

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY CONTROL MINOR PERMIT

Minor Permit AQ0184MSS02

Preliminary – July 25, 2012

The Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0184MSS01 to the Permittee listed below.

**Permittee:** BP Exploration (Alaska) Inc (BPXA)  
P.O. Box 196612  
Anchorage, Alaska 99519

**Owner(s):** See next page

**Operator** Same as Permittee

**Stationary Source:** Gathering Center #3 (GC3)

**Location:** Latitude: 70° 17' 02" North; Longitude: 148° 40' 47" West

**Physical Address:** Sections 19 and 20, Township 11N, Range 13E, Umiat Meridian

**Project Name:** Hydrogen Sulfide Limit Increase Project

**Permit Contact:** Alejandra Castano (907) 564-5338, Alejandra.castano@bp.com

The permit is classified under 18 AAC 50.508(6) for revising or rescinding the terms and conditions established in a Title I permit. This permit authorizes the Permittee to increase the fuel gas hydrogen sulfide limit and revise the fuel oil sulfur content at GC3. The permit satisfies the obligation of the Permittee to comply with the air quality regulations under 18 AAC 50. As required by AS 46.14.120(c) the Permittee shall comply with the terms and conditions of this permit.

---

John F. Kuterbach, Manager  
Air Permits Program

**Legal Owners Names and Addresses**

**BP Exploration (Alaska) Inc.**

900 East Benson Blvd (zip 99508)

P.O. Box 196612

Anchorage AK, 99519-6612

**ExxonMobil Corporation**

3301 C Street, Suite 400 (zip 99503)

P.O. Box 196601

Anchorage, AK 99519-6601

**ConocoPhillips Alaska, Inc.**

700 G Street (zip 99501)

P.O. Box 100360

Anchorage, AK 99510-0360

**Chevron USA, Inc.**

P. O. Box 36366

Houston, TX 77236

## **Abbreviations/Acronyms**

AAC .....	Alaska Administrative Code
Department.....	Alaska Department of Environmental Conservation
ASTM .....	American Society of Testing and Materials
BPXA .....	BP Exploration (Alaska), Inc.
EPA .....	Environmental Protection Agency
GC3 .....	Gathering Center 3
ISO .....	International Standards Organization
wt% .....	percent by weight

## **Units and Measures**

hp.....	horsepower
lb .....	pounds
MMscf.....	million standard cubic feet
MMBtu/hr .....	million British thermal units per hour
ppmv .....	parts per million by volume
ppmw.....	parts per million by weight
scf.....	standard cubic feet per day
tpy .....	tons per year

## **Pollutants**

SO <sub>2</sub> .....	Sulfur Dioxide
H <sub>2</sub> S .....	Hydrogen Sulfide

---

## Table of Contents

Section 1. Emission Unit Inventory .....	5
Section 2. Emission Fees .....	6
Section 3. State Emissions Standards .....	7
Section 4. Ambient Air Quality Protection Requirements.....	8
Section 5. Best Available Control Technology Limit.....	10
Section 6. Limits to Avoid Prevention of Significant Deterioration Modification.....	13
Section 7. Standard Permit Conditions .....	14
Section 8. Permit Documentation .....	16
Attachment 1 - ADEC Notification Form.....	17

## Section 1. Emission Unit Inventory

- Emission Unit (EU) Description.** Emission units listed in Table 1 have specific limits for Title 1 purposes. Except as noted elsewhere in this permit, the information in Table 1 is for identification purposes only. The specific unit descriptions do not restrict the Permittee from replacing an emission unit identified in Table 1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement emission unit, including any applicable minor or construction permit requirements.

