

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<sup>12</sup> The federal EEMSP report is not the same as the State excess emission report required by Condition 70.

<sup>13</sup> Periods of excess emissions and monitor downtime for units subject to the NSPS Subpart GG SO<sub>2</sub> limit (EU IDs 1, 2, 5 – 8, and 26) are defined in 40 C.F.R. 60.334(j)(2).

- 22. NSPS Subpart A Summary Report Form.** The Permittee shall submit to the Department and to EPA one "summary report form" in the format shown in Figure 1 of 40 C.F.R. 60.7<sup>14</sup> for each pollutant monitored for EU IDs 1, 2, 5 – 8, and 26. Except as provided for in Condition 30.4 the report shall be submitted semiannually, postmarked by the 30<sup>th</sup> day following the end of each 6-month period, as follows:

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.7(c) & (d), Subpart A]

- 22.1 If the total duration of excess emissions for the reporting period is less than one percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than five percent of the total operating time for the reporting period, submit only the summary report form **unless** the EEMSP report described in Condition 21 is requested by the Department or EPA; or

[40 C.F.R. 60.7(d)(1), Subpart A]

- 22.2 If the total duration of excess emissions for the reporting period is one percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is five percent or greater of the total operating time for the reporting period, then submit a summary report form **and the EEMSP** described in Condition 21.

[40 C.F.R. 60.7(d)(2), Subpart A, 7/1/07]

- 23. NSPS Subpart A Performance (Source) Tests.** The Permittee shall conduct source tests according to the applicable requirements of 40 C.F.R. 60.8 and Section 6 on any affected facility at such times as may be required by EPA, and shall provide the Department and EPA with a written report of the results of the source test.

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.8(a), Subpart A]

- 24. NSPS Subpart A Good Air Pollution Control Practice.** At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate EU IDs 1, 2, 5 – 8, 20, 26, 38, 39, and 40 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance records, and inspections of EU IDs 1, 2, 5 – 8, 20, 26, 38, 39, and 40.

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.11(d), Subpart A]

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<sup>14</sup> See Summary Report form in Attachment A of the Statement of Basis.

- 25. NSPS Subpart A Credible Evidence.** For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of the standards set forth in Conditions 27 through 30, nothing in 40 C.F.R. Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU IDs 1, 2, 5 – 8, 20, 26, 38, 39, and 40 would have been in compliance with applicable requirements of 40 C.F.R. 60 if the appropriate performance or compliance test or procedure had been performed.

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.11(g), Subpart A]

- 26. NSPS Subpart A Concealment of Emissions.** The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 27 through 30. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.12, Subpart A]

#### **Steam Generating Units Subject to NSPS Subpart Dc, EU ID 20**

- 27. NSPS Subpart Dc Fuel Consumption.** For EU ID 20, the Permittee shall record and maintain records of the amount of each fuel combusted during each operating day; or monitor according to an EPA approved custom fuel-monitoring schedule.

- 27.1 As an alternative to meeting the requirements of Condition 27, the Permittee may elect to record the amount of each fuel combusted during each calendar month.
- 27.2 Maintain records required for a period of two years following the date of such record.

[18 AAC 50.040(a)(2)(D)]  
[40 C.F.R. 60.48c(g)(1 & 2) & (i), Subpart Dc]

#### **Storage Tanks Subject to NSPS Subpart Ka, EU IDs 38 – 40**

- 28. NSPS Subpart Ka Applicability.** Subpart Ka applies to sources that were built or modified after May 18, 1978 and prior to July 23, 1984. EU IDs 38 – 40 were constructed during this time frame, have a storage capacity greater than 40,000 gallons, and store petroleum liquids.

- 28.1 The Permittee shall not store in EU IDs 39 and 40 a petroleum liquid with a true vapor pressure greater than 1.0 psia without first taking measures to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable. Monitoring shall consist of an annual certification that the Permittee stored only Arctic Heating Fuel, Diesel Fuel, or Jet A in EU IDs 39 and 40, or if other materials are stored in EU IDs 39 and 40 that the true vapor pressure of the material stored is 1.0 psia or less.

[18 AAC 50.040(a)(2)(L)]  
[40 C.F.R. 60.115a(d)(1), Subpart Ka]

- 28.2 The Permittee shall maintain and operate EU ID 38 with a vapor recovery system meeting the specifications of 40 C.F.R. 60.112a(a)(3) and in accordance with the Operations and Maintenance Plan developed in compliance with 40 C.F.R. 60.113a(a)(2)(iii).

[18 AAC 50.040(a)(2)(L)]  
[40 C.F.R. 60.112a(a)(3), Subpart Ka]

**Turbines Subject to NSPS Subpart GG, EU IDs 1, 2, 5 – 8, and 26<sup>15</sup>**

- 29. NSPS Subpart GG NO<sub>x</sub> Standard.** The Permittee shall not allow the exhaust gas concentration of NO<sub>x</sub> to exceed 173 ppmvd at 15 percent O<sub>2</sub>, ISO corrected, from EU IDs 1 and 2; 213 ppmvd at 15 percent O<sub>2</sub>, ISO corrected, from EU IDs 5 and 6; and 169 ppmvd at 15 percent O<sub>2</sub>, ISO corrected, from EU IDs 7 and 8.

[18 AAC 50.040(a)(2)(V)]  
[40 C.F.R. 60.332(a)(2) & (d), Subpart GG]

- 29.1 **Monitoring.** The Permittee shall comply with the following:

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(a)(3)(i) & (c)(6)]

- a. **Periodic Testing.** For each turbine subject to Conditions 29 and/or 17, the Permittee shall satisfy either Conditions 29.1a(i) or 29.1a(ii).
- (i) For existing turbines whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the applicable limits shown in Conditions 29 and 17, the Permittee shall conduct a NO<sub>x</sub> and O<sub>2</sub> source test under 40 C.F.R. 60, Appendix A, Method 20, or Method 7E and either Method 3 or 3A:
    - (A) Within 1 year of the effective date of this permit if the last source test occurred greater than four years prior to the effective date of this permit and the turbine operated 400 hours or more in any 12-month period (trigger event) within 6 months before the permit effective date, or
    - (B) Within 1 year after exceeding 400 hours of operation in a 12-month period if the last source test occurred greater than 4 years prior to the trigger event at any time during the permit term.
  - (ii) For existing turbines whose latest emissions source testing was certified as operating at greater than 90 percent of the applicable limits shown in Conditions 29 and 17, the Permittee shall conduct a NO<sub>x</sub> and O<sub>2</sub> source test under 40 C.F.R. 60, Appendix A-7, Method 20, or Method 7E and either Method 3 or 3A annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the applicable limits of Conditions 29 and/or 17.

<sup>15</sup> EU ID 26 is an emergency gas turbine exempt from NSPS Subpart GG NO<sub>x</sub> requirements per 40 C.F.R. 60.332(g). [40 C.F.R. 60.332(g): *Emergency gas turbines, military gas turbines for use in other than a garrison facility, military gas turbines installed for use as military training facilities, and fire fighting gas turbines are exempt from 40 C.F.R. 60.332(a) (Subpart GG NO<sub>x</sub> standard).*]

- b. **Substituting Test Data.** The Permittee may use a Method 20, or Method 7E and either Method 3 or 3A test under Condition 29.1a performed on only one of a group of similarly configured turbines to satisfy the requirements of those conditions for the other turbines in the group if
- (i) The Permittee demonstrates that test results are less than or equal to 90 percent of the applicable emission limits of Conditions 29 and/or 17, and are projected under Condition 29.1c to be less than or equal to 90 percent of the applicable limits at maximum load;
  - (ii) For any source test done after the effective date of this permit, the Permittee identifies in a source test plan under Condition 62
    - (A) the turbine to be tested;
    - (B) the other turbines in the group that are to be represented by the test; and
    - (C) why the turbine to be tested is representative, including that each turbine in the group
      - (1) is located at a stationary source operated and maintained by the Permittee;
      - (2) operates under close to identical ambient conditions as the untested turbines;
      - (3) is the same make and model and has identical injectors and combustor;
      - (4) uses the same fuel type from the same supply origin.
  - (iii) The Permittee may not use substitute test results to represent emissions from a turbine or group of turbines if that turbine or group of turbines is operating at greater than 90 percent of the applicable emission limits of Conditions 29 and 17.
- c. **Load.** The Permittee shall comply with the following:
- (i) Conduct all tests under Condition 29.1 in accordance with 40 C.F.R. 60.335(b)(2), except as otherwise approved in writing by the Department, or by EPA if the circumstances at the time of the EPA approval are still valid. For the highest load condition, if it is not possible to operate the turbine during the test at maximum load, the Permittee will test the turbine when operating at the highest load achievable by the turbine under the ambient and stationary source operating conditions in effect at the time of the test.
  - (ii) Demonstrate in the source test plan for any test performed after the issue date of this permit whether the test is scheduled when maximum NOx emissions are expected.

- (iii) If the highest operating rate tested is less than the maximum load of the tested turbine or another turbine represented by the test data,
  - (A) for each such turbine the Permittee shall provide to the Department as an attachment to the source test report
    - (1) additional test information from the manufacturer or from previous testing of units in the group of turbines; if using previous testing of the group of turbines, the information must include all available test data for the turbines in the group, and
    - (2) a demonstration based on the additional test information that projects the test results from Condition 29.1 to predict the highest load at which emissions will comply with the applicable limits in Condition 29 and Condition 17;
  - (B) the Permittee shall not operate any turbine represented by the test data at loads for which the Permittee's demonstration predicts that emissions will exceed any of the applicable emission limits of Condition 29 and Condition 17;
  - (C) the Permittee shall comply with a written finding prepared by the Department that
    - (1) the information is inadequate for the Department to reasonably conclude that compliance is assured at any load greater than the test load, and that the Permittee must not exceed the test load;
    - (2) the highest load at which the information is adequate for the Department to reasonably conclude that compliance assured is less than maximum load, and the Permittee must not exceed the highest load at which compliance is predicted, or
    - (3) the Permittee must retest during a period of greater expected demand on the turbine; and
  - (D) the Permittee may revise a load limit by submitting results of a more recent Method 20, or Method 7E and either Method 3 or 3A test done at a higher load, and, if necessary, the accompanying information and demonstration described in Condition 29.1c(iii)(A); the new limit is subject to any new Department finding under Condition 29.1c(iii)(C).
- (iv) In order to perform a Method 20, or Method 7E and either Method 3 or 3A emission test, the Permittee may operate a turbine at a higher load than that prescribed by Condition 29.1c(iii).

- (v) For the purposes of Conditions 29.1 through 29.3, maximum load means the hourly average load that is the smallest of
  - (A) 100 percent of manufacturer's design capacity of the gas turbine at ISO standard day conditions;
  - (B) the highest load allowed by an enforceable condition that applies to the turbine; or
  - (C) the highest load possible considering permanent physical restraints on the turbine or the equipment which it powers.

**29.2 Recordkeeping.** The Permittee shall keep records as follows:

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(a)(3)(ii) & (c)(6)]

- a. The Permittee shall comply with the following for each turbine for which a demonstration under Condition 29.1c(iii) does not show compliance with any of the applicable emission limits of Condition 29 and Condition 17 at maximum load.
  - (i) The Permittee shall keep records of
    - (A) load; or
    - (B) as approved by the Department, surrogate measurements for load and the method for calculating load from those measurements.
  - (ii) Records in Condition 29.2a shall be hourly or otherwise as approved by the Department.
  - (iii) Within one month after submitting a demonstration under Condition 29.1c(iii)(A)(2) that predicts that the highest load at which emissions will comply is less than maximum load, or within one month of a Department finding under Condition 29.1c(iii)(C), whichever is earlier, the Permittee shall propose to the Department how they will measure load or load surrogates, and shall propose and comply with a schedule for installing any necessary equipment and beginning monitoring. The Permittee shall comply with any subsequent Department direction on the load monitoring methods, equipment, or schedule.
- b. For any turbine subject to Condition 29 and/or Condition 17 that will operate less than 400 hours in any 12 consecutive months, the Permittee shall keep monthly records of the hours of operation.

