# DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR QUALITY OPERATING PERMIT

Permit No. AQ0062TVP03 Issue Date: Public Comment - March 31, 2015

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, **Hilcorp Alaska**, **LLC**, for the operation of the **Anna Platform**.

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 November 9, 2014 Register 212. All federal regulation citations are from those sections adopted by reference in this version of regulation in 18 AAC 50.040 unless otherwise specified.

Upon effective date of this permit, Operating Permit AQ0062TVP02, including all revisions, expires.

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

John F. Kuterbach, Manager Air Permits Program

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## List of Abbreviations Used in this Permit

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AACAlaska Administrative Code ADECAlaska Department of	NAICSNorth American Industry Classification System
Environmental Conservation	NESHAPsFederal National Emission
ASAlaska Statutes	Standards for Hazardous Air
ASTMAmerican Society for Testing and Materials	Pollutants [NESHAPs as contained in 40 C.F.R. 61 and 63]
BACTBest Available Control Technology	NO <sub>X</sub> Nitrogen Oxides
BHpBoiler Horsepower	NSPSFederal New Source Performance Standards [NSPS as contained in
C.F.RCode of Federal Regulations	40 C.F.R. 60]
The ActClean Air Act	O & M Operation and Maintenance
COCarbon Monoxide	O <sub>2</sub> Oxygen
dscfDry standard cubic foot	PALPlantwide Applicability Limitation
EPAUS Environmental Protection Agency	PM-10Particulate matter less than or equal to a nominal 10 microns in diameter
EUEmission Unit	PM-2.5Particulate matter less than or equal
gr./dscfgrain per dry standard cubic foot (1	to a nominal 2.5 microns in diameter
pound = 7000 grains)	ppmParts per million
GPHgallons per hour	ppmv, ppmvd Parts per million by volume on a dry
HAPsHazardous Air Pollutants [HAPs as defined in AS 46.14.990]	basis psiaPounds per Square Inch (absolute)
hpHorsepower	PSDPrevention of Significant
IDEmission Unit Identification	Deterioration
Number	PTEPotential to Emit
kPakiloPascals	SICStandard Industrial Classification
LAERLowest Achievable Emission Rate	SO <sub>2</sub> Sulfur dioxide
MACT Maximum Achievable Control	TPHTons per hour
Technology [MACT as defined in 40 C.F.R. 63]	TPYTons per year
MMBtu/hrMillion British thermal units per	VOCvolatile organic compound [VOC as defined in 40 C.F.R. 51.100(s)]
MMscfMillion standard cubic feet	VOLvolatile organic liquid [VOL as defined in 40 C.F.R. 60.111b,
MR&RMonitoring, Recordkeeping, and	Subpart Kb]
Reporting NANot applicable	vol%volume percent
1VA1VOL applicable	wt% weight percent

## Section 1. Stationary Source Information

## Identification

Permittee:		Hilcorp Alaska, LLC 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503		
Stationary Source	Name:	Anna Platform		
Location:		60° 58′ 36.98" North; 151° 18′ 47.99" West		
Physical Address:		Upper Cook Inlet, AK		
Owner/Operator		Hilcorp Alaska, LLC 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503		
Permittee's Responsible Official:		John A. Barnes, Senior Vice President 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503		
Designated Agent:		CT Corporation System 9360 Glacier Highway, Suite 202 Juneau, AK 99801		
Stationary Source and Building Contact:		John A. Barnes, Senior Vice President 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8370 jbarnes@hilcorp.com		
Fee and Permit Contact:		John A. Barnes, Senior Vice President 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8370 jbarnes@hilcorp.com		
Process	SIC Code	1311 - Crude Petroleum and Natural Gas		
Description:	NAICS Code:	211111 - Crude Petroleum and Natural Gas Extraction		

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

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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  $^{1}$ 

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EU ID	Tag Number	Emission Unit Name	Emission Unit Description	Fuel Type	Rating/ Size	Installation or Construction Date
2	A-PM-0500	Solar Saturn MK-I Turbine	Solar AC #3	Natural Gas	750 kW	1971
3	A-PM-0420	Solar Saturn T-1400 Turbine	Solar Bing #1	Natural Gas	1,400 hp	1996
4	A-PM-0430	Solar Saturn T-1400 Turbine	Solar Bing #2	Natural Gas	1,400 hp	1997
5	A-PM-0560	Solar Saturn MK-II Turbine	Solar AC #2	Natural Gas/ Diesel	800 kW	1985
7	A-PM-0390	Waukesha Triplex 1197G	Kobe Pump Drive #1	Natural Gas	150 hp	1968
8	A-PM-0400	Waukesha Triplex 1197G	Kobe Pump Drive #2	Natural Gas	150 hp	1968
9	A-PM-0410	Waukesha Triplex 1197G	Kobe Pump Drive #3	Natural Gas	150 hp	1968
10	A-PM-0440	Waukesha Triplex 1905G	Kobe Pump Drive #7	Natural Gas	180 hp	1968
11	A-PM-0450	Waukesha Triplex 1905G	Kobe Pump Drive #8	Natural Gas	180 hp	1968
12	A-PM-0460	Waukesha Triplex 1905G	Kobe Pump Drive #9	Natural Gas	180 hp	1968
13	A-PM-0028	Cat G-399 Engine	Standby Generator Drive	Natural Gas	750 hp	1982
14	A-PM-0880	Waukesha 1197D Engine	Fire Water Pump Drive	Diesel	192 hp	1966
15	A-PM-0034	Cat DE-3208 Engine	Backup Generator Drive	Diesel	235 hp	1984
16	A-CR-0650	John Deere 6135 Engine	SeaTrax West Crane	Diesel	500 hp	2007
17	A-CR-0651	Cat D-3406B Engine	Sea King East Crane	Diesel	325 hp	1988
18	A-PM-0021	Detroit Diesel D6-71 Engine	Air Compressor Drive	Diesel	165 hp	1979

EU ID	Tag Number	Emission Unit Name	Emission Unit Description	Fuel Type	Rating/ Size	Installation or Construction Date
19	A-SP- SF/HP/LP	Flare (HP/LP) and Pilot	Safety/Operating Flares	Natural Gas	700 Mscfd	1966
27	A-V-0580	Glycol Regenerator	TEG Dehydration Unit		2.72 MMscfd	2007

#### Notes:

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

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EU IDs 6 and 24 through 26 were removed from the Anna Platform in May 2014.

## 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 2 through 5, 7 through 19 and 27 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), 50.055(a)(1), & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

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- 1.1. For EU IDs 14 through 18 that have actual emissions less than the thresholds in 18 AAC 50.326(e), monitor, record and report in accordance with Condition 11.4. Otherwise monitor, record and report in accordance with Conditions 2 through 4 for the duration of the permit term.
- 1.2. For EU IDs 2 through 4 and 7 through 13, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 59 whether each of these emission units fired only gas during the period covered by the report. Report under Condition 58 if any fuel is burned other than gas.
- 1.3. For EU ID 5, use only gas as primary fuel. Monitoring for these emission units shall consist of a statement in each operating report required in Condition 59 indicating whether each of these emission units fired gas as the primary fuel during the period covered by this report. If operation on a back-up liquid fuel occurred during the period covered by the report, the Permittee shall monitor, record, and report according to Condition 9.
- 1.4. For EU ID 19, monitor, record and report in accordance with Condition 5.

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

#### Visible Emissions Monitoring, Recordkeeping and Reporting

Liquid Fuel-Fired Emission Units (EU IDs 14 through 18)

2. Visible Emissions Monitoring. When required by Condition 1.1, the Permittee shall observe the exhaust of EU IDs 14 through 18 for visible emissions using either the Method 9 Plan under Condition 2.1 or the Smoke/No-Smoke Plan under Condition 2.2. The Permittee may change visible-emissions plans for an emission unit at any time unless prohibited from doing so by Condition 2.3. The Permittee may for each unit elect to continue the visible emissions monitoring schedule in effect from the previous permit at the time a renewed permit is issued, if applicable.

[18 AAC 50.040(j), 50.326(j), & 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.

#### a. First Method 9 Observation.

(i) For any unit, observe exhaust for 18 minutes within 14 calendar days after changing from the Smoke/No-Smoke Plan of Condition 2.2.