**Table 1 - EU Inventory at Gathering Center #3 (GC3)**

EU ID	Tag Number	Emission Unit Description	Rating / Size	Installed Date
Group I: Gas-Fired Turbines at Production Pad				
1	GTRB-03-7000	GE MS5352B Compressor	35,000 hp ISO	Prior to 12/81
2	GTRB-03-7001	GE MS5352B Compressor	35,000 hp ISO	Prior to 12/81
3	GTRB-03-7704A	Sulzer S3 Pump	7,910 hp ISO	Prior to 12/81
4	GTRB-03-7704B	Sulzer S3 Pump	7,910 hp ISO	Prior to 03/83
Group II: Gas-Fired Heaters at Production Pad				
5	B-03-0001	Cleaver Brooks 200500	20.9 MMBtu/hr	Prior to 04/77
6	B-03-0002	Cleaver Brooks 200500	20.9 MMBtu/hr	Prior to 04/77
7	B-03-0003	Cleaver Brooks 200500	20.9 MMBtu/hr	Prior to 04/77
8	B-03-0004	Cleaver Brooks 200500	20.9 MMBtu/hr	Prior to 04/77
9	B-03-0067	BS&B TEG Reboiler	8.2 MMBtu/hr	Modified 1990
10	B-03-0068	BS&B TEG Reboiler	8.2 MMBtu/hr	Modified 1990
11	B-03-7000	Cleaver Brooks 200500	33.5 MMBtu/hr	Prior to 12/81
12	B-03-7001	Cleaver Brooks 200500	33.5 MMBtu/hr	Prior to 12/81
13	B-03-7002	Cleaver Brooks 200500	33.5 MMBtu/hr	Prior to 12/81
14	B-03-7003	Cleaver Brooks 200500	33.5 MMBtu/hr	Prior to 12/81
15	B-03-7004	Cleaver Brooks 200500	33.5 MMBtu/hr	Prior to 12/81
Group III: Liquid Fuel-Fired Equipment at Production Pad				
16	GNED-03-0001	Detroit Emergency Generator	550 kW	After 1977
17	GNED-03-0002	Detroit Emergency Generator	550 kW	After 1977
18	GNED-03-0011	Detroit Emergency Generator	550 kW	After 1977
19	PED-03-7004	Detroit Firewater Pump	280 hp	After 1977
20	GNED-03-7500	Detroit Emergency Generator	2,685 kW	After 1977
21	GTRB-03-8001	Allison 501KB Turbine Gen	3,730 kW	After 1977
Group IV: Flares at Production Pad				
22	FL-03-0001	KALDAIR LP/HP Flares	840,000 scf/day (pilot & purge)	Approx 1977
23	FL-03-0002	KALDAIR LP/HP Flares		Approx 1977
24	FL-03-0003	KALDAIR LP/HP Flares		Approx 1977
25	FL-03-0004	KALDAIR LP/HP Flares		Approx 1977
26	FL-03-0005	KALDAIR HP Vertical Flares		Approx 1977
27	FL-03-0006	KALDAIR HP Vertical Flares		Approx 1977
28	FL-03-0007	KALDAIR HP Vertical Flares		Approx 1977
29	FL-03-0008	Burn Pit Emergency Flare		Unknown
30	FL-03-7001	BP Burn Pit Emergency Flare		Unknown
Group V: Fixed Roof Storage Tanks Greater Than 10,000 Gallon Capacity at Production Pad				
31	T-03-8511	Oil Skim Storage Tank	456,372 gallons	1990
32	T-03-8512	Oil Skim Storage Tank	456,372 gallons	1990
Well Pads A, B, C, and X				

## **Section 2. Emission Fees**

2. **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(b). 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
  - 2.1 the stationary source's assessable potential to emit of 3,806 tpy; or
  - 2.2 the stationary source's projected annual rate of emissions that will occur from July 1<sup>st</sup> to the following June 30<sup>th</sup>, 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.
3. **Assessable Emission Estimates.** Emission fees will be assessed as follows:
  - 3.1 No later than March 31<sup>st</sup> of each year, the Permittee may submit an estimate of the stationary source's assessable emissions to 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
  - 3.2 If no estimate is submitted on or before March 31<sup>st</sup> of each year, emission fees for the next fiscal year will be based on the potential to emit set forth in Condition 2.1.