**29.3 Reporting.** The Permittee shall report as follows:

[18 AAC 50.040(j); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(a)(3)(iii) & (c)(6)]

- a. In each operating report under Condition 71, the Permittee shall list for each turbine tested or represented by testing at less than maximum load and for which the Permittee must limit load under Condition 29.1c(iii)
  - (i) the load limit;
  - (ii) the turbine identification; and
  - (iii) the highest load recorded under Condition 29.2a during the period covered by the operating report.
- b. In each operating report under Condition 71 for each turbine for which Condition 29.1 has not been satisfied because the turbine normally operates less than 400 hours in any 12 consecutive months, the Permittee shall identify
  - (i) the turbine;
  - (ii) the highest number of operating hours for any 12 consecutive months ending during the period covered by the report; and
  - (iii) any turbine that operated for 400 or more hours.
- c. The Permittee shall report under Condition 70 if
  - (i) a test result exceeds the emission standard;
  - (ii) Method 20, or Method 7E and either Method 3 or 3A testing is required under Condition 29.1a(i) or 29.1a(ii) but not performed, or
  - (iii) the turbine was operated at a load exceeding that allowed by Conditions 29.1c(iii)(B) and 29.1c(iii)(C); exceeding a load limit is deemed a single violation rather than a multiple violation of both monitoring and the underlying emission limit.

[18 AAC 50.220(a) - (c); 18 AAC 50.040(a)(1)]  
[40 C.F.R. 60.8(b), Subpart A]

**30. NSPS Subpart GG Sulfur Standard.** The Permittee shall not allow the sulfur content for the fuel burned in EU IDs 1, 2, 5 – 8, and 26 to exceed 0.8 percent by weight.

[18 AAC 50.040(a)(2)(V)]  
[40 C.F.R. 60.333(b), Subpart GG]

**30.1 Monitoring.** The Permittee shall monitor compliance with the standard listed in this condition as follows:

[18 AAC 50.040(a)(2)(V)]  
[40 C.F.R. 60.334 & 60.335, Subpart GG]



- a. Monitor the total sulfur content of the fuel being fired in the turbine, except as provided in Condition 30.1b and 30.1c. The sulfur content of the fuel must be determined using total sulfur methods described in Conditions 30.2a or 30.2b. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4,000 ppmw), ASTM D4084–82, 94, D5504–01, D6228–98, or Gas Processors Association Standard 2377–86, which measure the major sulfur compounds may be used.

[40 C.F.R. 60.334(h)(1), Subpart GG]

- b. Notwithstanding the provisions of Conditions 30.1a and 30.1c, and upon submittal of a certified statement to the Department that, pursuant to 40 C.F.R. 60.334(h)(3), the gaseous fuel is demonstrated to meet the definition of natural gas in 40 C.F.R. 60.331(u)<sup>16</sup>, the Permittee may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine regardless of whether an existing custom schedule approved by the Administrator requires such monitoring. The Permittee shall use one of the following sources of information to make the required demonstration:

- (i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
- (ii) Representative fuel sampling data, which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount of fuel sampling data specified in 40 C.F.R. 75, Appendix D, Section 2.3.1.4 or 2.3.2.4 is required.

[40 C.F.R. 60.334(h)(3), Subpart GG]

- c. For any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and for which a custom fuel monitoring schedule has previously been approved, the Permittee may, without submitting a special petition to the Administrator, continue monitoring on this schedule. The EPA-approved Custom Fuel Monitoring Schedule (5/8/96 and 8/19/96) and Alternate H<sub>2</sub>S Sampling Method (10/2/97) allow the Permittee to determine the fuel sulfur content of the fuel gas at least monthly using ASTM D 4810-88, ASTM D 4913-89, or Gas Producer's Association (GPA) Method 2377-86.

[40 C.F.R. 60.334(h)(4), Subpart GG]

[Alternative Monitoring Plan, 10/2/97]

[Custom Fuel Monitoring Schedules, 5/8/96 and 8/19/96]

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<sup>16</sup> From 40 C.F.R. 60.331(u), *natural gas* contains 20.0 grains or less of total sulfur per 100 standard cubic feet. Equivalents of this in other units are as follows: 0.068 weight percent total sulfur, 680 ppmw total sulfur, and 338 ppmv at 20 degrees Celsius total sulfur. Additionally, natural gas must either be composed of at least 70 percent methane by volume or have a gross calorific value between 950 and 1100 Btu/scf.

d. The frequency of determining the sulfur content of the fuel shall be as follows:

- (i) **Fuel oil.** For fuel oil, use one of the total sulfur sampling options and the associated sampling frequency described in Sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of Appendix D to 40 C.F.R. 75 (i.e., flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with fuel oil already in the intended storage tank). If an emission allowance is being claimed for fuel-bound nitrogen, the nitrogen content of the oil shall be determined and recorded once per unit operating day.
- (ii) **Gaseous fuel.** If the Permittee elects not to demonstrate sulfur content using options in Condition 30.1b or 30.1c, and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined under Condition 30.1a and recorded once per unit operating day.
- (iii) **Custom schedules.** Notwithstanding the requirements of Condition 30.1d(i), the Permittee may develop a custom schedule for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply, according to the provisions and as allowed under 40 C.F.R. 60.334(i)(3). The two custom sulfur monitoring schedules set forth in 40 C.F.R. 60.334(i)(3)(i)(A) through (D) and 60.334(i)(3)(ii) are acceptable without prior Administrative approval.

[40 C.F.R. 60.334(i), Subpart GG]

[Custom Fuel Monitoring Schedule, 5/8/96 & 8/19/96]

[Alternative Monitoring Plan, 10/2/97]

**30.2 Test Methods and Procedures.** If the Permittee periodically determines the sulfur content of the fuel combusted in the turbine under Conditions 30.1a, 30.1d(i), or 30.1d(ii), a minimum of three fuel samples shall be collected during the performance test. Analyze the samples for the total sulfur content of the fuel using:

[18 AAC 50.040(a)(2)(V)]

[40 C.F.R. 60.335(b)(10), Subpart GG]

- a. **For liquid fuels,** ASTM D129-00, D2622-98, D4294-02, D1266-98, D5453-00 or D1552-01 (all of which are incorporated by reference, see 40 C.F.R. 60.17).
- b. **For gaseous fuels,** ASTM D1072-80, 90; D3246-81, 92, 96; D4468-85; or D6667-01. The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the prior approval of the Administrator.

[40 C.F.R. 60.335(b)(10)(ii), Subpart GG]

- c. The fuel analyses required under Conditions 30.1 and 30.2 may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[40 C.F.R. 60.335(b)(11), Subpart GG]

**30.3 Recordkeeping.** Keep records of the analyses conducted under Conditions 30.1 and 30.2.

[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3)(ii)]

**30.4 Reporting.** The Permittee shall

- a. For each affected unit for which the Permittee periodically determines the fuel sulfur content under Conditions 30.1a, 30.1c, or 30.1d,
  - (i) Report the results of all liquid fuel sulfur monitoring to EPA and send a copy to the Department by the 30th day following the end of each 6-month period as required under 40 C.F.R. 60.334(j)(5) and 40 C.F.R. 60.7(c), or at a different frequency in accordance with a custom fuel monitoring schedule for liquid fuel approved by the EPA.
  - (ii) Annually report the results of all gaseous fuel sulfur monitoring to EPA and send a copy to the Department by the 30<sup>th</sup> day following the end of each 12-month period; and
  - (iii) Include with the reports submitted under Conditions 30.4a(i) and 30.4a(ii) a report of excess emissions and monitoring system downtime in accordance with 40 C.F.R. 60.7(c) as summarized in Condition 21 and as defined under 40 C.F.R. 60.334(j)(2). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction.
  - (iv) If periodic gaseous fuel sulfur monitoring is not required to be conducted because the demonstration under Condition 30.1b has been made, gaseous fuel sulfur reporting under Conditions 21, 22, and this Condition 30.4 is not required. (Liquid fuel sulfur reporting does not include this same exclusion.)

[Custom Fuel Monitoring Schedule, 5/8/96 & 8/19/96]

[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 60.334(j), Subpart GG]

- b. Include a copy of the records required by Condition 30.3 with the operating report required by Condition 71 for the period covered by the report; and
- c. Report under Condition 70 if
  - (i) a test result exceeds the limit in Condition 30;
  - (ii) monitoring is required under Condition 30.1 but not performed; or

- (iii) any reporting required under Condition 30.4 is not completed.

[18 AAC 50.040(j) & 50.326(j)]  
[40 C.F.R. 71.6(a)(3) & (c)(6)]

### **National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart A**

- 31. NESHAPs Subpart A and ZZZZ Requirements.** Beginning no later than May 3, 2013, the Permittee shall comply with the applicable requirements of 40 C.F.R. 63 Subpart A in accordance with the provisions for applicability of Subpart A in Table 8 to Subpart ZZZZ.

[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]  
[40 C.F.R. 63.6665 & Table 8, Subpart ZZZZ]  
[40 C.F.R. 63.1-63.15, Subpart A]

### **Stationary Reciprocating Internal Combustion Engines (RICE) Subject to NESHAPs Subpart ZZZZ, EU IDs 21 – 25, 41, and 42**

- 32. NESHAPs Subpart ZZZZ Work Practice Standards and General Maintenance Requirements.** For EU IDs 21 – 25, 41, and 42 listed in Table A, the Permittee shall comply with the following requirements no later than May 3, 2013.

[18 AAC 50.040(c)(23) & (j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]  
[40 C.F.R. 63.6590(a)(1)(iii), Subpart ZZZZ]

- 32.1 At all times operate and maintain EU IDs 21 – 25, 41, and 42, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of EU IDs 21 – 25, 41, and 42. The Permittee shall comply with either:

- a. the manufacturer's emission-related written operation and maintenance instructions; or
- b. a maintenance plan developed by the Permittee which must provide, to the extent practicable, for the maintenance and operation of the engine(s) in a manner consistent with good air pollution control practice for minimizing emissions.

[40 C.F.R. 63.6605(b), 63.6625(e)(3), and Table 6 item 9, Subpart ZZZZ]

- 32.2 For EU IDs 21 – 25, 41, and 42, minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 C.F.R. 63.6625(h), Subpart ZZZZ]

- 33. NESHAP Subpart ZZZZ Management Practice Standards.** For EU IDs 21 – 25 (existing emergency stationary CI RICE), EU ID 41 (non-emergency black start stationary CI RICE), and EU ID 42 (non-emergency CI RICE < 300 Hp) located at an area source of HAP emissions listed in Table A, the Permittee shall comply with the following management practice standards no later than May 3, 2013.

[40 C.F.R. 63.6595(a)(1), Subpart ZZZZ]

- 33.1 For EU IDs 21 – 25 and 41, except as allowed by Condition 33.3 for EU IDs 21 – 25,

- a. Change oil and filter every 500 hours of operation or annually, whichever comes first<sup>17</sup>.
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 C.F.R. 63.6603(a), 63.6625(i), & Table 2d, item 4, Subpart ZZZZ]

- 33.2 For EU ID 42, the Permittee shall comply with the following:

- a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first<sup>18</sup>;
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and
- c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 C.F.R. 63.6603(a), 63.6625(i), & Table 2d, item 1, Subpart ZZZZ]

- 33.3 If any of EU IDs 21 – 25 is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required under Condition 33.1, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice required by Condition 33.1 should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

[40 C.F. R. 63, Footnote 2 to Table 2d, Subpart ZZZZ]

<sup>17</sup> The Permittee has the option to utilize an oil analysis program as described in 40 C.F.R. 63.6625(i) in order to extend the specified oil change requirement in Condition 33.1a. [ref. Table 2d, Footnote 1 and 40 C.F.R. 63.6625(i)]

<sup>18</sup> The Permittee has the option to utilize an oil analysis program as described in 40 C.F.R. 63.6625(i) in order to extend the specified oil change requirement in Condition 33.2a. [ref. Table 2d, Footnote 1 and 40 C.F.R. 63.6625(i)]

**34. NESHAP Subpart ZZZZ Monitoring.** For existing emergency stationary CI RICE, EU IDs 21 – 25, the Permittee shall comply with the following no later than May 3, 2013:

[18 AAC 50.040(c)(23) & (j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(c)(3)(i)]

34.1 Install a non-resettable hour meter if one is not already installed. Monitor the operating time of EU IDs 21 – 25 using a non-resettable hour meter.