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- (ii) For any unit replaced during the term of this permit, observe exhaust for 18 minutes within 30 days of startup.
- (iii) For each existing emission unit that exceeds a threshold in Condition 1.1, 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 scheduled operations, whichever is later.
- b. **Monthly Method 9 Observations**. After the first Method 9 observation, 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 2.1.b, 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.
- d. **Annual Method 9 Observations**. After at least two semiannual 18-minute observations, 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 intervals as described in Condition 2.1.b, until the criteria in Condition 2.1.c for semiannual monitoring are met.

- 2.2. **Smoke/No Smoke Plan.** Observe the exhaust for the presence or absence of visible emissions, excluding condensed water vapor.
  - a. **Initial Monitoring Frequency**. Observe the exhaust during each calendar day that an emission unit operates.
  - b. **Reduced Monitoring Frequency**. After the emission unit has been observed on 30 consecutive operating days, if the emission unit operated without visible smoke in the exhaust for those 30 days, then observe emissions at least once in every calendar month that an emission unit operates.
  - c. **Smoke Observed**. If smoke is observed, either begin the Method 9 Plan of Condition 2.1 or perform the corrective action required under Condition 2.3
- 2.3. **Corrective Actions Based on Smoke/No Smoke Observations.** If visible emissions are present in the exhaust during an observation performed under the Smoke/No Smoke Plan of Condition 2.2, then the Permittee shall either follow the Method 9 Plan of Condition 2.1 or
  - a. initiate actions to eliminate smoke from the emission unit within 24 hours of the observation;
  - b. keep a written record of the starting date, the completion date, and a description of the actions taken to reduce smoke; and
  - c. after completing the actions required under Condition 2.3.a,
    - (i) take smoke/no smoke observations in accordance with Condition 2.2.
      - (A) at least once per day for the next seven operating days and until the initial 30 day observation period is completed; and
      - (B) continue as described in Condition 2.2.b; or
    - (ii) if the actions taken under Condition 2.3.a do not eliminate the smoke, or if subsequent smoke is observed under the schedule of Condition 2.3.c(i)(A), then observe the exhaust using the Method 9 Plan unless the Department gives written approval to resume observations under the Smoke/No Smoke Plan; after observing smoke and making observations under the Method 9 Plan, the Permittee may at any time take corrective action that eliminates smoke and restart the Smoke/No Smoke Plan under Condition 2.2.a.
- **3. Visible Emissions Recordkeeping.** When required by Condition 1.1, the Permittee shall keep records as follows:

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

3.1. When using the Method 9 Plan of Condition 2.1,

#### a. the observer shall record

(i) 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;

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- (ii) 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 mode (load or fuel consumption rate or best estimate if unknown) on the sheet at the time opacity observations are initiated and completed;
- (iii) 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;
- (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emission Observation Form in Section 11, and
- (v) 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.
- b. 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.
- c. Calculate and record the highest 6-minute and 18-consecutive-minute averages observed.
- 3.2. If using the Smoke/No Smoke Plan of Condition 2.2, record the following information in a written log for each observation and submit copies of the recorded information upon request of the Department:
  - a. the date and time of the observation;
  - b. from Table A, the ID of the emission unit observed;
  - c. whether visible emissions are present or absent in the exhaust;
  - d. a description of the background to the exhaust during the observation;
  - e. if the emission unit starts operation on the day of the observation, the startup time of the emission unit;
  - f. name and title of the person making the observation; and
  - g. operating mode (load or fuel consumption rate).

**4. Visible Emissions Reporting.** When required by Condition 1.1, the Permittee shall report visible emissions as follows:

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

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- 4.1. Include in each operating report under Condition 59 for the period covered by the report:
  - a. which visible-emissions plan of Condition 2 was used for each emission unit; if more than one plan was used, give the time periods covered by each plan;
  - b. for each emission unit under the Method 9 Plan,
    - (i) copies of the observation results (i.e. opacity observations) for each emission unit that used the Method 9 Plan, except for the observations the Permittee has already supplied to the Department; and
    - (ii) a summary to include:
      - (A) number of days observations were made;
      - (B) highest six-minute average observed; and
      - (C) dates when one or more observed six-minute averages were greater than 20 percent;
  - c. for each emission unit under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed: and
  - d. a summary of any monitoring or recordkeeping required under Conditions 2 and 3 that was not done;
- 4.2. Report under Condition 58:
  - 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.

Flare (EU ID 19)

**5. Visible Emissions Monitoring, Recordkeeping, and Reporting.** For EU ID 19, the Permittee shall observe one daylight flare event<sup>1</sup> within 12 months of the preceding flare event observation. If no event exceeds 1 hour within that 12-month period, then the Permittee shall observe the next daylight flare event.

<sup>&</sup>lt;sup>1</sup> For purposes of this permit, a "flare event" is flaring of gas for greater than one hour as a result of scheduled release operations, i.e. maintenance or well testing activities. It does not include non-scheduled release operations, i.e. process upsets, emergency flaring, or de-minimis venting of gas incidental to normal operations.

- 5.1. Monitor flare events using Method 9.
- 5.2. Record the following information for observed events:
  - a. the flare 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 59 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 59 for the period covered by that report.
- 5.5. Report under Condition 58 whenever the opacity standard in Condition 1 is exceeded.

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

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#### **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 2 through 5, 7 through 19 and 27 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), 50.055(b)(1) & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

- 6.1. For EU IDs 14 through 18, that have actual emissions less than the thresholds in 18 AAC 50.326(e), monitor, record and report in accordance with Condition 11.4. Otherwise monitor, record and report in accordance with Conditions 7 and 8 for the duration of the permit term.
- 6.2. For EU IDs 2 through 4 and 7 through 13, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 59 whether each of these emission units fired only gas during the period covered by the report. Report under Condition 58 if any fuel other than gas is burned.

- 6.3. For EU ID 5, use gas as primary fuel. Monitoring for these emission units shall consist of a statement in each operating report required in Condition 59 whether each of these emission units fired gas as the primary fuel during the period covered by the report. If operation on a back-up liquid fuel occurred during the period covered by the report, the Permittee shall monitor, record and report according to Condition 9.
- 6.4. For EU ID 19, the Permittee must annually certify compliance under Condition 60 with the particulate matter standard.

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

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## PM Monitoring, Recordkeeping and Reporting

Liquid Fuel-Fired Engines (EU IDs 5 and 14 through 18)

7. Particulate Matter Monitoring for Diesel Engines and Liquid-Fired Turbines. The Permittee shall conduct source tests on diesel engines, EU IDs 14 through 18, and liquid-fired turbines, EU ID 5 if required by Condition 9.2, to determine the concentration of particulate matter (PM) in the exhaust of an emission unit in accordance with this Condition 7.

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

- 7.1. Except as provided in Condition 7.4 within six months of exceeding the criteria of Condition 7.2.a or 7.2.b, either
  - a. conduct a PM source test according to requirements set out in Section 6; or
  - 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 Liquid-Fired Turbines. The Permittee shall report as follows:

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

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- 8.1. Report under Condition 58
  - 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 7.1.a or 7.1.b, this must be reported by the day following the day compliance with Condition 7.1 was required;
- 8.2. Report observations in excess of the threshold of Condition 7.2.b within 30 days of the end of the month in which the observations occur;
- 8.3. In each operating report under Condition 59, include for the period covered 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.

#### **VE & PM MR&R for Dual Fuel-Fired Emission Units**

**9.** For EU ID 5, the Permittee shall monitor, record and report the monthly hours of operation when operating on a back-up liquid fuel.

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

9.1. If EU ID 5 does not exceed 400 hours of operations per calendar year on a backup liquid fuel, monitoring of compliance for visible emissions and particulate matter is not required for the emission unit and monitoring shall consist of an annual certification of compliance under Condition 60 with the visible emission and particulate matter standards in Conditions 1 and 6.

- 9.2. For EU ID 5, notify the Department and begin monitoring the emission unit according to Condition 9.3 no later than 15 days after the end of a calendar month in which the cumulative hours of operation for the calendar year exceed any multiple of 400 hours on a back-up liquid fuel. If the observation exceeds the limit in Condition 1, monitor as described in Condition 7. If the observation does not exceed the limit in Condition 1, no additional monitoring is required until the cumulative hours of operation exceed each subsequent multiple of 400 hours on back-up liquid fuel during a calendar year<sup>2</sup>.
- 9.3. When required to do so by Condition 9.2, observe the 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.
- 9.4. Keep records and report in accordance with Conditions 3, 4, and 8 as applicable.
- Report under Condition 58 if the Permittee fails to comply with Condition 9.2, 9.3 9.5. or 9.4.