### **Section 3. State Emissions Standards<sup>1</sup>**

4. **Visible Emissions:** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EUs 1 through 30 listed in Table 1 to reduce visibility through the exhaust effluent more than 20% averaged over any six consecutive minutes. Monitor, record, and report as described in the operating permit issued for the source under AS 46.130(b) and 18 AAC 50.
5. **Particulate Matter:** The Permittee shall not cause or allow particulate matter emitted from EUs 1 through 30 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours. Monitor, record, and report as described in the operating permit issued for the source under AS 46.130(b) and 18 AAC 50.
6. **Sulfur Compound Emissions:** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from EUs 1 through 30 to exceed 500 ppm averaged over three hours. Monitor, record, and report as described in the operating permit issued for the source under AS 46.130(b) and 18 AAC 50.

---

<sup>1</sup> Carried over from previous permit action (Operating / Construction Permit AQ0184TVP01) and updated to match the current regulatory language.

## **Section 4. Ambient Air Quality Protection Requirements**

The Permittee shall protect the 1-hour, 3-hour, 24-hour and annual average sulfur dioxide (SO<sub>2</sub>) Alaska Ambient Air Quality Standards and the 3-hour, 24-hour and annual average SO<sub>2</sub> increment by complying with Condition 7 through Condition 10.

7. **Operating Hours for EU 16 through 19:** The Permittee shall not operate any of EUs 16 through 19 for more than 200 hours per consecutive 12 months. Monitor, record, and report as follows:
  - 7.1 Monitor and record monthly the total hours each of the EUs operated during the month and during the preceding consecutive twelve months;
  - 7.2 Report in the operating report described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 the operating hours recorded under Condition 7.1;
  - 7.3 Report as permit deviations as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 if the operating hours recorded under Condition 7.1 exceed the limits in Condition 7 for any consecutive 12-month period.
8. **Operating Hours for EU 20 and EU 21:** The Permittee shall not operate EU 20 for more than 12 hours per day (hr/day) and EU 21 for more than 10 hr/day when any EU burns liquid fuel containing more than 15 parts per million by weight (ppmw) of sulfur. Monitor, record, and report as follows:
  - 8.1 Monitor and record daily the operating hours of EU 20 and EU 21. The recording may be kept in electronic format.
  - 8.2 Report in the operating report described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 the daily operating hours of EU 20 and EU 21 recorded in Condition 8.1.
  - 8.3 Report as permit deviations as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 if the operating hours of EU 20 and EU 21 recorded in Condition 8.1 exceeded the limits in Condition 5.
9. **Hydrogen Sulfide (H<sub>2</sub>S) Content of Fuel Gas Burned:** The H<sub>2</sub>S content of the fuel gas burned in EUs 1 through 15 and 22 through 30 shall not exceed:
  - 9.1 135 parts per million by volume (ppmv) when all the liquid-fired EUs burn liquid fuel containing no more than 15 ppmw of sulfur.
  - 9.2 125 ppmv when any liquid-fired EU burns fuel containing more than 15 ppmw of sulfur but no more than 0.11 percent by weight of sulfur and EU 21 is uncapped.
  - 9.3 120 ppmv when any liquid-fired EU burns fuel containing more than 15 ppmw of sulfur but no more than 0.11 percent by weight of sulfur and EU 21 is capped.



10. **Monitoring, Recording, and Reporting for Compliance with Condition 9:** Monitor, record, and report for compliance with Condition 9 as follows:

10.1 Monitor and record the

- a. H<sub>2</sub>S content of the fuel gas burned at the source at least as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC.
- b. Sulfur content of the liquid fuel delivered to the stationary source described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC.