[40 C.F.R. 63.6625(f), Subpart ZZZZ]

34.2 To be classified as an emergency stationary engine, EU IDs 21 – 25 must be operated according to the requirements of Conditions 34.2a through 34.2d.

- a. Any operation of EU IDs 21 – 25 other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per calendar year, as described in Condition 34.2c, and operation in non-emergency situations for 50 hours per calendar year, as described in Condition 34.2d, is prohibited. If the engine is not operated according to the requirements in Conditions 34.2b through 34.2d, the engine will not be considered an emergency engine under this subpart and will need to meet all applicable requirements for non-emergency engines.
- b. There is no time limit on the use of emergency stationary RICE in emergency situations.
- c. The Permittee may operate the emission units for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units is limited to 100 hours per calendar year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- d. The Permittee may operate the emission units up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 C.F.R. 63.6640(f)(1), Subpart ZZZZ]

**35. NESHAP Subpart ZZZZ Recordkeeping.** For each of EU IDs 21 – 25, 41, and 42, beginning May 3, 2013, the Permittee shall keep the following records:

[18 AAC 50.040(c)(23) & (j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(c)(3)(iii)]

- 35.1 Records of the maintenance conducted on each engine in order to demonstrate that the units and after-treatment control device (if any) are operated and maintained according to the Permittee's own maintenance plan, if maintenance is performed as allowed under Condition 32.1b. These records must include at a minimum: oil and filter change dates and corresponding hour on the hour meter; inspection and replacement dates for air cleaners, hoses, and belts; and records of other emission-related repairs and maintenance performed; and

[40 C.F.R. 63.6655(e)(2 & 3) , Subpart ZZZZ]

- 35.2 Records of the hours of operation of each of EU IDs 21 – 23 and 25 including:

- a. The number of hours spent for emergency operation, including what classified the operation as emergency; and
- b. The calendar-year total number of hours spent for non-emergency operation.

[40 C.F.R. 63.6655(f)(2), Subpart ZZZZ]

- 35.3 Keep records in a form suitable and readily available for expeditious inspection and review, readily accessible in hard copy or electronic form, and for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site.

[40 C.F.R. 63.6660, 63.6665, and Table 8, Subpart ZZZZ]

[40 C.F.R. 63.10(b)(1), Subpart A]

- 36. NESHAP Subpart ZZZZ Reporting.** For EU IDs 21 – 25, 41, and 42, no later than May 3, 2013, the Permittee shall:

[18 AAC 50.040(c)(23) & (j); 18 AAC 50.326(j)]

[40 C.F.R. 71.6(c)(3)(ii)]

- 36.1 Report under Condition 71 any failure to perform the management practice on the schedule required in Condition 33.1. Include in the report the emergency and/or the Federal, State or local law under which the risk of performing the management practice on the required schedule was deemed unacceptable (see Condition 33.3).

[40 C.F. R. 63, Footnote 2 of Table 2d, Subpart ZZZZ]

- 36.2 Include in the operating report required by Condition 71 a report of Subpart ZZZZ deviations as defined in 40 C.F.R. 63.6675 and of each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A (Table 8 of Subpart ZZZZ) was not met; and

[40 C.F.R. 63.6640(e), & 63.6650(f), Subpart ZZZZ]

- 36.3 Notify the Department in accordance with Condition 70 if any of the requirements in Conditions 31 through 36 were not met.

[18 AAC 50.326(j)(4)]

[40 C.F.R. 71.6(a)(3)(iii) & (c)(6)]

- 37. Asbestos NESHAP.** The Permittee shall comply with the applicable requirements set forth in 40 C.F.R. 61.145 and 40 C.F.R. 61.150 of Subpart M, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.

[18 AAC 50.040(b)(1) & (2)(F); 18 AAC 50.326(j)]  
[40 C.F.R. 61, Subparts A & M, & Appendix A]

- 38. Refrigerant Recycling and Disposal.** The Permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F. Applicable requirements include 40 C.F.R. 82.154, 82.156, 82.161, 82.162, and 82.166.

[18 AAC 50.040(d); 18 AAC 50.326(j)]  
[40 C.F.R. 82, Subpart F]

- 39. NESHAPs Applicability Determinations.** The Permittee shall determine rule applicability and designation of affected sources under National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories (40 C.F.R. 63) in accordance with the procedures described in 40 C.F.R. 63.1(b). If a source becomes affected by an applicable subpart of 40 C.F.R. 63, the Permittee shall comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 C.F.R. 63.6(c).

[18 AAC 50.040(c)(1) & 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3)(ii)]  
[40 C.F.R. 63.1(b) and 63.6(c)(1), Subpart A]

- 40. NSPS and NESHAP Reports.** The Permittee shall:

**40.1 Reports:** Attach to the operating report required by Condition 71, a copy of any NSPS and NESHAPs reports submitted to the EPA-Region 10 during the period covered by the operating report; and

**40.2 Waivers:** Upon request by the Department, provide a written copy of any EPA-granted alternative monitoring requirement, custom monitoring schedule, or waiver of the federal emission standards, recordkeeping, monitoring, performance testing, or reporting requirements. The Permittee shall keep a copy of each EPA-issued monitoring waiver or custom monitoring schedule with the permit.

[18 AAC 50.326(j)(4) & 50.040(j)]

## **Halon Prohibitions, 40 C.F.R. 82**

- 41.** The Permittee shall comply with the applicable prohibitions set out in 40 C.F.R. 82.174(b) – (d) (Protection of Stratospheric Ozone Subpart G – Significant New Alternatives Policy Program).

[18 AAC 50.040(d)]  
[40 C.F.R. 82.174 (b) - (d)]

- 42.** The Permittee shall comply with the applicable prohibitions set out in 40 C.F.R. 82.270(b) – (f) (Protection of Stratospheric Ozone Subpart H – Halon Emission Reduction).

[18 AAC 50.040(d)]  
[40 C.F.R. 82.270 (b)-(f)]  
[40 C.F.R. 60.13, 63.10(d and f), and 71.6(c)(6)]



## ***Section 5. General Conditions***

### **Standard Terms and Conditions**

- 43.** 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 AAC 50.326(j)(3); 18 AAC 50.345(a) & (e)]

- 44.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and re-issuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.326(j)(3); 18 AAC 50.345(a) & (f)]

- 45.** The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.326(j)(3); 18 AAC 50.345(a) & (g)]

- 46. Administration Fees.** The Permittee shall pay to the Department all assessed permit administration fees. Administration fee rates are set out in 18 AAC 50.400-405.

[18 AAC 50.326(j)(1); 18 AAC 50.400; 18 AAC 50.403; 18 AAC 50.405]  
[AS 37.10.052(b), 11/04; AS 46.14.240]

- 47. Assessable Emissions.** 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 assessable emission fee rate is set out in 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 greater than 10 tons per year (TPY). The quantity for which fees will be assessed is the lesser of

47.1 the stationary source's assessable potential to emit of 6,540 TPY; or

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

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

[18 AAC 50.040(j)(3), 50.035, 50.326(j)(1), 50.346(b)(1), 50.410, & 50.420]  
[40 C.F.R. 71.5(c)(3)(ii)]

**48. Assessable Emission Estimates.** Emission fees will be assessed as follows:

48.1 no later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Suite 303, Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or

48.2 if no estimate 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 set forth in Condition 47.1.

[18 AAC 50.040(j)(3); 18 AAC 50.326(j)(1); 18 AAC 50.346(b)(1); 18 AAC 50.410; 18 AAC 50.420]  
[40 C.F.R. 71.5(c)(3)(ii)]

**49. Good Air Pollution Control Practice.** Except as noted in Condition 49.4, the Permittee shall do the following for EU IDs 12 – 19, 21 – 26, 29 – 31, 34 – 37, 41, and 42:

49.1 perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;

49.2 keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and

49.3 keep a copy of either the manufacturer's or the operator's maintenance procedures.

49.4 EU IDs 21 – 25, 41, and 42 are subject to this condition only until the compliance date as set forth in Condition 32.

[18 AAC 50.030; 18 AAC 50.326(j)(3); 18 AAC 50.346(b)(5)]

**50. Dilution.** The Permittee shall not dilute emissions with air to comply with this permit. Monitoring shall consist of an annual certification that the Permittee does not dilute emissions to comply with this permit.

[18 AAC 50.045(a)]

**51. Reasonable Precautions to Prevent Fugitive Dust.** A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air. Monitoring shall consist of an annual certification that reasonable precautions were taken.

[18 AAC 50.045(d); 18 AAC 50.040(e); 18 AAC 50.326(j)(3); 18 AAC 50.346(c)]

**52. Stack Injection.** The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a stationary source constructed or modified after November 1, 1982, except as authorized by a construction permit, Title V permit, or air quality control permit issued before October 1, 2004. Monitoring shall consist of an annual certification that the Permittee does not conduct stack injection at the stationary source.

[18 AAC 50.055(g)]

**53. Air Pollution Prohibited.** No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.

[18 AAC 50.110; 18 AAC 50.040(e); 18 AAC 50.326(j)(3); 18 AAC 50.346(a)]  
[40 C.F.R. 71.6(a)(3)]

- 53.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 70.
- 53.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 53.
- 53.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
  - a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of Condition 53; or
  - b. the Department notifies the Permittee that it has found a violation of Condition 53.
- 53.4 The Permittee shall keep records of
  - a. the date, time, and nature of all emissions complaints received;
  - b. the name of the person or persons that complained, if known;
  - c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 53; and
  - d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.
- 53.5 With each operating report required under Condition 71 and for the period covered by the report, the Permittee shall include a brief summary report which must include:
  - a. the number of complaints received;
  - b. the number of times the Permittee or the Department found corrective action necessary;
  - c. the number of times action was taken on a complaint within 24 hours; and
  - d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.

53.6 The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

- 54. Technology-Based Emission Standard.** If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235(d), causes emissions in excess of a technology-based emission standard<sup>19</sup> listed in Conditions 17, 18, 29, or 30, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting under Condition 70 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under Condition 70.

[18 AAC 50.235(a); 18 AAC 50.040(j)(4); 18 AAC 50.326(j)(4)]  
[40 C.F.R. 71.6(c)(6)]

### Open Burning

- 55. Open Burning.** If the Permittee conducts open burning at this stationary source, the Permittee shall comply with the requirements of 18 AAC 50.065.

55.1 The Permittee shall keep written records to demonstrate that the Permittee complies with the limitations in this condition and the requirements of 18 AAC 50.065. Upon request by the Department, submit copies of the records.

55.2 Compliance with this condition shall be an annual certification conducted under Condition 72.

[18 AAC 50.065; 18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3)]

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<sup>19</sup> *Technology-based emission standard* means a best available control technology standard (BACT); a lowest achievable emission rate standard (LAER); a maximum achievable control technology standard established under 40 C.F.R. 63, Subpart B, adopted by reference in 18 AAC 50.040(c); a standard adopted by reference in 18 AAC 50.040(a) or (c); and any other similar standard for which the stringency of the standard is based on determinations of what is technologically feasible, considering relevant factors. Such other standards might include those found in 40 C.F.R. 82, Protection of Stratospheric Ozone.