## **Sulfur Compound Emission Standards Requirements**

10. Sulfur Compound Emissions. In accordance with 18 AAC 50.055(c), the Permittee shall not cause or allow sulfur compound emissions, expressed as SO<sub>2</sub>, from EU IDs 2 through 5, 7 through 19, and 27 to exceed 500 ppm averaged over three hours.

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

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For Fuel Oil<sup>3</sup>(EU IDs 5 and 14 through 18)

- The Permittee shall do one of the following for each shipment of fuel: 10.1.
  - If the fuel grade requires a sulfur content less than 0.5 percent by weight, a. keep receipts that specify fuel grade and amount; or
  - If the fuel grade does not require a sulfur content less than 0.5 percent by b. weight, keep receipts that specify fuel grade and amount and
    - (i) test the fuel for sulfur content; or
    - 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.
- 10.2. Fuel testing under Condition 10.1 must follow 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).

If the requirement to monitor is triggered more than once in a calendar month, only one Method-9 observation is required to be conducted by the stated deadline for that month.

Oil means 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 7/1/07.

- 10.3. If a load of fuel contains greater than 0.75 percent sulfur by weight, the Permittee shall calculate SO<sub>2</sub> emissions in ppm using either the material balance calculation in Section 12 or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).
- 10.4. The Permittee shall report as follows:
  - a. If SO<sub>2</sub> emissions calculated under Condition 10.3 exceed 500 ppm, the Permittee shall report under Condition 58. When reporting under this condition, include the calculation under Condition 10.3.
  - b. The Permittee shall include in the operating report required by Condition 59
    - (i) a list of the fuel grades received at the stationary source during the reporting period;
    - (ii) for any grade with a maximum fuel sulfur greater than 0.25 percent sulfur, the fuel sulfur of each shipment; and
    - (iii) for fuel with a sulfur content greater than 0.75 percent, the calculated SO<sub>2</sub> emissions in ppm.

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

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For Fuel Gas (EU IDs 2 through 5, 7 through 13 and 19)

- 10.5. **Monitoring and Recording**. The Permittee shall monitor and record the fuel total sulfur content of a representative sample of the fuel gas in accordance with Condition 21.1.
- 10.6. **Reporting.** The Permittee shall report as follows:
  - a. Report as excess emissions, in accordance with Condition 58, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 10.
  - b. Include copies of the records required by Condition 10.5 with the operating report required by Condition 59 for the period covered by the report.

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

## **Insignificant Emission Units**

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

[18 AAC 50.050(a) & 50.055(a)(1)]

11.2. **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)]

11.3. **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)]

- 11.4. General MR&R for Insignificant Emission Units
  - a. The Permittee shall submit the certification of compliance of Condition 60 based on reasonable inquiry;
  - b. The Permittee shall comply with the requirements of Condition 41;
  - c. The Permittee shall report in the operating report required by Condition 59 if an emission unit is insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and actual emissions become greater than any of those thresholds; and
  - d. No other monitoring, recordkeeping or reporting is required.

[18 AAC 50.346(b)(4)]

## Section 4. Federal Requirements

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

**12. NSPS Subpart A Notification.** For any affected facility<sup>4</sup> or existing facility<sup>5</sup> regulated under NSPS requirements in 40 C.F.R. 60, the Permittee shall furnish the Department and EPA written or electronic notification of:

[18 AAC 50.035 & 50.040(a)(1)] [40 C.F.R. 60.7(a) & 60.15(d), Subpart A]

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- 12.1. any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies unless that change is specifically exempted under an applicable subpart or in 40 C.F.R. 60.14(e), postmarked 60 days or as soon as practicable before the change is commenced and shall include:
  - a. information describing the precise nature of the change,
  - b. present and proposed emission control systems,
  - c. productive capacity of the facility before and after the change, and
  - d. the expected completion date of the change;

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

12.2. any proposed replacement of an existing facility, for which the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, postmarked as soon as practicable, but no less than 60 days before commencement of replacement, and including the following information:

[40 C.F.R. 60.15(d), Subpart A]

- a. the name and address of owner or operator,
- b. the location of the existing facility,
- c. a brief description of the existing facility and the components that are to be replaced,
- d. a description of the existing and proposed air pollution control equipment,
- e. an estimate of the fixed capital cost of the replacements, and of constructing a comparable entirely new facility,
- f. the estimated life of the existing facility after the replacements, and

<sup>4</sup> Affected facility means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 C.F.R. 60.2, effective 7/1/07

<sup>&</sup>lt;sup>5</sup> Existing facility means, with reference to a stationary source, any apparatus of the type for which a standard is promulgated in this part, and the construction or modification of which was commenced before the date of proposal of that standard; or any apparatus which could be altered in such a way as to be of that type, as defined in 40 C.F.R. 60.2, effective 7/1/07.

- g. a discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.
- 13. 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 3 through 5 and 16, any malfunctions of associated air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for EU IDs 3 through 5 and 16 is inoperative.

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

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14. NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report. For EU IDs 3 through 5, the Permittee shall submit to the Department and to EPA an excess emissions and monitoring systems performance report (EEMSP)<sup>6</sup> (excess emissions are defined in Condition 21.4 and limits are in Condition 21) and-or summary report form (see Condition 15). The Permittee shall submit the report(s) to the EPA and Department semiannually, except when: more frequent reporting is specifically required by an applicable subpart; or the EPA, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th 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]

14.1. 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), Subpart A]

14.2. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of EU IDs 3 through 5; 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]

14.3. The date and time identifying each period during which a Continuous Monitoring System (CMS) was inoperative except for zero and span checks and the nature of any repairs or adjustments.

[40 C.F.R. 60.7(c)(3), Subpart A]

14.4. When no excess emissions have occurred or the continuous monitoring system(s) have not been inoperative, repaired, or adjusted, such information shall be stated in the report.

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

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<sup>&</sup>lt;sup>6</sup> The federal EEMSP report is not the same as the state excess emission report required by Condition 58.

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15. 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 (see Attachment A) for each pollutant monitored for EU IDs 3 through 5. The report shall be submitted semiannually, postmarked by the 30th day following the end of each 6month period, except when more frequent reporting is specifically required by an applicable subpart, case-by-case basis, or the EPA, as follows:

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

If the total duration of excess emissions for the reporting period is less than one 15.1. 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 a summary report form unless the EEMSP report described in Condition 14 is requested, or

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

15.2. 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 time for the reporting period, then submit a summary report form and the EEMSP described in Condition 14.

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

**16.** NSPS Subpart A Performance (Source) Tests. The Permittee shall conduct source tests according to Section 6 and as indicated in this condition 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. The Permittee shall:

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

16.1. Conduct source tests and reduce data as set out in 40 C.F.R. 60.8(b), and provide the Department copies of any EPA waivers or approvals of alternative methods.

[40 C.F.R. 60.8(b), Subpart A]

16.2. Conduct source tests under conditions specified by EPA to be based on representative performance of EU IDs 3 through 5 and 16.

[40 C.F.R. 60.8(c), Subpart A]

16.3. Notify the Department and EPA at least 30 days in advance of the source test.

[40 C.F.R. 60.8(d), Subpart A]

16.4. Provide adequate sampling ports, safe sampling platform(s), safe access to sampling platform(s), and utilities for sampling and testing equipment.

[40 C.F.R. 60.8(e), Subpart A]

17. 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 3 through 5 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The Administrator will determine whether acceptable operating and maintenance procedures are being used 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 3 through 5.

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

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18. 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 20 and 21, 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 3 through 5 would have been in compliance with applicable requirements of 40 C.F.R. Part 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]

19. 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 Condition 20, 21, or 22. 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]

#### **Turbines Subject to Federal NSPS Subpart GG**

**20. NSPS Subpart GG NO**x **Standard.** The Permittee shall not allow the exhaust gas concentration of NO<sub>X</sub>, on a dry basis at 15 percent O<sub>2</sub> and ISO conditions, from any of EU IDs 3, 4, and 5 to exceed 150 ppmv.