10.2 Report in the operating report described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 5 the H<sub>2</sub>S content of the fuel gas and sulfur content of the liquid fuel recorded under Condition 10.1.

10.3 Report as permit deviations as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 if the H<sub>2</sub>S content of the fuel gas measured under Condition 10.1a exceeds the limits in Conditions 9.1, 9.2 and 9.3.

## ***Section 5. Best Available Control Technology Limit***

11. **Turbine BACT and Emission Limits<sup>2</sup>:** The Permittee shall limit actual emissions from the turbines, EUs 1 through 4, as indicated in Table 2.
  - 11.1 The Permittee shall calculate the monthly and the twelve-month consecutive summation of emissions of NO<sub>x</sub>, CO, and PM for EUs 1 through 4. Use the emission factors listed in Table 4 along with the hours of operation and/or amount of fuel used, to calculate the monthly emissions for each unit.
  - 11.2 Report the monthly and the consecutive twelve-month period summation of emissions for each month of the reporting period with each facility operating report as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50.
  - 11.3 Notify the Department as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 should the twelve-month consecutive summation of emissions of any pollutant that exceed the limit in Table 2.
  - 11.4 Monitor, record, and report in accordance with the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50 to demonstrate compliance with the short-term BACT NO<sub>x</sub> emission limit in Table 2.

---

<sup>2</sup> Carried over from federal Prudhoe Bay Unit PSD Permits PSD-X80-09 and PSD-X81-13.

**Table 2: Turbine Emission Limits**

Pollutant	EU	Make/Model	Equipment Tag Number	Emission Limit (short-term) per Individual Turbine	Annual Emission Limit per Individual Turbine (tpy) <sup>1</sup>
NO <sub>x</sub>	1 & 2	GE/MS5352B	GTRB-03-7000 & GTRB-03-7001	173 ppmvd @ 15% O <sub>2</sub>	1,115
	3 & 4	Sulzer/S3	GTRB-03-7704A GTRB-03-7704B	169 ppmvd @ 15% O <sub>2</sub>	230
CO	1 & 2	GE/MS5352B	GTRB-03-7000 & GTRB-03-7001	0.17 lb/MMBtu for each unit	269
	3 & 4	Sulzer/S3	GTRB-03-7704A GTRB-03-7704B	0.17 lb/MMBtu for each unit	56
PM	1 & 2	GE/MS5352B	GTRB-03-7000 & GTRB-03-7001	0.014 lb/MMBtu for each unit	22
	3 & 4	Sulzer/S3	GTRB-03-7704A	0.014 lb/MMBtu	4.6
			GTRB-03-7704B	No Limit	
SO <sub>2</sub>	4	Sulzer/S3	GTRB-03-7704B	200 ppmv H <sub>2</sub> S	1.5

Notes: 1) All emission limitations are annual average unless otherwise noted.  
- All turbine group emission limits for NO<sub>x</sub> refer to full load, ISO conditions.  
- All other emissions limits refer to full load, standard conditions.

12. The Permittee shall limit actual emissions from the heaters, EUs 11 through 15 as indicated in Table 4.
  - 12.1 The Permittee shall calculate the monthly and the twelve-month consecutive summation of emissions of NO<sub>x</sub>, CO and PM for EUs 11 through 15. Use the emission factors listed in Table 4, along with the hours of operation and/or amount of fuel used, to calculate the monthly emissions for each unit.
  - 12.2 Report the monthly and the consecutive 12-month period summation of emissions, for each month of the reporting period, with each facility operating report as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 50.
  - 12.3 Notify the Department as described in the operating permit issued to the stationary source under AS 46.130(b) and 18 AAC 5 should the 12-month consecutive summation of emissions of any air contaminant exceed the limit for that contaminant in Table 3.