## ***Section 6. General Source Testing and Monitoring Requirements***

- 56. Requested Source Tests.** In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a); 18 AAC 50.345(a) & (k)]

- 57. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing

[18 AAC 50.220(b)]

57.1 at a point or points that characterize the actual discharge into the ambient air; and

57.2 at the maximum rated burning or operating capacity of the emission unit or another rate determined by the Department to characterize the actual discharge into the ambient air.

- 58. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:

58.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60.

[18 AAC 50.220(c)(1)(A); 18 AAC 50.040(a)]  
[40 C.F.R. 60]

58.2 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. 63.

[18 AAC 50.040(c); 18 AAC 50.220(c)(1)(C)]  
[40 C.F.R. 63]

58.3 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9. The Permittee may use the form in Section 11 to record data.

[18 AAC 50.030; 18 AAC 50.220(c)(1)(D),

58.4 Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.

[18 AAC 50.040(a)(3); 18 AAC 50.220(c)(1)(E)]  
[40 C.F.R. 60, Appendix A]

58.5 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Methods 201 or 201A and 202.

[18 AAC 50.035(b)(2); 18 AAC 50.220(c)(1)(F)]  
[40 C.F.R. 51, Appendix M]

58.6 Source testing for emissions of any pollutant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63, Appendix A, Method 301.

[18 AAC 50.040(c)(24); 18 AAC 50.220(c)(2)]  
[40 C.F.R. 63, Appendix A Method 301]

**59. Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific emission unit type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).

[18 AAC 50.220(c)(3); 18 AAC 50.990(102)]

**60. Test Exemption.** The Permittee is not required to comply with Conditions 62, 63 and 64 when the exhaust is observed for visible emissions using the Method 9 Plan (Condition 2.1).

[18 AAC 50.345(a)]

**61. Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.

[18 AAC 50.345(a) & (l)]

**62. Test Plans.** Except as provided in Condition 60, before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the emission unit will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under Condition 56 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be performed without resubmitting the plan.

[18 AAC 50.345(a) & (m)]

**63. Test Notification.** Except as provided in Condition 60, at least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.

[18 AAC 50.345(a) & (n)]

**64. Test Reports.** Except as provided in Condition 60, within 60 days after completing a source test, the Permittee shall submit two copies of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in Condition 67. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.

[18 AAC 50.345(a) & (o)]

- 65. Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in Conditions 6 and 19.2, the three-hour average is determined using the average of three one-hour test runs.

[18 AAC 50.220]

## ***Section 7. General Recordkeeping and Reporting Requirements***

### **Recordkeeping Requirements**

- 66. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:

[18 AAC 50.040(a)(1); 18 AAC 50.326(j)]

[40 C.F.R. 60.7(f), Subpart A; 40 C.F.R. 71.6(a)(3)(ii)(B)]

- 66.1 copies of all reports and certifications submitted pursuant to this section of the permit; and
- 66.2 records of all monitoring required by this permit, and information about the monitoring including:
  - a. the date, place, and time of sampling or measurements;
  - b. the date(s) analyses were performed;
  - c. the company or entity that performed the analyses;
  - d. the analytical techniques or methods used;
  - e. the results of such analyses; and
  - f. the operating conditions as existing at the time of sampling or measurement.

### **Reporting Requirements**

- 67. 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.

- 67.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if
  - a. a certifying authority registered under AS 09.25.510 verifies that the electronic signature is authentic; and
  - b. the person providing the electronic signature has made an agreement, with the certifying authority described in Condition 67.1a, that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.

[18 AAC 50.205 & 50.345(a) & (j); 18 AAC 50.326(j)]

[40 C.F.R. 71.6(a)(3)(iii)(A)]



- 68. Submittals.** Unless otherwise directed by the Department or this permit, the Permittee shall send an original and one copy of reports, compliance certifications, and other submittals required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician. The Permittee may, upon consultation with the Compliance Technician regarding software compatibility, provide electronic copies of data reports, source test reports, or other records under a cover letter certified in accordance with Condition 67.

[18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(3)(iii)(A)]

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

[18 AAC 50.345(a) & (i); 18 AAC 50.200; 18 AAC 50.326(a) & (j)]  
[40 C.F.R. 71.5(a)(2) & 71.6(a)(3)]

**70. Excess Emissions and Permit Deviation Reports.**

70.1 Except as provided in Condition 53, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report
  - (i) emissions that present a potential threat to human health or safety; and
  - (ii) excess emissions that the Permittee believes to be unavoidable;
- b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or non routine repair that causes emissions in excess of a technology based emission standard;
- c. report all other excess emissions and permit deviations
  - (i) within 30 days after the end of the month during which the excess emissions or deviation occurred, except as provided in Conditions 70.1c(ii) and 70.1c(iii);
  - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under Condition 70.1c(i); or
  - (iii) according to the required deadline for failure to monitor, as specified in Conditions 4.2b and 8.1b.

70.2 When reporting either excess emissions or permit deviations, the Permittee shall report using either the Department's on-line form, which can be found at <http://www.dec.state.ak.us/air/ap/site.htm> or <https://myalaska.state.ak.us/dec/air/airtoolsweb/>, or if the Permittee prefers, the form contained in Section 14 of this permit. The Permittee shall provide all information called for by the form that is used.

70.3 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2) & 50.240(c); 18 AAC 50.326(j)(3); 18 AAC 50.346(b)(2) & (3)]

**71. Operating Reports.** During the life of this permit<sup>20</sup>, the Permittee shall submit to the Department an original and one copy of an operating report by May 15 for the period January 1 to March 31, by August 15 for the period April 1 to June 30, by November 15 for the period July 1 to September 30, and by February 15 for the period October 1 to December 31 of the previous year.

[18 AAC 50.346(b)(6), 11/9/08; 18 AAC 50.326(j), 12/1/04]  
[40 C.F.R. 71.6(a)(3)(iii)(A), 7/2/07]

71.1 The operating report shall include for the period covered by the report all information required to be in operating reports by other conditions of this permit.

71.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 71.1, the Permittee shall identify

- a. the date of the deviation;
- b. the equipment involved;
- c. the permit condition affected;
- d. a description of the excess emissions or permit deviation; and
- e. any corrective action or preventive measures taken and the date(s) of such actions.

71.3 When excess emissions or permit deviations have already been reported under Condition 70, the Permittee shall cite the date or dates of those reports.

71.4 The operating report shall include for the period covered by the report a listing of emissions monitored under Conditions 2.1e, 7.2 and 29.1a, which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report:

- a. the date of the emissions;
- b. the equipment involved;

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<sup>20</sup> *Life of this permit* is defined as the permit effective dates, including any periods of reporting obligations that extend beyond the permit effective dates. For example, if a permit expires prior to the end of a calendar year, there is still a reporting obligation to provide operating reports for the periods when the permit was in effect.

- c. the permit condition affected; and
- d. the monitoring result which triggered the additional monitoring.

**71.5 Transition from Expired to Renewed Permit.** For the first period of this renewed operating permit, also provide the previous permit's operating report elements covering that partial period immediately preceding the effective date of this renewed permit.

**72. Annual Compliance Certification.** Each year by March 31, the Permittee shall compile and submit to the Department an original and one copy of an annual compliance certification report<sup>21</sup>.

**72.1** Certify the compliance status of the stationary source over the preceding calendar year consistent with the monitoring required by this permit, as follows:

- a. identify each term or condition set forth in Section 3 through Section 9, that is the basis of the certification;
- b. briefly describe each method used to determine the compliance status;
- c. state whether compliance is intermittent or continuous; and
- d. identify each deviation and take it into account in the compliance certification.

**72.2 Transition from Expired to Renewed Permit.** For the first period of this renewed operating permit, also provide the previous permit's annual compliance certification report elements covering that partial period immediately preceding the effective date of this renewed permit.

**72.3** In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

[18 AAC 50.205; 18 AAC 50.345(a) & (j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(c)(5)]

**73. Emission Inventory Reporting.** The Permittee shall submit to the Department reports of actual emissions, by emission unit, of CO, NH<sub>3</sub>, NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, VOCs and Lead (Pb) (and lead compounds) using the form in Section 15 of this permit, as follows:

**73.1** Each year by March 31, since the stationary source's potential to emit emissions for the previous calendar year exceed 2,500 TPY of NO<sub>x</sub>.

**73.2** Include in the report required by this condition, the required data elements contained within the form in Section 15 or those contained in Table 2A of Appendix A to Subpart A of 40 C.F.R. 51 (final rule published in 73 FR 76556 (December 17, 2008)) for each stack associated with an emission unit.

[18 AAC 50.346(b)(8) and 18 AAC 50.200]  
[40 C.F.R. 51.15, 51.30(a)(1) & (b)(1) and 40 C.F.R. 51,  
Appendix A to Subpart A, 73 FR 76556 (12/17/08)]

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<sup>21</sup> See Condition 72.2 for clarification on the number of reports required.

## ***Section 8. Permit Changes and Renewal***

**74. Permit Applications and Submittals.** The Permittee shall comply with the following requirements for submitting application information to the EPA-Region 10:

- 74.1 The Permittee shall provide a copy of each application for modification or renewal of this permit, including any compliance plan, or application addenda, at the time the application or addendum is submitted to the Department<sup>22</sup>;
- 74.2 The information shall be submitted to the same address as in Condition 72.3;
- 74.3 To the extent practicable, the Permittee shall provide to EPA applications in portable document format (PDF); MS Word format (.doc); or other computer-readable format compatible with EPA's national database management system; and
- 74.4 The Permittee shall maintain records as necessary to demonstrate compliance with this condition.

[18 AAC 50.040(j)(7); 18 AAC 50.326(b); 18 AAC 346(b)(7)]  
[40 C.F.R. 71.10(d)(1)]

**75. Emissions Trading.** No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.

[18 AAC 50.040(j)(4); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(8)]

**76. Off Permit Changes.** The Permittee may make changes that are not addressed or prohibited by this permit other than those subject to the requirements of 40 C.F.R. Parts 72 through 78 or those that are modifications under any provision of Title I of the Act to be made without a permit revision, provided that the following requirements are met:

[18 AAC 50.040(j)(4); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(12)]

- 76.1 Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition;
- 76.2 Provide contemporaneous written notice to EPA and the Department of each such change, except for changes that qualify as insignificant under 18 AAC 50.326(d) – (i). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change;
- 76.3 The change shall not qualify for the shield under 40 C.F.R. 71.6(f);
- 76.4 The Permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

<sup>22</sup> The documents required in Condition 74.1 are submitted to the Department's Anchorage office. The current address for the Anchorage office is: ADEC, 619 East Ship Creek Avenue, Suite 249, Anchorage, AK 99501.

**77. Operational Flexibility.** The Permittee may make changes within the permitted stationary source without requiring a permit revision if the changes are not modifications under any provision of Title I of the Act and the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions):

77.1 The Permittee shall provide EPA and the Department with a written notification no less than 7 days in advance of the proposed change.

77.2 For each such change, the written notification required by Condition 77.1 shall include a brief description of the change within the permitted stationary source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

77.3 The permit shield described in 40 C.F.R. 71.6(f) shall not apply to any change made pursuant to Condition 77.

[18 AAC 50.040(j)(4); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)(13)]

**78. Permit Renewal.** To renew this permit, the Permittee shall submit an application under 18 AAC 50.326 no sooner than **[18 months before]** and no later than **[6 months before the expiration date of this permit]**. **The renewal application shall be complete before the permit expiration date listed on the cover page of this permit.** Permit expiration terminates the stationary source's right to operate unless a timely and complete renewal application has been submitted consistent with 40 C.F.R. 71.7(b) and 71.5(a)(1)(iii).