[18 AAC 50.040(a)(2)(V), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.332(a)(2) & (d), Subpart GG]

20.1. **Emergency Fuel.** Stationary gas turbines with a heat input greater than or equal to 10.7 gigajoules per hour (10 million Btu/hour) when fired with natural gas are exempt from the standards in Condition 20 when being fired with an emergency fuel<sup>7</sup>.

[18 AAC 50.040(j) & 50.326(j)(4)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.332(k), Subpart GG]

<sup>7</sup> Emergency fuel is a fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine.

## 20.2. **Monitoring.** The Permittee shall comply with the following:

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

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- a. **Periodic Testing.** For each turbine subject to Condition 20, once a turbine operates for 400 hours or more in any 12-consecutive-month period during the life of this permit, the Permittee shall comply with Conditions 20.2.a(i) and 20.2.a(ii) for that turbine.
  - (i) For existing turbines whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the limit shown in Condition 20, 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, within the applicable criteria below:
    - (A) Within 5 years of the latest performance test, or
    - (B) Within 1 year of exceeding the 400 hour of operation threshold in Condition 20.2.a if the previous source test occurred greater than 4 years prior to the exceedance.
  - (ii) For existing turbines whose latest emissions source testing was certified as operating at greater than 90 percent of the limit shown in Condition 20, 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, annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the limit shown in Condition 20.
- b. **Substituting Test Data.** The Permittee may use a Method 20, or Method 7E and either Method 3 or 3A, test under Condition 20.2.a performed on only one of a group of 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 NO<sub>X</sub> limit shown in Condition 20, and are projected under Condition 20.2.c to be less than or equal to 90 percent of the limit at maximum load;
  - (ii) for any source test done after the issuance date of this permit, the Permittee identifies in a source test plan under Condition 50
    - (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;

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- (2) is tested under close to identical ambient conditions;
- (3) is the same make and model and has identical injectors and combustor:
- (4) uses the same fuel type from the same source.
- (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  $NO_X$  limit shown in Condition 20.
- c. **Load.** The Permittee shall comply with the following:
  - (i) Conduct all tests under Condition 20.2 in accordance with 40 C.F.R. 60.335, 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 NO<sub>X</sub> 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 20.2 to predict the highest load at which emissions will comply with the NO<sub>X</sub> limit shown in Condition 20;
    - (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 the NO<sub>X</sub> limit shown in Condition 20;

- (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,

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- (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 20.2.c(iii)(A); the new limit is subject to any new Department finding under Condition 20.2.c(iii)(C) and
- (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 20.2.c(iii).
- (v) For the purposes of Conditions 20.2 through 20.4, 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.
- 20.3. **Recordkeeping.** The Permittee shall keep records as follows:

[18 AAC 50.040(j) & 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 20.2.c(iii) does not show compliance with the NO<sub>X</sub> limit shown in Condition 20 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 20.3.a shall be hourly or otherwise as approved by the Department.
- (iii) Within one month after submitting a demonstration under Condition 20.2.c(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 20.2.c(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. Prior to exceeding the hour threshold in Condition 20.2.a, the Permittee shall keep monthly records of the hours of operation of any turbine subject to Condition 20 that will operate less than 400 hours in any 12 consecutive months.
- 20.4. **Reporting.** The Permittee shall keep report as follows:

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

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- a. In each operating report under Condition 59 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 20.2.c(iii)
  - (i) the load limit;
  - (ii) the turbine identification; and
  - (iii) the highest load recorded under Condition 20.3.a during the period covered by the operating report.
- b. In each operating report under Condition 59 for each turbine for which Condition 20.2 has not been satisfied because the turbine operates less than 400 hours, 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 58 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 20.2.a(i) or 20.2.a(ii) but not performed, or
- (iii) the turbine was operated at a load exceeding that allowed by Conditions 20.2.c(iii)(B) and 20.2.c(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) through (c) & 50.040(a)(1)] [40 C.F.R. 60.8(b), Subpart A]

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21. NSPS Subpart GG Sulfur Standard. For EU IDs 3, 4, and 5, the Permittee shall not burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8,000 ppmw).

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[18 AAC 50.040(a)(2)(V), (j)(4) & 50.326(j)]

[40 C.F.R. 71.6(a)(1)]

[40 C.F.R. 60.333(b), Subpart GG]
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21.1. **Monitoring.** The Permittee shall monitor compliance with the standards listed in this condition, as follows:

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[18 AAC 50.040(a)(2)(V), (j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(i)]
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a. Monitor the total sulfur content of the fuel being fired in the turbine, except as provided in Condition 21.1.b. The sulfur content of the fuel must be determined using total sulfur methods described in Condition 21.2. 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 (all of which are incorporated by reference-see 40 C.F.R. 60.17), which measure the major sulfur compounds may be used.

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

b. The owner or operator may elect not to monitor the total sulfur content of the gaseous fuel combusted in the turbine, if the gaseous fuel is demonstrated to meet the definition of natural gas in 40 C.F.R. 60.331(u), regardless of whether an existing custom schedule approved by the Administrator requires such monitoring. The owner or operator shall use one of the following sources of information to make the required demonstration:

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

(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)(i) & (ii), Subpart GG]

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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 owner or operator may, without submitting a special petition to the Administrator, continue monitoring on this schedule.

[40 C.F.R. 60.334(h)(4), Subpart GG] [EPA Custom Fuel Monitoring Schedule for UOCC Cook Inlet Facilities, 10/17/02]

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

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

(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. part 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).

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

(ii) Gaseous fuel. For owners and operators that elect not to demonstrate sulfur content using options in Condition 21.1.b, and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined and recorded once per unit operating day.

[40 C.F.R. 60.334(i)(2), Subpart GG]

(iii) Custom schedules. Notwithstanding the requirements of Condition 21.1.d(ii), operators or fuel vendors may develop custom schedules 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. Except as provided in 40 C.F.R. 60.334(i)(3)(i) and (i)(3)(ii), custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in Condition 21. 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)(3), Subpart GG]

21.2. **Test Methods and Procedures.** If the owner or operator is required under Condition 21.1.d to periodically determine the sulfur content of the fuel combusted in the turbine, the owner or operator shall analyze the samples for the total sulfur content of the fuel as follows:

[18 AAC 50.040(a)(2)(V), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(i)] [40 C.F.R. 60.335(b)(10), Subpart GG]

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- a. For liquid fuels, use 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); or
- b. For gaseous fuels, use ASTM D1072-80, 90 (Reapproved 1994); D3246-81, 92, 96; D4468-85 (Reapproved 2000); or D6667-01 (all of which are incorporated by reference, see 40 C.F.R. 60.17). 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)(1) & (2), Subpart GG]

c. The fuel analyses 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]

21.3. **Recordkeeping.** The Permittee shall keep records as required by Conditions 21.1 and 21.2, and in accordance with Condition 54.

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

21.4. **Reporting.** For each affected unit that elects to periodically determine the fuel sulfur content under Condition 21.1, the owner or operator shall submit reports of excess emissions and monitor downtime, in accordance with 40 C.F.R. 60.7(c) as summarized in Condition 14, except where otherwise approved by a custom fuel monitoring schedule. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under 40 C.F.R. 60.7(c), periods of excess emissions and monitor downtime that shall be reported are defined as follows:

[18 AAC 50.040(a)(2)(V), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)] [40 C.F.R. 60.334(j), Subpart GG]

a. If the owner or operator is required to monitor the sulfur content of the fuel under Condition 21.1:

[40 C.F.R. 60.334(j)(2), Subpart GG]

- (i) For samples of gaseous fuel and for oil samples obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.
- (ii) If the option to sample each delivery of fuel oil has been selected, the owner or operator shall immediately switch to one of the other oil sampling options (i.e., daily sampling, flow proportional sampling, or sampling from the unit's storage tank) if the sulfur content of a delivery exceeds 0.8 weight percent. The owner or operator shall continue to use one of the other sampling options until all of the oil from the delivery has been combusted, and shall evaluate excess emissions according to Condition 21.4.a(i). When all of the fuel from the delivery has been burned, the owner or operator may resume using the as-delivered sampling option.
- (iii) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime shall include only unit operating hours, and ends on the date and hour of the next valid sample.