**Table 3: Heater BACT Emission Limits Carried Over from EPA Permit PSD-X80-09**

Pollutant	EU	Make/Model	Equipment Tag Number	Emission Limit (short-term) per Individual Heater	Annual Emission Limit per Individual Heater (tpy) <sup>1</sup>
NO <sub>x</sub>	11 through 15	CB/200800	B-03-7000 & B-03-7001 & B-03-7002 & B-03-7003 & B-03-7004	0.14 lb/MMBtu	21
PM	11 through 15	CB/200800	B-03-7000 & B-03-7001 & B-03-7002 & B-03-7003 & B-03-7004	0.011 lb/MMBtu	1.6
CO	11 through 15	CB/200800	B-03-7000 & B-03-7001 & B-03-7002 & B-03-7003 & B-03-7004	0.035 lb/MMBtu	5.1

Notes: 1) All emission limitations are annual average unless otherwise noted.  
All emission limits refer to full load, standard conditions.

**Table 4: Emission Factors**

Equipment	NO <sub>x</sub>	CO	VOC	PM	SO <sub>2</sub>
Turbines, EUs 1 through 4	Allowable concentration or representative source test data if less than allowable concentration	Representative source test data if available. Otherwise use 0.082 lb/MMBtu (AP-42, 4/00)	Representative source test data if available. Otherwise use 0.0021 lb/MMBtu (AP-42, 4/00)	0.014 lb/MMBtu (allowable) or representative source test data if less than allowable.	Actual monthly H <sub>2</sub> S concentration
Heaters, EUs 11 through 15	Representative source test data or AP-42 emission factor if the source test data are not available <sup>1</sup>	0.035 lb/MMBtu (allowable) or representative source test data if less than allowable rate	N/A	Representative source test data, if available. Otherwise use 0.0075 lb/MMBtu (AP-42, 7/98)	N/A

<sup>1</sup> If current AP-42 emission factor is greater than the allowable short-term emission rate, use the allowable emission rate.

## **Section 6.      *Limits to Avoid Prevention of Significant Deterioration Modification***

13. The Permittee shall limit SO<sub>2</sub> emissions from all fuel gas burning EUs at the facility (EUs 1 through 15 and 22 through 30) to no more than 51.9 tons per 12-consecutive months. Monitor, record, and report as follows:
- 13.1 Monitor monthly the amount of fuel gas burned in EUs 1 through 15 and 22 through 30 with a fuel meter installed to measure the fuel gas burned in the EUs. The fuel meter should have an accuracy within five percent.
- 13.2 Record monthly the amount of fuel gas burned in EUs 1 through 15 and 22 through 30 in million standard cubic feet (MMscf).
- 13.3 Calculate and record the monthly SO<sub>2</sub> emissions for EUs 1 through 15 and 22 through 30 using the MMscf recorded in Condition 13.2, H<sub>2</sub>S content of the fuel measured in Condition 10.1a and the equation given below:
- $$\text{tons } SO_2 = [(MMscf) \times (ppmv \text{ } H_2S) \times (64 \text{ lb } SO_2 / \text{mole } H_2S)] \div [(379.6 \text{ scf/mole}) \times 2000]$$
- 13.4 Calculate and record the SO<sub>2</sub> emissions for each 12-consecutive months by adding the tons SO<sub>2</sub> recorded in Condition 13.3 to the SO<sub>2</sub> emissions for the preceding eleven months.
- 13.5 Report in the operating report required in the operating permit issued for the source under AS 46.130(b) and 18 AAC 50 the SO<sub>2</sub> emissions for the preceding 12-consecutive months recorded in Condition 13.4.
- 13.6 Report as excess emissions in the report required in the operating permit issued for the source under AS 46.130(b) and 18 AAC 50 if the SO<sub>2</sub> emissions exceeds the limit in Condition 13.