[18 AAC 50.040(j)(3); 18 AAC 50.326(c)(2) & (j)(2)]  
[40 C.F.R. 71.5(a)(1)(iii), 71.7(b) & (c)(1)(ii)]

## ***Section 9. Compliance Requirements***

### **General Compliance Requirements**

- 79.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are

79.1 included and specifically identified in the permit; or

79.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.326(j)(3); 18 AAC 50.345(a) & (b)]  
[40 C.F.R. 71.6(f)(1)]

- 80.** The Permittee shall comply with each permit term and condition.

80.1 For applicable requirements with which the stationary source is in compliance, the Permittee shall continue to comply with such requirements.

80.2 Noncompliance with a permit term or condition constitutes a violation of AS 46.14.120(c), 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

- a. an enforcement action;
- b. permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
- c. denial of an operating permit renewal application.

[18 AAC 50.040(j); 18 AAC 50.326(j); 18 AAC 50.345(a) & (c)]  
[40 C.F.R. 71.6(c)(3) & 71.5(c)(8)(iii)(A)]

- 81.** 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.

[18 AAC 50.326(j)(3); 18 AAC 50.345(a) & (d)]

- 82.** 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

82.1 enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;

82.2 have access to and copy any records required by the permit;

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

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

[18 AAC 50.326(j)(3); 18 AAC 50.345(a) & (h)]

- 83.** For applicable requirements that will become effective during the permit term, the Permittee shall meet such requirements on a timely basis.

[18 AAC 50.040(j) & 50.326(j)]  
[40 C.F.R. 71.6(c)(3) & 71.5(c)(8)(iii)(B)]

### ***Section 10. Permit As Shield from Inapplicable Requirements***

In accordance with AS 46.14.290, and based on information supplied in the permit application, this section of the permit contains the requirements determined by the Department not to be applicable to the Gathering Center #1 (GC#1) .

**84.** Nothing in this permit shall alter or affect the following:

84.1 The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; or

84.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.

[18 AAC 50.326(j)]  
[40 C.F.R. 71.6(f)(3)(i) & (ii)]

**85.** Table F identifies the emission units that are not subject to the specified requirements at the time of permit issuance. If any of the requirements listed in Table F becomes applicable during the permit term, the Permittee shall comply with such requirements on a timely basis. The Permittee shall also provide appropriate notification and apply for a construction permit and/or an operating permit modification and/or permit amendment, as necessary.

[18 AAC 50.326(j)]  
[40 C.F.R. 71.6(f)(1)(ii)]

**Table F – Permit Shields Granted**

<b>Non Applicable Requirements</b>	<b>Reason for Non-Applicability</b>
<b>Group I – All Gas-Fired Turbines (EU IDs 1, 2, and 5 – 8)</b>	
40 C.F.R. 60 Subpart A – General Provisions §60.8(a) – Performance Test (Initial Performance Test Only) §60.7(a)(1) & (3) – Notification and Recordkeeping. (Initial Notification Only) §60.7(a)(4) – Notification and Recordkeeping	Initial Performance Tests and Notification Requirements for NSPS Subpart GG only. Obsolete requirements. Completed as required.  This requirement only applies to “existing facilities”, as defined in 40 C.F.R. 60.2.
40 C.F.R. 60 Subpart GG §60.332(a)(1) – Standards for NO <sub>x</sub>	Standard applies to Electric Utility Stationary Gas Turbines as defined in subpart. These units are not an Electric Utility Stationary Gas Turbines as defined in Subpart GG.
§60.334(a), (b), (d) – Monitoring of Operations §60.335(b)(4) – Test Methods and Procedures	Applies only to affected turbines equipped with water injection to control emissions of NO <sub>x</sub> . These units are not equipped with water injection to control emissions of NO <sub>x</sub> .
§60.334(e), (f) – Monitoring of Operations	Applies only to affected turbines that commenced construction after July 8, 2004. Emission units commenced construction prior to this date.
§60.334(g) – Monitoring of Operations	Applies only to affected turbines subject to the continuous monitoring requirements of 60.334(a), (d), or (f).
§60.334(h) (2) – Monitoring of Operations (Fuel Nitrogen Only)	BPXA has not claimed an allowance for fuel bound nitrogen to calculate the applicable NO <sub>x</sub> emission limit under §60.332.



Non Applicable Requirements	Reason for Non-Applicability
<b>Liquid-Fired Emergency Turbine (EU ID 26)</b>	
40 C.F.R. 60 Subpart A – General Provisions §60.8(a) – Performance Test  §60.7(a)(1) & (3) – Notification and Recordkeeping. (Initial Notification Only) §60.7(a)(4) – Notification and Recordkeeping	Emergency gas turbines as defined in subpart are exempt from §60.332(a) standard for nitrogen oxides [ref §60.332(g)]. Obsolete requirements. Completed as required.  This requirement only applies to “existing facilities”, as defined in 40 C.F.R. 60.2.
40 C.F.R. 60 Subpart GG §60.332(a) – Standards for NOx	Emergency gas turbines as defined in subpart are exempt from §60.332(a) standard for nitrogen oxides [ref §60.332(g)].
<b>Gas-Fired Turbines (EU IDs 3 and 4)</b>	
All Potential Requirements	Equipment are no longer in service.
<b>All Combustion Turbines (EU IDs 1, 2, 5 – 8, and 26)</b>	
40 C.F.R. 60 Subpart KKKK – Standards of Performance for Stationary Combustion Turbines	Construction, modification, or reconstruction of each turbine commenced prior to the applicability date of February 18, 2005. This shield applies for units as currently installed until modified, reconstructed or replaced.
40 C.F.R. 63 Subpart YYYY – National Emissions Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	GC#1 is not a major source of HAPs and turbines located on the North Slope of Alaska are categorically exempt from this rule, per §63.6090(b)(ii).
<b>Gas-Fired Heaters (EU IDs 12 and 13)</b>	
40 C.F.R. 60 Subpart D – Standards of Performance for Fossil Fuel-Fired Steam Generators	Units not classified as Fossil-Fuel-Fired Steam Generators, as defined in subpart.
40 C.F.R. 60 Subpart Da – Standards of Performance for Electric Utility Steam Generating Units	Units not classified as Electric Utility Steam Generating Units, as defined in subpart.
40 C.F.R. 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to effective date of subpart (6/19/84).
40 C.F.R. 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Heat input capacities above threshold (100 MMBtu/hr or less, but greater than 10 MMBtu/hr).
<b>Gas-Fired Heaters (EU IDs 14 – 20)</b>	
40 C.F.R. 60 Subpart D – Standards of Performance for Fossil Fuel-Fired Steam Generators	Heat input capacities below threshold (250 MMBtu/hr); and units not classified as Fossil-Fuel-Fired Steam Generators, as defined in subpart.
40 C.F.R. 60 Subpart Da – Standards of Performance for Electric Utility Steam Generating Units	Heat input capacities below threshold (250 MMBtu/hr); and units not classified as Electric Utility Steam Generating Units, as defined in subpart.
40 C.F.R. 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units	Heat input capacities below threshold (100 MMBtu/hr).

Non Applicable Requirements	Reason for Non-Applicability
<b>Gas-Fired Heaters (EU IDs 14 – 17)</b>	
40 C.F.R. 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Commenced construction prior to effective date of subpart (6/9/89). This shield applies only until an existing facility is replaced, reconstructed or modified.
<b>Gas-Fired Heaters (EU IDs 18 and 19)</b>	
40 C.F.R. 60 Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units	Heat input capacities below threshold (10 MMBtu/hr).
<b>Gas-Fired Heater (EU ID 20)</b>	
40 C.F.R. 60 Subpart Dc §60.42c - Standard for Sulfur Dioxide (SO <sub>2</sub> ) §60.43c - Standard for Particulate Matter (PM) §60.44c - Compliance and Performance Test Methods and Procedures for SO <sub>2</sub> §60.45c - Compliance and Performance Test Methods and Procedures for PM §60.46c - Emission Monitoring for SO <sub>2</sub> §60.47c - Emission Monitoring for PM §60.48c(a)(4)-(f) & (h) - Reporting and Recordkeeping Requirements	Standards for SO <sub>2</sub> and PM and related performance test, monitoring, and reporting requirements are not applicable for affected emission unit fired on fuel gas only.
§60.48c(a)(1) – Notifications §60.48c(a)(2)-(3) - Reporting and Recordkeeping Requirements	Obsolete requirements - completed as required. Emission unit is not subject to any requirements that limit the annual capacity factor for any fuel or mixture of fuels. Emission unit fires only fuel gas.
40 C.F.R. 60 Subpart A - General Provisions §60.7(a)(1) & (3) - Notification and Recordkeeping (Initial notification only)	Obsolete requirements - completed as required.
§60.7(a)(4) - Notification and Recordkeeping	This requirement only applies to “existing facilities”, as defined in 40 C.F.R. 60.2.
§60.7(c) & (d) - Excess Emissions Reporting  §60.8 - Performance Test	The provisions of §60.7(c) & (d) apply only to New Source Performance Standards which require the installation of a continuous monitoring system (CMS) or monitoring device, as defined in §60.2 or as required under specific NSPS subparts for periodic monitoring. The affected fuel gas fired heater is not required by Subpart Dc to install a CMS or monitoring device nor are there any applicable emission limits for the fuel gas fired heater to which “excess emissions” could apply. Standards for SO <sub>2</sub> and PM and related performance test, monitoring, and reporting requirements are not applicable for affected emission unit fired on fuel gas.

Non Applicable Requirements	Reason for Non-Applicability
<b>All Gas-Fired Heaters (EU IDs 12 – 20)</b>	
40 C.F.R. 60 Subpart DDDDD	GC#1 is not a major source of HAPs. Also, the State of Alaska has repealed its adoption of Subpart DDDDD under 18 AAC 50.040(c).
<b>All Reciprocating IC Engines (EU IDs 21 – 25)</b>	
40 C.F.R. 60 Subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	Construction, modification, or reconstruction of each IC engine commenced prior to the applicability date of July 11, 2005. Permit shield is no longer applicable upon modification, reconstruction or replacement.
<b>All Existing Engines located at an Area Source Subject to NESHAP Subpart ZZZZ, EU IDs 21 – 25 (Emergency), and EU IDs 41 &amp; 42 (Non-emergency with ratings &lt; 300Hp)</b>	
40 C.F.R. 63.6600, 40 C.F.R. 63.6601, and 40 C.F.R. 63.6602, Subpart ZZZZ - Emission Limitations	The stationary source is not a major source of HAP emissions.
40 C.F.R. 63.6610 and 40 C.F.R. 63.6611, Subpart ZZZZ – Testing and Initial Compliance Requirements	
40 C.F.R. 63, Subpart ZZZZ, Table 2b – Operating Limitations	There are no requirements in Table 2b of Subpart ZZZZ that apply to these engines because they are emergency engines and/or rated at $\leq 500$ bhp. <sup>23</sup>
40 C.F.R. 63.6604, Subpart ZZZZ - Fuel Requirements	The requirement to comply with 40 C.F.R. 80.510(b) does not apply to existing emergency engines or non-emergency engines with a site rating of $\leq 300$ bhp. Footnote 22 applies.
40 C.F.R. 63.6605(a), Subpart ZZZZ – General Compliance Requirements	Existing emergency engines and non-emergency engines with a site rating of $\leq 300$ bhp are not subject to any emissions limitations or operating limitations under Subpart ZZZZ. Footnote 23 applies.
40 C.F.R. 63.6612, Subpart ZZZZ – Testing and Initial Compliance Requirements	There are no requirements in either Table 4 or Table 5 of Subpart ZZZZ that apply to these engines because there are no applicable emission limitations per 40 C.F.R. 63.6610, §63.6611 and Table 2d of Subpart ZZZZ. <sup>24</sup>
40 C.F.R. 63.6615, Subpart ZZZZ – Subsequent Testing 40 C.F.R. 63.6620, Subpart ZZZZ – Performance Tests and Procedures	There are no performance testing requirements that apply to these engines because there are no applicable emission limitations per 40 C.F.R. 63.6610, §63.6611 and Table 2d of Subpart ZZZZ. Footnote 24 applies.
40 C.F.R. 63.6625(g), Subpart ZZZZ – Monitoring, Installation, Collection, Operation and Maintenance Requirements	This requirement does not apply to the emergency engines or non-emergency engines with a site rating of $\leq 300$ bhp. This shield applies only for as long as the engine(s) meet the definition of “emergency RICE” in 40 C.F.R. 63.6675” and the requirements in 40 C.F.R. 63.6640(f)(1). Footnote 23 applies.