[40 C.F.R. 60.334(j)(2)(i) through (iii), Subpart GG]

b. *Emergency fuel*. Each period during which an exemption provided in Condition 20.1 is in effect shall be included in the report required in 40 C.F.R. 60.7(c). For each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported.

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

Date: Public Comment - March 31, 2015

Expires: Five Years

### **Engines Subject to Federal NSPS Subpart IIII**

**22.** For EU ID 16, the Permittee shall comply with all applicable requirements in 40 C.F.R. 60 Subpart IIII for stationary compression ignition (CI) internal combustion engines (ICE) whose construction, modification, or reconstruction commences after July 11, 2005.

[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.4200(a)(2), Subpart IIII]

22.1. The Permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in Condition 22.3 over the entire life of the engine.

[40 C.F.R. 60.4206, Subpart IIII]

22.2. The Permittee shall comply with the applicable provisions of NSPS Subpart A as specified in Table 8 to NSPS Subpart IIII.

[40 C.F.R. 60.4218 & Table 8, Subpart IIII]

### NSPS Subpart IIII Emission Standards

22.3. For EU ID 16, the Permittee must comply with the emission standards in Table B.

[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

[40 C.F.R. 60.4204(a), Subpart IIII]

Table B – Engine Emission Standards in g/kW-hr (g/hp-hr)

HC	$NO_X$	CO	PM
1.3 (1.0)	9.2 (6.9)	11.4 (8.5)	0.54 (0.40)

[Table 1, Subpart IIII]

22.4. For EU ID 16, the Permittee must meet the not-to-exceed (NTE) standards as indicated in 40 C.F.R. 60.4212, for performance tests conducted in-use.

[40 C.F.R. 60.4204(d), Subpart IIII]

#### NSPS Subpart IIII Compliance Requirements

22.5. For EU ID 16, the Permittee must do all of the following, except as permitted under Condition 22.7:

[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.4211(a), Subpart IIII]

- a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; and
- b. Change only those emission-related settings that are permitted by the manufacturer.

[40 C.F.R. 60.4211(a)(1) & (2), Subpart IIII]

22.6. For EU ID 16, the Permittee must demonstrate compliance according to one of the methods specified in Conditions 22.6.a through 22.6.c.

[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.4211(b), Subpart IIII]

- a. Keeping records of performance test results for each pollutant for a test conducted on a similar engine. The test must have been conducted using the same methods specified in NSPS Subpart IIII and these methods must have been followed correctly.
- b. Keeping records of engine manufacturer data indicating compliance with the standards.
- c. Conducting an initial performance test to demonstrate compliance with the emission standards according to the requirements specified in 40 C.F.R. 60.4212, as applicable.

[40 C.F.R. 60.4211(b)(2), (3) & (5), Subpart IIII]

Date: Public Comment - March 31, 2015

Expires: Five Years

22.7. If the Permittee does not install, configure, operate, and maintain EU ID 16 according to the manufacturer's emission-related written instructions, or the Permittee changes emission-related settings in a way that is not permitted by the manufacturer, the Permittee must demonstrate compliance as follows:

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[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)]

[40 C.F.R. 71.6(a)(1)]

[40 C.F.R. 60.4211(g), Subpart IIII]
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a. you must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer.

[40 C.F.R. 60.4211(g)(2), Subpart IIII]

NSPS Subpart IIII Test Methods and Other Procedures

22.8. For EU ID 16, the Permittee must conduct performance tests pursuant to NSPS Subpart IIII according to 40 C.F.R. 60.4212(a) and (d).

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[18 AAC 50.040(a)(2)(OO), (j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)]
[40 C.F.R. 60.4212, Subpart IIII]
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## **Emission Units Subject to Federal NESHAP Subpart A**

**23.** For EU ID 27, 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 2 to NESHAP Subpart HH.

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[18 AAC 50.040(j) & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
[40 C.F.R. 63.764(a) & Table 2, Subpart HH]
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**24.** For EU IDs 7 through 15, 17, and 18, 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 NESHAP Subpart ZZZZ.

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[18 AAC 50.040(j) & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
[40 C.F.R. 63.6665 & Table 8, Subpart ZZZZ]
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## Oil and Gas Production Facilities Subject to Federal NESHAP Subpart HH

25. The Permittee shall comply with the applicable requirements of Subpart HH listed below.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.760(a), Subpart HH]

Date: Public Comment - March 31, 2015

Expires: Five Years

25.1. The owner or operator shall maintain records of the annual facility natural gas or hydrocarbon liquid throughput each year and upon request submit such records to the Administrator. If the facility annual natural gas or hydrocarbon liquid throughput increases above the maximum natural gas or hydrocarbon liquid throughput calculated in 40 C.F.R. 63.760(a)(1)(i)(A) or (a)(1)(i)(B), the maximum natural gas or hydrocarbon liquid throughput must be recalculated using the higher throughput multiplied by a factor of 1.2.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1) & (a)(3)(ii)] [40 C.F.R. 63.760(a)(1)(ii), Subpart HH]

25.2. If the Anna Platform has actual emissions of 5 tons per year or more of a single HAP, or 12.5 tons per year or more of a combination of HAPs (i.e., 50 percent of the major source thresholds), the Permittee shall update its major source determination within 1 year of the prior determination or October 15, 2012, whichever is later, and each year thereafter, using gas composition data measured during the preceding 12 months.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.760(c), Subpart HH]

a. Emissions for major source determination purposes can be estimated using the maximum natural gas or hydrocarbon liquid throughput, as appropriate, calculated in 40 C.F.R. 63.760(a)(1)(i) through (iii). As an alternative to calculating the maximum natural gas or hydrocarbon liquid throughput, the owner or operator of a new or existing source may use the facility's design maximum natural gas or hydrocarbon liquid throughput to estimate the maximum potential emissions. Other means to determine the facility's major source status are allowed, provided the information is documented and recorded to the Administrator's satisfaction in accordance with 40 C.F.R. 63.10(b)(3).

[40 C.F.R. 63.760(a)(1), Subpart HH]

#### NESHAP Subpart HH General Standards

25.3. For EU ID 27, the Permittee shall comply with the following:

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1) & 71.6(a)(3)(i) & (ii)] [40 C.F.R. 63.764(d), Subpart HH]

a. Determine the optimum glycol circulation rate using the equation in 40 C.F.R. 63.764(d)(2)(i).

[40 C.F.R. 63.764(d)(2)(i), Subpart HH]

Expires: Five Years

b. Operate the TEG dehydration unit such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate determined in accordance with Condition 25.3.a. If the TEG dehydration unit is unable to meet the sales gas specification for moisture content using the glycol circulation rate determined in accordance with Condition 25.3.a, the owner or operator must calculate an alternate circulation rate using GRI-GLYCalc<sup>TM</sup>, Version 3.0 or higher. The owner or operator must document why the TEG dehydration unit must be operated using the alternate circulation rate and submit this documentation with the initial notification in accordance with 40 C.F.R. 63.775(c)(7).

[40 C.F.R. 63.764(d)(2)(ii), Subpart HH]

Date: Public Comment - March 31, 2015

c. Maintain a record of the determination specified in Condition 25.3.b in accordance with the requirements in Condition 25.10 and submit the Initial Notification in accordance with the requirements in 40 C.F.R. 63.775(c)(7). If operating conditions change and a modification to the optimum glycol circulation rate is required, the owner or operator shall prepare a new determination in accordance with Condition 25.3.a or 25.3.b and submit the information specified under 40 C.F.R. 63.775(c)(7)(ii) through (v).

[40 C.F.R. 63.764(d)(2)(iii), Subpart HH]

25.4. The Permittee is exempt from the requirements of Condition 25.3 if the criteria listed in Condition 25.4.a or 25.4.b are met, except that the records of the determination of these criteria must be maintained as required in Condition 25.9.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1) & 71.6(a)(3)(ii)] [40 C.F.R. 63.764(e)(1), Subpart HH]

a. The actual annual average flow rate of natural gas to glycol dehydration unit is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in Condition 25.6; or

[40 C.F.R. 63.764(e)(1)(i), Subpart HH]

b. The actual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in Condition 25.7.