## **Section 7.     Standard Permit Conditions**

14. Compliance with permit terms and conditions is considered to be in compliance with those requirements that are
  - 14.1 included and specifically identified in the permit; or
  - 14.2 determined in writing in the permit to be inapplicable.
15. The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and the Clean Air Act (except for those terms or conditions designated in the permit as not federally enforceable), and is grounds for
  - 15.1 an enforcement action;
  - 15.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
  - 15.3 denial of an operating permit application.
16. It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.
17. **Access:** 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:
  - 17.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
  - 17.2 have access to and copy any records required by this permit;
  - 17.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
  - 17.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.
18. 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.
19. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
20. The permit does not convey any property rights of any sort, nor any exclusive privilege.
21. The Permittee shall furnish to the Department, within a reasonable time, any information that 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.
22. The Permittee shall certify any permit application, report, affirmation, or other 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 emissions 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.
23. Unless otherwise directed by the Department or this permit, the Permittee shall send two copies 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, emission source test reports, or other records under a cover letter certified in accordance with Condition 22.
24. 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.

## ***Section 8. Permit Documentation***

December 11, 2011	E-mail from Rachel Buckbee (BPXA) to Pat Dunn and Zeena Siddeek (ADEC) describing proposed modeling protocol.
January 24, 2012	BPXA submits minor permit application to revise H <sub>2</sub> S content of fuel gas burned at GC3.
January 24, 2012	Department determines application to be complete.
January 27, 2012	Email from Kwame Agyei (Department) to Rachel Buckbee on the characterization of the application.
January 30, 2012	Rachel Buckbee sends email to Kwame Agyei clarifying BPXA's understanding and characterization of the project.



**Attachment 1 - ADEC Notification Form<sup>3</sup>**

Excess Emissions and Permit Deviation Reporting  
State of Alaska Department of Environmental Conservation  
Division of Air Quality

*Stationary Source Name*

*Air Quality Permit Number*

BPXA \_\_\_\_\_  
*Company Name*

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

Date:        /        /        Time:        :

**When did the event/deviation?**

Begin: Date:        /        /        Time:        :        (please use 24hr clock)

End: Date:        /        /        Time:        :        (please use 24hr clock)

**What was the duration of the event/deviation:**        :        (hrs:min) or        days  
(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 conditions complete Section 2 and certify  
☐ Deviation from COBC, CO, or Settlement Agreement Complete Section 2 and certify

<sup>3</sup> Revised as of December 6, 2004

### 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 ☐ Scheduled Maintenance/Equipment Adjustments  
☐ 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) Emission unit(s) Involved:

Identify the emission units 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	Emission Unit Name	Permit Condition Exceeded/Limit/Potential Exceedance

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

☐ Opacity % ☐ Venting (gas/scf) ☐ Control Equipment Down  
☐ Fugitive Emissions ☐ Emission Limit Exceeded ☐ Record Keeping Failure  
☐ Marine Vessel Opacity ☐ Failure to monitor/report ☐ Flaring  
☐ Other:

(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 one only) (check boxes correspond with sections in permit)

- ☐ Emission Unit Specific  
☐ General Source Test/Monitoring Requirements  
☐ Recordkeeping/Reporting/Compliance Certification  
☐ Standard Conditions Not Included in Permit  
☐ Generally Applicable Requirements  
☐ Reporting/Monitoring for Diesel Engines  
☐ Insignificant Emission Unit  
☐ Stationary Source-Wide  
☐ Other Section: (title of section and section # of your permit)

(b) Emission unit(s) Involved:

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

EU ID	Emission Unit 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:**

1. Fax this form to: 907-451-2187

Or

2. Email to: [airreports@dec.state.ak.us](mailto:airreports@dec.state.ak.us)

*if faxed or emailed,*

Or

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

Or

4. Phone notifications: 907-451-5173.

*Phone notifications require written follow up report.*

Or

5. Submission of information contained in this report can be made electronically at the following website: *(web site is not yet available)*

*if submitted online, report must be submitted by an authorized E-Signer for the Stationary Source.*

Signature: \_\_\_\_\_

\_\_\_\_\_ Date