<sup>23</sup> For emergency engines with ratings > 500 Hp, EU IDs 21 – 23 & 25, this shield applies only for as long as the engine(s) meet the definition of “emergency RICE” in 40 C.F.R. 63.6675 and the requirements in 40 C.F.R. 63.6640(f)(1). This shield does not apply when/if EU ID(s) 21 – 23 & 25 no longer qualify as “emergency” and thus, would be subject to the applicable provisions for “non-emergency” as provided in NESHAP Subpart ZZZZ.

<sup>24</sup> For emergency engines with ratings > 300 Hp, EU IDs 21 – 23 & 25, this shield applies only for as long as the engine(s) meet the definition of “emergency RICE” in 40 C.F.R. 63.6675 and the requirements in 40 C.F.R. 63.6640(f)(1). This shield does not apply when/if EU ID(s) 21 – 23 & 25 no longer qualify as “emergency” and thus, would be subject to the applicable provisions for “non-emergency” as provided in NESHAP Subpart ZZZZ.

Non Applicable Requirements	Reason for Non-Applicability
40 C.F.R. 63.6630, Subpart ZZZZ – Initial Compliance Demonstration	There are no performance testing requirements that apply to these engines because there are no applicable emission limitations per 40 C.F.R. 63.6610, §63.6611 and Table 2d of Subpart ZZZZ. Footnote 24 applies.
40 C.F.R. 63.6635, Monitoring to Demonstrate Continuous Compliance	These requirements apply only to CI RICE subject to emissions or operational limits. There are no emissions or operational limits that apply to these engines. Footnote 24 applies.
40 C.F.R. 63.6645, Subpart ZZZZ - Notification Requirements 40 C.F.R. 63.9, Subpart A – Notification Requirements	Per 40 C.F.R. 63.6645(a)(5), initial notification is not required for existing stationary emergency CI RICE or an existing stationary CI RICE that is not subject to any numerical emission standards. Footnote 24 applies.
40 C.F.R. 63.6640(b) and §60.6650, Subpart ZZZZ – Reporting Requirements 40 C.F.R. 63.9, Subpart A – Notification Requirements	Compliance status reporting requirements only apply to CI RICE subject to numerical emissions or operational limits. There are no emissions or operational limits that apply to these engines. Footnote 24 applies.
40 C.F.R. 63.6655(a) – (d), Subpart ZZZZ - Recordkeeping Requirements	There are no emissions or operational limits that apply to the engines and/or there are no applicable requirements in Table 6 of Subpart ZZZZ for these types of engines. Footnote 24 applies.
40 C.F.R. 63.5, Subpart A – Construction and Reconstruction	The preconstruction review requirements in this section apply to new affected sources and reconstructed affected sources that are major-emitting.  Stationary source is an area source of HAP emissions and these engines are existing engines.
40 C.F.R. 63.7, Subpart A – Performance Testing Requirements	There are no performance testing requirements apply to these emergency engines. Footnote 24 applies.
40 C.F.R. 63.8, Subpart A – Monitoring	Per 40 C.F.R. 63.6645(a)(5), these engines are not subject to the requirements of §63.8(e), (f)(4) and (f)(6). Footnote 24 applies.
<b>Existing Non-emergency Engines with ratings &lt; 300Hp located at an Area Source Subject to NESHAP Subpart ZZZZ, EU IDs 41 &amp; 42</b>	
40 C.F.R. 63.6625(f), Subpart ZZZZ – Monitoring, Installation, Collection, Operation and Maintenance Requirements for an Existing Emergency Stationary RICE	EU IDs 41 and 42 are not emergency engines.
40 C.F.R. 63.6640(f), Subpart ZZZZ – Continuous Compliance Demonstration for Emergency Stationary RICE	
40 C.F.R. 63.6655(f), Subpart ZZZZ - Recordkeeping Requirements	EU IDs 41 and 42 are not emergency engines and are not required to limit hours of operation per 40 C.F.R. 63.6640(f).
<b>All Nonroad Engines</b>	
18 AAC 50.055(a)(1) – Fuel-Burning Equipment Emission Standards: Visible Emissions 18 AAC 50.055(b)(1) – Fuel-Burning Equipment Emissions Standards: Particulate Matter 18 AAC 50.055(c) – Fuel-Burning Equipment Emissions Standards: Sulfur Compound Emissions	Nonroad (mobile) internal combustion engines are not included in the definition of fuel-burning equipment (18 AAC 50.990).
<b>Flares (EU IDs 29 – 32, 34 – 37)</b>	
40 C.F.R. 60 Subpart A – General Provisions §60.18 – General Control Device Requirements	These flares are not control devices used to comply with applicable Subparts of 40 C.F.R. 60 and 40 C.F.R. 61.

Non Applicable Requirements	Reason for Non-Applicability
<b>Flares (EU IDs 27, 28, and 33)</b>	
All Potential Requirements	Equipment are no longer in service.
<b>Storage Tanks T-01-0001, T-103, and T-104</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids 40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Commenced construction prior to effective dates of Subparts K, Ka, and Kb.
<b>Storage Tanks T-108 and T-01-0057</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids 40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Capacity less than 40,000 gallons and not storing a petroleum liquid as defined in Subpart K. Commenced construction prior to the effective dates of Subparts Ka and Kb.
<b>Storage Tank T-01-0022</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids 40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Does not contain petroleum liquids (Subpart K). Commenced construction prior to the effective dates of Subparts Ka and Kb.
<b>Storage Tanks T-02-8001</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids 40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Commenced construction after effective date of Subpart K. Capacity less than 40,000 gallons (Subpart Ka). Commenced construction prior to effective date of Subpart Kb.
<b>Storage Tanks T-51-8003</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids 40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Commenced construction after effective date of Subpart K. Not storing a petroleum liquid as defined in Subpart Ka. Commenced construction prior to effective date of Subpart Kb.

Non Applicable Requirements	Reason for Non-Applicability
<b>Storage Tank T-51-8002</b>	
40 C.F.R. 60 Subparts K and Ka - Standards of Performance for Storage Vessels of Petroleum Liquids	Commenced construction after effective date of Subpart K.
40 C.F.R. 60 Subpart Kb – Standards of Performance for Storage Vessels for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels)	Storage prior to custody transfer (Subpart Ka). Commenced construction prior to effective date of Subpart Kb The shield for Subpart Kb is effective only until the storage tank is modified, replaced or reconstructed.
<b>Storage Tank (EU ID 38)</b>	
40 C.F.R. 60 Subpart Ka §60.115a – Monitoring of Operations	Storage vessel equipped with a vapor recovery return or disposal system in accordance with the requirements of §60.112a(a)(3) is exempt from §60.115a - Monitoring of operations [ref. §60.115a(d)(2)].
40 C.F.R. 60 Subpart A §60.8 – Performance Tests	There are no performance test requirements for closed vent systems.
40 C.F.R. 60 Subpart Ka §60.113a(a)(2)(iii) – Testing and Procedures	Obsolete requirement – completed as required. BPXA submitted an O&M plan to EPA for tank Tag No. T-01-7703 on July 26, 1995.
40 C.F.R. 60 Subpart A – General Provisions §60.18 – General Control Device Requirements	Emission unit is affected by NSPS Subpart Ka. 40 C.F.R. 60.18 only applies to “facilities covered by subparts referring to this section” [ref. §60.18(a)]; Subpart Ka does not reference §60.18.
<b>Storage Tanks (EU IDs 38 – 40)</b>	
40 C.F.R. 60 Subpart Ka 40 C.F.R. 60 Subpart A – General Provisions §60.7(a)(1) & (3) – Notification and Recordkeeping. (Initial notification only)	Obsolete requirements – completed as required.
§60.7(a)(4) – Notification and Recordkeeping	This requirement only applies to “existing facilities”, as defined in 40 C.F.R. 60.2. This shield pertains only to affected emission units as applied to Subpart Ka.
§60.7(c) & (d) – Notification and Recordkeeping	The provisions of §60.7(c) & (d) apply only to New Source Performance Standards which require the installation of a continuous monitoring system (CMS) or monitoring device, as defined in §60.2; BPX is not required to install a CMS or monitoring device per Subpart Ka.
40 C.F.R. 60 Subpart K	Vessels commenced construction after effective date of subpart (5/19/78).
40 C.F.R. 60 Subpart Kb	Vessels commenced construction prior to effective date of subpart (7/23/84) and was not modified, replaced or reconstructed during the affected facility applicability dates.

Non Applicable Requirements	Reason for Non-Applicability	
Storage Tank (EU ID 39 and 40)		
40 C.F.R. 60 Subpart Ka §60.112a – Standard for Volatile Organic Compounds (VOC)	TVP of petroleum liquid stored below §60.112a thresholds for equipment standards (1.5 psia) and §60.115a thresholds for monitoring of operations (1.0 psia). This shield applies only for storage of petroleum liquids below the equipment standard and monitoring thresholds.	
§60.113a – Testing and procedures §60.8 – Performance Tests §60.114a – Alternative means of emission limitation §60.115a – Monitoring of operations		
Stationary Source-Wide		
40 C.F.R. 60 Subpart J – Standards of Performance for Petroleum Refineries 40 C.F.R. 60 Subpart GGG – Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries 40 C.F.R. 60 Subpart QQQ – Standards of Performance for VOC Emissions from Petroleum Refinery Wastewater Systems		Stationary source does not meet the definition for a petroleum refinery.
40 C.F.R. 60 Subpart KKK – Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	Stationary source is not a natural gas processing plant as defined in subpart.	
40 C.F.R. 60 Subpart LLL – Standards of Performance for Onshore Natural Gas Processing Plants	Stationary source does not operate natural gas sweetening unit(s).	
40 C.F.R. 61 Subpart J – National Emission Standard for Equipment Leaks (Fugitive Emission Sources) of Benzene	No process components in benzene service, as defined by subpart (10 percent benzene by weight).	
40 C.F.R. 61 Subpart M – National Emission Standard for Asbestos §61.142 – Standard for Asbestos Mills	Stationary source is not an Asbestos Mill.	
§61.143 – Standard for Roadways	Stationary source roadways not exposed to asbestos tailings or asbestos containing waste.	
§61.144 – Standard for Manufacturing	Stationary source does not engage in any manufacturing operations using commercial asbestos.	
§61.146 – Standard for Spraying	Stationary source does not spray apply asbestos containing materials.	
§61.147 – Standard for Fabricating	Stationary source does not engage in any fabricating operations using commercial asbestos.	
§61.148 – Standard for Insulating Materials	Stationary source does not install or reinstall, on any stationary source component, insulation material containing commercial asbestos.	
§61.149 – Standard for Waste Disposal for Asbestos Mills	Applies only to stationary sources subject to §61.142 (Asbestos Mills).	