[40 C.F.R. 63.764(e)(1)(ii), Subpart HH]

25.5. At all times the Permittee must operate and maintain EU ID 27, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. 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 the source.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.764(j), Subpart HH]

Date: Public Comment - March 31, 2015

Expires: Five Years

NESHAP Subpart HH Test Methods, Compliance Procedures, and Compliance Demonstrations

25.6. The determination of actual flow rate of natural gas to EU ID 27 shall be made using the procedures of either paragraph (b)(1)(i) or (b)(1)(ii) of 40 C.F.R. 63.772.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(i)] [40 C.F.R. 63.772(b)(1), Subpart HH]

25.7. The determination of actual average benzene or BTEX emissions from EU ID 27 shall be made using the procedures of either paragraph (b)(2)(i) or (ii) of 40 C.F.R. 63.772. Emissions shall be determined either uncontrolled, or with federally enforceable controls in place.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(i)] [40 C.F.R. 63.772(b)(2), Subpart HH]

NESHAP Subpart HH Recordkeeping Requirements

25.8. The Permittee shall maintain the records specified in Conditions 25.8.a and 25.8.b.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(ii)] [40 C.F.R. 63.774(b), Subpart HH]

a. The Permittee shall maintain files of all information (including all reports and notifications) required by NESHAP Subpart HH. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or period.

[40 C.F.R. 63.774(b)(1), Subpart HH]

- (i) All applicable records shall be maintained in such a manner that they can be readily accessed.
- (ii) The most recent 12 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request.
- (iii) The remaining 4 years of records may be retained offsite.

(iv) Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

[40 C.F.R. 63.774(b)(1)(i) through (iv), Subpart HH]

b. Records specified in 40 C.F.R. 63.10(b)(2).

[40 C.F.R. 63.774(b)(2), Subpart HH]

Date: Public Comment - March 31, 2015

Expires: Five Years

25.9. If EU ID 27 meets the exemption criteria in Condition 25.4.a or 25.4.b, the Permittee shall maintain the records specified in Condition 25.9.a or 25.9.b, as appropriate.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(ii)] [40 C.F.R. 63.774(d)(1), Subpart HH]

- a. The actual annual average natural gas throughput (in terms of natural gas flow rate to the glycol dehydration unit per day) as determined in accordance with Condition 25.6, or
- b. The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with Condition 25.7.

[40 C.F.R. 63.774(d)(1)(i) & (ii), Subpart HH]

25.10. The Permittee must keep a record of the calculation used to determine the optimum glycol circulation rate in accordance with Condition 25.3.a or 25.3.b, as applicable.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(ii)] [40 C.F.R. 63.774(f), Subpart HH]

25.11. For EU ID 27, the Permittee shall maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The Permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 25.5, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(ii)] [40 C.F.R. 63.774(g), Subpart HH]

#### NESHAP Subpart HH Reporting Requirements

25.12. Whenever a process change is made, or a change in any of the information submitted in the Notification of Compliance Status Report, the Permittee shall submit a report within 180 days after the process change is made. The report shall include:

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)] [40 C.F.R. 63.775(f), Subpart HH]

- a. A brief description of the process change;
- b. A description of any modification to standard procedures or quality assurance procedures;
- c. Revisions to any of the information reported in the original Notification of Compliance Status Report under paragraph (d) of 40 C.F.R. 63.775; and
- d. Information required by the Notification of Compliance Status Report under paragraph (d) of 40 C.F.R. 63.775 for changes involving the addition of processes or equipment.

[40 C.F.R. 63.775(f)(1) through (4), Subpart HH]

Date: Public Comment - March 31, 2015

Expires: Five Years

25.13. All reports required by NESHAP Subpart HH must be sent to the Administrator at the appropriate address listed in 40 C.F.R. 63.13. The Administrator or the delegated authority may request a report in any form suitable for the specific case (e.g., by commonly used electronic media such as Excel spreadsheet, on CD or hard copy).

[18 AAC 50.040(c)(13), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)] [40 C.F.R. 63.764(b) and 63.775(g)(2), Subpart HH]

#### **Engines Subject to Federal NESHAP Subpart ZZZZ**

**26.** For EU IDs 7 through 18, the Permittee shall comply with all applicable requirements of NESHAP Subpart ZZZZ for stationary reciprocating internal combustion engines (RICE) located at an area source of hazardous air pollutant (HAP) emissions.

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.6585, 63.6590, & 63.6590(a), Subpart ZZZZ]

26.1. For EU ID 16, the Permittee must meet the requirements of 40 C.F.R. 63 by meeting the requirements of 40 C.F.R. 60 Subpart IIII. No further requirements apply for EU ID 16 under 40 C.F.R. 63.

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.6590(c), Subpart ZZZZ]

NESHAP Subpart ZZZZ Emission Limitations, Operating Limitations, and Other Requirements

26.2. For EU IDs 14, 15, 17, and 18, the Permittee shall comply with the following:

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[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
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- a. You must meet the following requirements, except during periods of startup:
  - (i) Change oil and filter every 1,000 hours of operation or annually, whichever comes first:
  - (ii) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;

- (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- b. During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- c. Sources have the option to utilize an oil analysis program as described in Condition 26.7 in order to extend the specified oil change requirement in Condition 26.2.a(i).

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

26.3. For EU IDs 7 through 12, the Permittee shall comply with the following:

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

Date: Public Comment - March 31, 2015

Expires: Five Years

- a. You must meet the following requirements, except during periods of startup:
  - (i) Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
  - (ii) Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and
  - (iii) Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.
- b. During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- c. Sources have the option to utilize an oil analysis program as described in Condition 26.8 in order to extend the specified oil change requirement in Condition 26.3.a(i).

[40 C.F.R. 63.6603(a), 63.6625(h), & Table 2d, Item 10, Subpart ZZZZ]

26.4. For EU ID 13, the Permittee shall comply with the following:

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

- a. You must meet the following requirements, except during periods of startup:
  - (i) Change oil and filter every 2,160 hours of operation or annually, whichever comes first:
  - (ii) Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
  - (iii) Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

- b. During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.
- c. Sources have the option to utilize an oil analysis program as described in Condition 26.8 in order to extend the specified oil change requirement in Condition 26.4.a(i).

[40 C.F.R. 63.6603(a), 63.6625(h), & Table 2d, Item 11, Subpart ZZZZ]

# NESHAP Subpart ZZZZ General Requirements

26.5. For EU IDs 7 through 15, 17, and 18, the Permittee shall comply with the following:

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[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
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Date: Public Comment - March 31, 2015

Expires: Five Years

a. You must be in compliance with the emission limitations, operating limitations, and other requirements in NESHAP Subpart ZZZZ that apply to you at all times.

[40 C.F.R. 63.6605(a), Subpart ZZZZ]

b. At all times you must operate and maintain any affected source, 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 you to make 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 the source.

[40 C.F.R. 63.6605(b), Subpart ZZZZ]

NESHAP Subpart ZZZZ Monitoring, Installation, Collection, Operation, and Maintenance Requirements

26.6. For EU IDs 7 through 15 and 18, the Permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.6625(e), Subpart ZZZZ] plan for the engine.

26.7. For EU IDs 14, 15, 17, and 18, the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 26.2.a. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 26.2.a. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil

changes for the engine. The analysis program must be part of the maintenance

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.6625(i), Subpart ZZZZ]

Date: Public Comment - March 31, 2015

Expires: Five Years

26.8. For EU IDs 7 through 13, the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Conditions 26.3.a and 26.4.a. The oil analysis must be performed at the same frequency specified for changing the oil in Conditions 26.3.a and 26.4.a. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee must change the oil within 2 business days or before commencing operation, whichever is later. The Permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

> [18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 63.6625(j), Subpart ZZZZ]

NESHAP Subpart ZZZZ Requirements for Demonstration of Continuous Compliance with Emission Limitations, Operating Limitations, and Other Requirements

26.9. For EU IDs 7 through 15, 17, and 18, the Permittee shall comply with the following:

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(1)]

Date: Public Comment - March 31, 2015

Expires: Five Years

a. You must demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Conditions 26.2, 26.3, and 26.4 according to methods specified in Condition 26.9.a(i) or 26.9.a(ii).

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

- (i) Operate and maintain the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
- (ii) Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[Table 6, Item 9, Subpart ZZZZ]

b. You must also report each instance in which you did not meet the requirements in Table 8 to NESHAP Subpart ZZZZ that apply to you.

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

NESHAP Subpart ZZZZ Reporting Requirements

26.10. For EU IDs 7 through 15, 17, and 18, the Permittee must report all deviations as defined in NESHAP Subpart ZZZZ in the semiannual monitoring report required by Condition 59.