Non Applicable Requirements	Reason for Non-Applicability
§61.151 – Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations	Applies only to those stationary sources subject to §§61.142; 61.144, or 61.147 (Asbestos Mills, manufacturing or fabricating).
§61.152 – Standard for Air-Cleaning	Stationary source does not use air cleaning equipment.
§61.153 – Standard for Reporting	No reporting requirements apply for sources subject to §61.145 (demolition and renovation) [ref §61.153(a)].
§61.154 – Standard for Active Waste Disposal Sites	Stationary source not an active waste disposal site and does not receive asbestos containing waste material.
§61.155 – Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations	Stationary source does not process regulated asbestos containing material (RACM).
<b>Activities subject to 40 C.F.R. 61 Subpart M – Standard for Demolition and Renovation (§61.145)</b>	
40 C.F.R. 61 Subpart A – General Provisions §61.05(a) – Prohibited Activities §61.07 – Application for Approval of Construction or Modification §61.09 – Notification of Startup	Owners or operators of demolition and renovation operations are exempt from the requirements of §§61.05(a), 61.07, and 61.09 [ref. 40 C.F.R. 61.145(a)(5)].
§61.10 – Source Reporting and Waiver Request	Demolition and renovation operations exempt from §61.10(a) [ref. 40 C.F.R. 61.153(b)].
§61.13 – Emission Tests §61.14 – Monitoring Requirements	Emission test or monitoring is not required under the standards for demolition and renovation [§61.145].
<b>Stationary Source-Wide</b>	
40 C.F.R. 61 Subpart V – National Emission Standard for Equipment Leaks ( Fugitive Emission Sources)	No process components in volatile hazardous air pollutant (VHAP) service, as defined by subpart (≥10 percent VHAP by weight).
40 C.F.R. 61 Subpart Y – National Emission Standard for Benzene Emissions from Benzene Storage Vessels	Stationary source does not operate storage vessels in benzene service.
40 C.F.R. 61 Subpart BB – National Emission Standard for Benzene emissions from Benzene Transfer Operations	Stationary source does not conduct benzene transfer operations.
40 C.F.R. 61 Subpart FF – National Emission Standard for Benzene Waste Operations	Stationary source does not conduct benzene waste operations.
40 C.F.R. 63 Subpart B – Requirements for Control Technology Determinations for Major Sources in Accordance with Clean Air Act Sections 112(g) and 112(j)	Stationary source is not a major source of HAPs.
40 C.F.R. 63 Subpart T – National Emission Standards for Halogenated Solvent Cleaning	Stationary source does not operate halogenated solvent cleaning machines.
40 C.F.R. 63 Subpart CC – National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries	Stationary source does not meet the definition for a petroleum refinery.



Non Applicable Requirements	Reason for Non-Applicability
40 C.F.R. 63 Subpart HH – National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities	Stationary source is not a major source of HAPs and black oil exemption applies; stationary source exclusively processes, stores, or transfers “black oil” (defined in the final promulgated rule as a petroleum liquid with an initial produced gas-to-oil ratio [GOR] less than 1,750 scf/bbl and an API gravity less than 40 degrees).
40 C.F.R. 63 Subpart HHH – National Emission Standards for Hazardous Air Pollutants for Natural Gas Transmission and Storage Facilities	Stationary source is not a major source of HAPs.
40 C.F.R. 63 Subpart EEEE – National Emission Standard for Organic Liquid Distribution	Stationary source is not a major source of HAPs.
<b>All Storage Tanks</b>	
40 C.F.R. 63 Subpart OO – National Emission Standards for Tanks – Level 1	Provisions only apply to tanks affected by 40 C.F.R. 60, 61, or 63 that specifically reference 40 C.F.R. 63 Subpart OO.
40 C.F.R. 63 Subpart SS – National Emission Standards for Closed Vent Systems	Provisions only apply to tanks affected by 40 C.F.R. 60, 61, or 63 that specifically reference 40 C.F.R. 63 Subpart SS.
<b>Drain Systems</b>	
40 C.F.R. 63 Subpart RR – National Emission Standards for Individual Drain Systems	Provisions only apply to drain systems affected by 40 C.F.R. 60, 61, or 63 that specifically reference 40 C.F.R. 63 Subpart RR.
<b>Oil-Water Separators</b>	
40 C.F.R. 63 Subpart VV – National Emission Standards for Oil-Water Separators and Organic-Water Separators	Provisions only apply to oil-water separators and organic-water separators affected by 40 C.F.R. 60, 61, or 63 that specifically reference 40 C.F.R. 63 Subpart VV.
<b>Stationary Source-Wide</b>	
40 C.F.R. 63 Subpart A – General Provisions [except §63.1(b) and §63.10(b)(3)]	Requirements only apply to sources subject to any provision of 40 C.F.R. 63. This stationary source is not subject to 40 C.F.R. 63 Subpart A, except for the requirement to determine rule applicability (§63.1(b)) and to keep records of rule applicability determination (§63.10(b)(3)).
40 C.F.R. 64 – Compliance Assurance Monitoring	The CAM rule defines “control device” to include only add-on controls and excludes “inherent process equipment.” The closed vent system for this tank is “inherent process equipment” which was installed and is operated primarily for material recovery and safety reasons, not for compliance with air quality regulations.

Non Applicable Requirements	Reason for Non-Applicability
40 C.F.R. 68 - Risk Management Programs [§112(r)]	"Naturally occurring hydrocarbon mixtures" (crude oil, condensate, natural gas and produced water) prior to entry into a petroleum refining process unit (NAICS code 32411) or a natural gas processing plant (NAICS code 211112) are exempt from the threshold determination. (See Final Rule exempting from threshold determination regulated flammable substances in naturally occurring hydrocarbon mixtures prior to initial processing, 63 FR 640 [January 6, 1998]). Less than 10,000 lbs. of other mixtures containing regulated flammable substances that meet the criteria for an NFPA rating of 4 for flammability are stored at the stationary source. Therefore, Gathering Center #1, a crude petroleum and natural gas production stationary source, (NAICS code 211111) does not process or store regulated flammable or toxic substances in excess of threshold quantities.
40 C.F.R. 82.1 Subpart A – Production and Consumption Controls	Stationary source does not produce, transform, destroy, import or export Class I or Group I or II substances or products.
40 C.F.R. 82.30 Subpart B – Servicing of Motor Vehicle Air Conditioners	Stationary source does not service motor vehicle air conditioners.
40 C.F.R. 82.60 Subpart C – Ban on Nonessential Products containing Class I Substances and Ban on Nonessential Products containing or Manufactured with Class II Substances	Stationary source is not a manufacturer or distributor of Class I and II products or substances.
40 C.F.R. 82.80 Subpart D – Federal Procurement	Subpart applies only to Federal departments, agencies, and instrumentalities.
40 C.F.R. 82.100 Subpart E – The Labeling of Products Using Ozone-Depleting Substances	Stationary source is not a manufacturer or distributor of Class I and II products or substances.
40 C.F.R. 82.158 Subpart F – Recycling and Emission Reductions	Stationary source does not manufacture or import recovery and recycling equipment.
40 C.F.R. 82.160 Subpart F – Approved Equipment Testing Organizations	Stationary source does not contract equipment testing organizations to certify recovery and recycling equipment.
40 C.F.R. 82.164 Subpart F – Reclaimer Certification	Stationary source does not sell reclaimed refrigerant.
40 C.F.R. 82, Subpart F, Appendix C – Method for Testing Recovery Devices for Use With Small Appliances	Stationary source is not a third part entity that certifies recovery equipment.
40 C.F.R. 82, Subpart F, Appendix D – Standards for Becoming a Certifying Program for Technicians	Stationary source does not have a technician certification program.
40 C.F.R. 82 Subpart G – Significant New Alternatives Policy Program (40 C.F.R. 82.174(a))	Stationary source does not manufacture substitute chemicals or products for ozone-depleting compounds.
40 C.F.R. 82 Subpart H – Halon Emissions Reduction (40 C.F.R. 82.270(a))	Stationary source does not manufacture halon.

## Section 11. Visible Emissions Forms

### VISIBLE EMISSION OBSERVATION FORM

This form is designed to be used in conjunction with EPA Method 9, "Visual Determination of the Opacity of Emissions from Stationary Sources." Temporal changes in emission color, plume water droplet content, background color, sky conditions, observer position, etc. should be noted in the comments section adjacent to each minute of readings. Any information not dealt with elsewhere on the form should be noted under additional information. Following are brief descriptions of the type of information that needs to be entered on the form: for a more detailed discussion of each part of the form, refer to "Instructions for Use of Visible Emission Observation Form."

- Stationary Source Name: full company name, parent company or division or subsidiary information, if necessary.
- Address: street (not mailing or home office) address of facility where VE observation is being made.
- Phone (Key Contact): number for appropriate contact.
- Emission Unit ID Number: number from NEDS, agency file, etc.
- Process Equipment, Operating Mode: brief description of process equipment (include type of facility) and operating rate, % capacity, and/or mode (e.g. charging, tapping, shutdown).
- Control Equipment, Operating Mode: specify type of control device(s) and % utilization, control efficiency.
- Describe Emission Point: for identification purposes, stack or emission point appearance, location, and geometry; and whether emissions are confined (have a specifically designed outlet) or unconfined (fugitive).
- Height Above Ground Level: stack or emission point height relative to ground level; can use engineering drawings, Abney level, or clinometer.
- Height Relative to Observer: indicate height of emission point relative to the observation point.
- Distance from Observer: distance to emission point; can use rangefinder or map.
- Direction from Observer: direction plume is traveling from observer.
- Describe Emissions and Color: include physical characteristics, plume behavior (e.g., looping, lacy, condensing, fumigating, secondary particle formation, distance plume visible, etc.), and color of emissions (gray, brown, white, red, black, etc.). Note color changes in comments section.
- Visible Water Vapor Present?: check "yes" if visible water vapor is present.
- If Present, is Plume...: check "attached" if water droplet plume forms prior to exiting stack, and "detached" if water droplet plume forms after exiting stack.
- Point in Plume at Which Opacity was Determined: describe physical location in plume where readings were made (e.g., 1 ft above stack exit or 10 ft. after dissipation of water plume).
- Describe Plume Background: object plume is read against, include texture and atmospheric conditions (e.g., hazy).
- Background Color: sky blue, gray-white, new leaf green, etc.
- Sky Conditions: indicate cloud cover by percentage or by description (clear, scattered, broken, overcast).
- Wind Speed: record wind speed; can use Beaufort wind scale or hand-held anemometer to estimate.
- Wind Direction From: direction from which wind is blowing; can use compass to estimate to eight points.
- Ambient Temperature: in degrees Fahrenheit or Celsius.
  - Wet Bulb Temperature: can be measured using a sling psychrometer
  - RH Percent: relative humidity measured using a sling psychrometer; use local US Weather Bureau measurements only if nearby.
- Source Layout Sketch: include wind direction, sun position, associated stacks, roads, and other landmarks to fully identify location of emission point and observer position.
  - Draw North Arrow: to determine, point line of sight in direction of emission point, place compass beside circle, and draw in arrow parallel to compass needle.
  - Sun's Location: point line of sight in direction of emission point, move pen upright along sun location line, mark location of sun when pen's shadow crosses the observer's position.
- Observation Date: date observations conducted.
- Start Time, End Time: beginning and end times of observation period (e.g., 1635 or 4:35 p.m.).
- Data Set: percent opacity to nearest 5%; enter from left to right starting in left column. Use a second (third, etc.) form, if readings continue beyond 30 minutes. Use dash (-) for readings not made; explain in adjacent comments section.
  - Comments: note changing observation conditions, plume characteristics, and/or reasons for missed readings.
  - Range of Opacity: note highest and lowest opacity number.
- Observer's Name: print in full.
  - Observer's Signature, Date: sign and date after performing VE observation.
- Organization: observer's employer.
- Certified By, Date: name of "smoke school" certifying observer and date of most recent certification.

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## Section 12. Material Balance Calculation

If the sulfur content of a fuel shipment is greater than 0.75 percent by weight, calculate the three-hour exhaust concentration of SO<sub>2</sub> using the following equations:

$$\begin{aligned} \text{A. } &= 31,200 \times [\text{wt}\% \text{S}_{\text{fuel}}] = 31,200 \times \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{B. } &= 0.148 \times [\text{wt}\% \text{S}_{\text{fuel}}] = 0.148 \times \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{C. } &= 0.396 \times [\text{wt}\% \text{C}_{\text{fuel}}] = 0.396 \times \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{D. } &= 0.933 \times [\text{wt}\% \text{H}_{\text{fuel}}] = 0.933 \times \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{E. } &= \text{B} + \text{C} + \text{D} = \underline{\hspace{1cm}} + \underline{\hspace{1cm}} + \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{F. } &= 21 - [\text{vol}\%_{\text{dry}} \text{O}_2, \text{exhaust}] = 21 - \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{G. } &= [\text{vol}\%_{\text{dry}} \text{O}_2, \text{exhaust}] \div \text{F} = \underline{\hspace{1cm}} \div \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{H. } &= 1 + \text{G} = 1 + \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{I. } &= \text{E} \times \text{H} = \underline{\hspace{1cm}} \times \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \\ \text{SO}_2 \text{ concentration} &= \text{A} \div \text{I} = \underline{\hspace{1cm}} \div \underline{\hspace{1cm}} = \underline{\hspace{1cm}} \text{ ppm} \end{aligned}$$

The wt% S<sub>fuel</sub>, wt% C<sub>fuel</sub>, and wt% H<sub>fuel</sub> are equal to the weight percents of sulfur, carbon, and hydrogen in the fuel. These percentages should total 100%.

The fuel weight percent (wt%) of sulfur is obtained pursuant to Condition 9.5 and/or Condition 9.8. The fuel weight percents of carbon and hydrogen are obtained from the fuel refiner.

The volume percent of oxygen in the exhaust (vol%<sub>dry</sub> O<sub>2</sub>, exhaust) is obtained from oxygen meters, manufacturer's data, or from the most recent ORSAT analysis at the same engine load used in the calculation.

Enter all of the data in percentages without dividing the percentages by 100. For example, if wt% S<sub>fuel</sub> = 1.0%, then enter 1.0 into the equations not 0.01 and if vol%<sub>dry</sub> O<sub>2</sub>, exhaust = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.346(c)]

### Section 13. Emission Factors

Use the emission factors in Table G to calculate the annual emission rates for Conditions 14 and 17.

**Table G – Emission Factors**

Type of Equipment	NO <sub>x</sub>	PM	CO
<b>Gas Turbines EU IDs 1, 2, &amp; 5 – 8</b>	The Permittee may use either the allowable short-term emission limit in Table D if greater than the source test results, or representative source test data. The Permittee shall use only one method consistently throughout the period of the calculation required for Condition 17.2 and note in the operating report which method was used for the calculation.	The Permittee may use either the allowable short-term emission limit or AP-42 emission factor if greater than source test results, or representative source test data. The Permittee shall use only one method consistently throughout the period of the calculation required for Condition 17.2 and note in the operating report which method was used for the calculation.	The Permittee may use either the allowable short-term emission limit if greater than the source test results, or representative source test data. The Permittee shall use only one method consistently throughout the period of the calculation required for Condition 17.2 and note in the operating report which method was used for the calculation.
<b>Gas Heaters &amp; Reboiler EU IDs 12, 13 and 20</b>	The Permittee may use either the allowable short-term emission limit in Table C or AP-42 emission factor if greater than source test results, or representative source test data. The Permittee shall use only one method consistently throughout the period of the calculation required for Condition 14.1 and note in the operating report which method was used for the calculation.	N/A	The Permittee may use either the allowable short-term emission limit or annual average of monthly CO concentrations recorded per Condition 12.2 (fresh air firing mode for EU IDs 12 and 13). The Permittee shall use only one method consistently throughout the period of the calculation required for Condition 14.1 and note in the operating report which method was used for the calculation.

[18 AAC 50.040(j); 18 AAC 50.326(j)]  
[40 C.F.R. 71.6(a)]

## Section 14. ADEC Notification Form<sup>25</sup>

Gathering Center #1 (GC#1)

AQ0182TVP02

Stationary Source Name

Air Quality Permit No.

BP Exploration (Alaska) Inc.

Company Name

Date

**When did you discover the Excess Emissions/Permit Deviation?**

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

Time: \_\_\_\_ : \_\_\_\_

**When did the event/deviation occur?**

Begin \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : \_\_\_\_ (Use 24-hr clock.)

Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : \_\_\_\_ (Use 24-hr clock.)

End Date: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ Time: \_\_\_\_ : \_\_\_\_ (Use 24-hr clock.)

**What was the duration of the event/deviation?** \_\_\_\_ : \_\_\_\_ (hrs:min) days  
or \_\_\_\_

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

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

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

### Section 1. Excess Emissions

(a) Was the exceedance: ☐ Intermittent or ☐ Continuous

(b) Cause of Event (Check one that applies):

- ☐ Start Up/Shut Down ☐ Natural Cause (weather/earthquake/flood)
- ☐ Control Equipment Failure ☐ Schedule Maintenance/Equipment Adjustment
- ☐ Bad Fuel/Coal/Gas ☐ Upset Condition ☐ Other \_\_\_\_\_

(c) Description

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

(d) Emissions Units Involved:

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

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

<sup>25</sup> Revised as of August 24, 2006.

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(e) Type of Incident (please check only one):

- ☐ Opacity \_\_\_\_\_ %      ☐ Venting \_\_\_\_\_ gas/scf      ☐ Control Equipment Down  
☐ Fugitive Emissions      ☐ Emission Limit Exceeded      ☐ Other \_\_\_\_\_  
☐ Marine Vessel Opacity      ☐ Flaring \_\_\_\_\_

(f) Unavoidable Emissions:

Do you intend to assert that these excess emissions were unavoidable?      ☐ Yes      ☐ No

Do you intend to assert the affirmative defense of 18 AAC 50.235?      ☐ Yes      ☐ No

*Certify Report (Go to end of form.)*

## Section 2. Permit Deviations

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

- ☐ Emission Unit-Specific      ☐ Generally Applicable Requirements  
☐ Failure to Monitor/Report      ☐ Reporting/Monitoring for Diesel Engines  
☐ General Source Test/Monitoring Requirements      ☐ Recordkeeping Failure  
☐ Recordkeeping/Reporting/Compliance Certification      ☐ Insignificant Emission Unit  
☐ Standard Conditions Not Included in the Permit      ☐ Stationary Source Wide  
☐ Other Section: \_\_\_\_\_ (Title of section and section number of your permit).

(b) Emission Unit Involved:

Identify the emission unit involved in the event, using the same identification number and name as in the permit. List the corresponding permit conditions and the deviation.

EU ID	EU Name	Permit Condition/ Potential Deviation

(c) Description of Potential Deviation:

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



(d) Corrective Actions:

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

**Certification:**

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_ Date: \_\_\_\_\_  
Signature: \_\_\_\_\_ Phone Number: \_\_\_\_\_

**NOTE:** *This document must be certified in accordance with 18 AAC 50.345(j)*

**To Submit this Report:**

Fax to: 907-451-2187

Or

Email to: [DEC.AQ.Airreports@alaska.gov](mailto:DEC.AQ.Airreports@alaska.gov)

*If faxed or emailed, the report must be certified within the Operating Report required for the same reporting period per Condition 71.*

Or

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

Or

Phone Notification: 907-451-5173

*Phone notifications require a written follow-up report.*

Or

Submission of information contained in this report can be made electronically at the following website:

<https://myalaska.state.ak.us/dec/air/airtoolsweb/>

*If submitted online, report must be submitted by an authorized E-Signer for the stationary source.*

[18 AAC 50.346(b)(3)]

## Section 15. Emission Inventory Form

<b>ADEC Reporting Form</b> Emission Inventory Reporting  <i>State of Alaska Department of Environmental Conservation</i> Division of Air Quality		Emission Inventory Year- [    ]
<i>Mandatory information is highlighted. Make additional copies as needed.</i>		
<b>Inventory start date:</b>		
<b>Inventory end date:</b>		
<b>Inventory Type:</b>		
<b>Facility Information:</b>		
<b>ADEC Stationary Source ID:</b>		
<b>(Stationary Source) Facility Name:</b>		
<b>AFS ID:</b>		
<b>Census Area/ Community:</b>		
<b>Line of Business (NAICS):</b>		
<b>Contact/Owner Name:</b>		
<b>Contact Owner Address:</b>		
<b>Contact/Owner Phone Number:</b>		
<b>Facility Physical Address:</b>		
	Lat: Long:	
<b>Mailing Address :</b>		

<b>Emission Unit:</b>	
<b>ID:</b>	
<b>Description:</b>	
<b>Manufacturer:</b>	
<b>Model Number:</b>	
<b>Serial Number:</b>	
<b>Year of Manufacture:</b>	
<b>Maximum Nameplate Capacity:</b>	
<b>Design Capacity (BTU/hr):</b>	
<b>Control Equipment (List All):</b>	
	<b>Control Equipment Type(Primary or Secondary):</b>
	<b>ID:</b>
	<b>Type:</b>
	<b>Manufacturer:</b>
	<b>Model:</b>
	<b>Control Efficiency (%):</b>
	<b>Capture Efficiency (%):</b>

		Total Capture Efficiency (%):	
Pollutants Controlled			

Processes (List All):	
	<b>PROCESS:</b>
	<b>SCC Code:</b>
	<b>Material Processed:</b>
	<b>Operational Periods:</b>
	<b>FUEL INFORMATION</b>
	<b>Ash Content (weight %):</b>
	<b>Elem. Sulfur Content (weight %):</b>
	<b>H2S Sulfur Content (ppmv):</b>
	<b>Heat Content (MMBtu/1000 gal or MMBtu/MMscf):</b>
	<b>Heat Input (MMBtu/hr):</b>
	<b>Heat Output (MMBtu/hr):</b>
	<b>THROUGHPUT</b>
	<b>Total Amount:</b>
	<b>Summer %:</b>
	<b>Fall %:</b>
	<b>Winter %:</b>
	<b>Spring %:</b>
	<b>Days/Week of Operation:</b>
	<b>Weeks/Year of Operation:</b>
	<b>Hours/Day of Operation:</b>
	<b>Hours/Year of Operation:</b>

<b>EMISSIONS</b>					
<b>Pollutant</b>	<b>Emission Factor</b>	<b>Emission Factor Numerator</b>	<b>Emission Factor Denominator</b>	<b>Emission Factor Origin</b>	<b>Tons Emitted</b>
CO					
NH3					
NOX					
PM10-PRI					
PM25-PRI					
SO2					
VOC					
Lead and lead compounds					

<b>Stack Description:</b>	
	<b>Stack Detail:</b>
	<b>ID:</b>
	<b>Type:</b>
	<b>Measurement Units:</b>
	<b>Base Elevation:</b>
	<b>Stack Height:</b>
	<b>Stack Diameter:</b>
	<b>Exit Gas Temp:</b>
	<b>Exit Gas Velocity:</b>
	<b>Actual Exit Gas Flow Rate:</b>
	<b>Data Source:</b>
	<b>Description:</b>
	<b>Latitude:</b>
	<b>Longitude:</b>
	<b>Location Description:</b>
	<b>Method Accuracy Description (MAD) Codes (as defined in 40 C.F.R. 51.50:</b>
	<b>Horizontal Reference Datum Code:</b>
	<b>Horizontal Accuracy (m):</b>
	<b>Horizontal Collection Method Code:</b>

**Certification:**

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

Printed Name: \_\_\_\_\_ Title \_\_\_\_\_ Date \_\_\_\_\_

Signature: \_\_\_\_\_ Phone number \_\_\_\_\_

**NOTE: This document must be certified in accordance with 18 AAC 50.345(j)**

**To Submit this report:**

1. Fax this form to: 907-465-5129; or
2. E-mail to: [DEC.AQ.airreports@alaska.gov](mailto:DEC.AQ.airreports@alaska.gov); or
3. Mail to: ADEC  
Air Permits Program  
410 Willoughby Ave., Suite 303  
PO Box 111800  
Juneau, AK 99801-1800

[18 AAC 50.346(b)(9)]