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)] [40 C.F.R. 63.6650(f), Subpart ZZZZ]

NESHAP Subpart ZZZZ Recording Requirements

26.11. For EU IDs 7 through 15, 17, and 18, the Permittee shall comply with the following:

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(ii)]

a. You must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that you operated and maintained the stationary RICE and after-treatment control device (if any) according to your own maintenance plan.

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

b. Your records must be in a form suitable and readily available for expeditious review according to 40 C.F.R. 63.10(b)(1).

[40 C.F.R. 63.6660(a), Subpart ZZZZ]

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c. As specified in 40 C.F.R. 63.10(b)(1), you must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

[40 C.F.R. 63.6660(b), Subpart ZZZZ]

d. You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 C.F.R. 63.10(b)(1).

[40 C.F.R. 63.6660(c), Subpart ZZZZ]

# **General Federal Requirements**

**27. Asbestos NESHAP.** The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145, 61.150, and 61.152 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), & 50.326(j)] [40 C.F.R. 61, Subparts A & M, and Appendix A]

# 28. Protection of Stratospheric Ozone, 40 C.F.R. 82

# **Subpart F – Recycling and Emissions Reduction**

28.1. **Refrigerant Recycling and Disposal.** The Permittee shall comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F.

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

# Subpart G – Significant New Alternatives Policy

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

[18 AAC 50.040(d)] [40 C.F.R. 82.174(b) through (d), Subpart G]

# **Subpart H – Halon Emissions Reduction**

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

 $[18 \ AAC \ 50.040(d)] \\ [40 \ C.F.R. \ 82.270(b) \ through \ (f), \ Subpart \ H]$ 

- 29. 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) and 63.10(b)(3). 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).
  - 29.1. After the effective date of any relevant standard promulgated by the Administrator under this part, an owner or operator who constructs a new affected source that is not major-emitting or reconstructs an affected source that is not major-emitting that is subject to such standard, or reconstructs a source such that the source becomes an affected source subject to the standard, must notify the Administrator and the Department of the intended construction or reconstruction. The notification must be submitted in accordance with the procedures in §63.9(b).

[18 AAC 50.040(c)(1), 50.040(j), & 50.326(j)][40 C.F.R. 71.6(a)(3)(ii)] [40 C.F.R. 63.1(b), 63.5(b)(4), 63.6(c)(1), & 63.10(b)(3)]

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#### NSPS and NESHAP Reports. The Permittee shall: **30.**

- 30.1. **Reports:** Attach to the operating report required by Condition 59 for the period covered by the report, a copy of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10, unless previously submitted to the Department; and
- 30.2. 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 U.S. EPA issued monitoring waiver or custom monitoring schedule with the permit.

[18 AAC 50.326(j)(4) & 50.040(j)] [40 C.F.R. 60.13, 63.10(d) & (f), & 71.6(c)(6)]

# Section 5. General Conditions

#### **Standard Terms and Conditions**

**31.** 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), 50.345(a) & (e)]

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**32.** 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), 50.345(a) & (f)]

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

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

**34. 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), 50.400, 50.403, & 50.405] [AS 37.10.052(b) & AS 46.14.240]

- **35. 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. The quantity for which fees will be assessed is the lesser of
  - 35.1. the stationary source's assessable potential to emit of 744 TPY; or
  - 35.2. 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)]

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

- 36.1. 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., 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
- 36.2. 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 35.1.

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

- **37. Good Air Pollution Control Practice.** The Permittee shall do the following for EU IDs 2 and 19:
  - 37.1. perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
  - 37.2. keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
  - 37.3. keep a copy of either the manufacturer's or the operator's maintenance procedures.

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

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**38. 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)]

**39. 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.

[18 AAC 50.045(d), 50.040(e), 50. 326(j)(3), & 50.346(c)]

- 39.1. The Permittee shall keep records of
  - a. complaints received by the Permittee and complaints received by the Department and conveyed to the Permittee; and
  - b. any additional precautions that are taken
    - (i) to address complaints described in Condition 39.1 or to address the results of Department inspections that found potential problems; and
    - (ii) to prevent future dust problems.
- 39.2. The Permittee shall report according to Condition 41.

40. **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 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.

[18 AAC 50.055(g)]

41. 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, 50.040(e), 50.326(i)(3), & 50.346(a)] [40 C.F.R. 71.6(a)(3)]

- Monitoring, Recordkeeping, and Reporting for Condition 41: 41.1.
  - If emissions present a potential threat to human health or safety, the a. Permittee shall report any such emissions according to Condition 58.
  - As soon as practicable after becoming aware of a complaint that is b. 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 41.
- 41.2. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
  - after an investigation because of a complaint or other reason, the Permittee a. believes that emissions from the stationary source have caused or are causing a violation of Condition 41; or
  - the Department notifies the Permittee that it has found a violation of b. Condition 41.
- 41.3. The Permittee shall keep records of
  - the date, time, and nature of all emissions complaints received; a.
  - b. the name of the person or persons that complained, if known;
  - a summary of any investigation, including reasons the Permittee does or c. does not believe the emissions have caused a violation of Condition 41; and
  - d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.
- With each operating report under Condition 59, the Permittee shall include a brief 41.4. summary report which must include
  - the number of complaints received; a.
  - the number of times the Permittee or the Department found corrective action b. 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.
- 41.5. 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.
- **42. 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>8</sup> listed in Condition 20, 21, 22, or 28 (refrigerants), the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting under Condition 58 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under Condition 58.

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

# **Open Burning Requirements**

**43. Open Burning.** The Permittee shall not conduct open burning at the stationary source.

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

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<sup>8</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.

# Section 6. General Source Testing and Monitoring Requirements

**44. 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) & 50.345(a) & (k)]

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

[18 AAC 50.220(b)]

Expires: Five Years

- 45.1. at a point or points that characterize the actual discharge into the ambient air; and
- 45.2. 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.
- **46. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:
  - 46.1. 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) & 50.040(a)] [40 C.F.R. 60]

46.2. Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 61.

[18 AAC 50.040(b) & 50.220(c)(1)(B)] [40 C.F.R. 61]

46.3. 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) & 50.220(c)(1)(C)] [40 C.F.R. 63]

46.4. 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 and may use the form in Section 11 to record data.

[18 AAC 50.030 & 50.220(c)(1)(D)]

46.5. 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) & 50.220(c)(1)(E)] [40 C.F.R. 60, Appendix A]

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46.6. 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) & 50.220(c)(1)(F)] [40 C.F.R. 51, Appendix M]

46.7. 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) & 50.220(c)(2)] [40 C.F.R. 63, Appendix A, Method 301]

**47. 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) & 50.990(102)]

**48. Test Exemption.** The Permittee is not required to comply with Conditions 50, 51 and 52 when the exhaust is observed for visible emissions by Method 9 Plan (Condition 2.1) or Smoke/No Smoke Plan (Condition 2.2).

[18 AAC 50.345(a)]

**49. 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)]

**50. Test Plans.** Except as provided in Condition 48, 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 44 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)]

**51. Test Notification.** Except as provided in Condition 48, 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)]

**Test Reports.** Except as provided in Condition 48, 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 55. 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)]

**53. Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in Conditions 6 and 11.2, the three-hour average is determined using the average of three one-hour test runs.

[18 AAC 50.220(f)]

# Section 7. General Recordkeeping and Reporting Requirements Recordkeeping Requirements

**54. 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) & 50.326(j)] [40 C.F.R 60.7(f), Subpart A, 40 C.F.R 71.6(a)(3)(ii)(B)]

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- 54.1. Copies of all reports and certifications submitted pursuant to this section of the permit; and
- 54.2. 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**

- **55. 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.
  - 55.1. 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 55.1.a, that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.

[18 AAC 50.345(a) & (j), 50.205, & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)(A)] **56. 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, emission source test reports, or other records under a

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

Date: Public Comment - March 31, 2015

Expires: Five Years

57. 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), 50.200, & 50.326(a) & (j)] [40 C.F.R. 71.5(a)(2) & 71.6(a)(3)]

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

cover letter certified in accordance with Condition 55.

- 58.1. Except as provided in Condition 41, 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 nonroutine 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 of the end of the month in which the excess emissions or deviation occurred, except as provided in Conditions 58.1.c(ii) and 58.1.c(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 58.1.c(i); and
    - (iii) for failure to monitor, as required in other applicable conditions of this permit.

- 58.2. When reporting excess emissions or permit deviations, the Permittee shall report using either the Department's on-line form, which can be found at <a href="http://www.dec.state.ak.us/air/ap/site.htm">http://www.dec.state.ak.us/air/ap/site.htm</a>, or if the Permittee prefers, the form contained in Section 13 of this permit. The Permittee must provide all information
- 58.3. 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), 50.326(j)(3), & 50.346(b)(2) & (3)]

Date: Public Comment - March 31, 2015

Expires: Five Years

- **59. Operating Reports.** During the life of this permit<sup>9</sup>, the Permittee shall submit to the Department an original and one copy of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.
  - 59.1. The operating report must include all information required to be in operating reports by other conditions of this permit.
  - 59.2. If excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 59.1,
    - a. The Permittee shall identify

called for by the form that is used.

- (i) the date of the deviation;
- (ii) the equipment involved;
- (iii) the permit condition affected;
- (iv) a description of the excess emissions or permit deviation; and
- (v) any corrective action or preventive measures taken and the date of such actions; or
- b. When excess emissions or permit deviations have already been reported under Condition 58 the Permittee shall cite the date or dates of those reports.
- 59.3. The operating report must include a listing of emissions monitored under Conditions 2.1.e and 2.2.c 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;
  - c. the permit condition affected; and
  - d. the monitoring result which triggered the additional monitoring.

-

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.

59.4. **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.

[18 AAC 50.346(a) & 50.326(j)] [40 C.F.R. 71.6(a)(3)(iii)(A)]

Expires: Five Years

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- **60. 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>10</sup>.
  - 60.1. 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;
  - 60.2. **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.
  - 60.3. 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, 50.345(a) & (j), & 50.326(j)] [40 C.F.R. 71.6(c)(5)]

- **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 14 of this permit, as follows:
  - 61.1. Every third year by March 31 if the stationary source's potential to emit emissions for the previous calendar year exceed:
    - a. 5 tons per year of lead (Pb), 1000 TPY of CO; or
    - b. 100 TPY of SO<sub>2</sub>, NH<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>X</sub> or VOCs.
  - 61.2. The Permittee shall commence reporting in 2015 for the calendar year of 2014, 2018 for calendar year 2017, etc.

<sup>10</sup> See Condition 60.2 for clarification on the number of reports required.

61.3. Include in the report required by this condition, the required data elements contained within the form in Section 14 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) &18 AAC 50.200] [40 C.F.R. 51.15, 51.30(a)(1) & (b)(1); & 40 C.F.R. 51, Appendix A to Subpart A]

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# Section 8. Permit Changes and Renewal

- **62. Permit Applications and Submittals.** The Permittee shall comply with the following requirements for submitting application information to the EPA Region 10:
  - 62.1. 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>11</sup>;
  - 62.2. The information shall be submitted to the same address as in Condition 60.3.
  - 62.3. 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
  - 62.4. The Permittee shall maintain records as necessary to demonstrate compliance with this condition.

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

Date: Public Comment - March 31, 2015

Expires: Five Years

**63. 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) & 50.326(j)] [40 C.F.R. 71.6(a)(8)]

- **64. 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. Part 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:
  - 64.1. Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition;
  - 64.2. 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;
  - 64.3. The change shall not qualify for the shield under 40 C.F.R. 71.6(f);

<sup>&</sup>lt;sup>11</sup> The documents required in Condition 62.1 are submitted to the Department's Anchorage office. The current address for the Anchorage office is: ADEC, 619 East Ship Creek, Suite 249, Anchorage, AK 99501.

64.4. 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.

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

Date: Public Comment - March 31, 2015

Expires: Five Years

- **Operational Flexibility.** The Permittee may make Section 502(b)(10)<sup>12</sup> 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):
  - 65.1. The Permittee shall provide EPA and the Department with a notification no less than 7 days in advance of the proposed change.
  - 65.2. For each such change, the written notification required above 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.
  - 65.3. The permit shield described in 40 C.F.R. 71.6(f) shall not apply to any change made pursuant to Condition 65.

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

**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), 50.326(c)(2) & (j)(2)] [40 C.F.R. 71.5(a)(1)(iii) & 71.7(b) & (c)(1)(ii)]

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<sup>&</sup>lt;sup>12</sup> As defined in 40 C.F.R. 71.2, Section 502(b)(10) changes are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

# Section 9. Compliance Requirements

# **General Compliance Requirements**

- **67.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are
  - 67.1. included and specifically identified in the permit; or
  - 67.2. determined in writing in the permit to be inapplicable.

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

Date: Public Comment - March 31, 2015

Expires: Five Years

- **68.** The Permittee must comply with each permit term and condition.
  - 68.1. For applicable requirements with which the stationary source is in compliance, the Permittee shall continue to comply with such requirements.
  - 68.2. 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), 326(j) & 50.345(a) & (c)] [40 C.F.R. 71.6(c)(3) & 71.5(c)(8)(iii)(A)]

**69.** 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) & 50.345(a) & (d)]

- **70.** 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
  - 70.1. enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;
  - 70.2. have access to and copy any records required by the permit;
  - 70.3. inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
  - 70.4. sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

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

**71.** 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 stationary source.

- **72.** Nothing in this permit shall alter or affect the following:
  - 72.1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; or
  - 72.2. 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)]

Date: Public Comment - March 31, 2015

Expires: Five Years

73. Table C 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 C becomes applicable during the permit term, the Permittee shall comply with such requirements on a timely basis including, but not limited to, providing appropriate notification to EPA, obtaining a construction permit and/or an operating permit revision.

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

**Table C - Permit Shields Granted** 

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
All existing emission units	40 C.F.R. 60, Subparts B, C, Cb, Cc, Cd, Ce, D, Da, Db, Dc, E, Ea, Eb, Ec, F, G, Ga, H, I, J, Ja, K, Ka, Kb, L, M, N, Na, O, P, Q, R, S, T, U, V, W, X, Y, Z	No existing emission unit is an "affected facility" at the issue date of this permit.
All existing emission units	40 C.F.R. 60, Subparts AA, AAa, BB, CC, DD, EE, HH, KK, LL, MM, NN, PP, QQ, RR, SS, TT, UU, VV, VVa, WW, XX, AAA, BBB, DDD, FFF, GGG, GGGa, HHH, III, JJJ, KKK, LLL, NNN, OOO, PPP, QQQ, RRR, SSS, TTT, UUU, VVV, WWW, AAAA, BBBB, CCCC, DDDD, EEEE, FFFF, LLLL, MMMM and OOOO	No existing emission unit is an "affected facility" at the issue date of this permit.
2	40 C.F.R. 60 Subpart GG	Turbine has not been modified or reconstructed after October 3, 1977.
3, 4, 5	40 C.F.R. 60 Subpart GG, §60.334(a) through (g)	Turbines do not use a continuous emissions monitoring system (CEMS) or water/steam injection.
3, 4, 5	40 C.F.R. 60 Subpart GG, §60.334(h)(2)	No fuel bound nitrogen allowance is claimed for the turbines so nitrogen content of the fuel does not have to be monitored.
14, 15, 17, 18	40 C.F.R. 60 Subpart IIII	Engines have not been modified or reconstructed after July 11, 2005.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability			
16	40 C.F.R. 60 Subpart IIII, §§60.4204(b) and (c), 60.4205, 60.4207, 60.4209, 60.4211(c) and (d), 60.4213, 60.4214	The engine has a displacement less than 10 liters per cylinder, was manufactured after April 1, 2006 but before the 2007 model year, is a certified engine, is not a fire pump engine or an emergency engine and is not equipped with a particulate filter, and is located in an area of Alaska not accessible by the FAHS.			
7 through 13	40 C.F.R. 60 Subpart JJJJ	Engines have not been modified or reconstructed after June 12, 2006.			
2, 3, 4, 5	40 C.F.R. 60 Subpart KKKK	Turbines have not been modified or reconstructed after February 18, 2005.			
All existing emission units	40 C.F.R. 61, Subparts B, C, D, E, F, H, I, J, K, L, N, O, P, Q, R, T, V, W, Y, BB, and FF	No existing emission unit is an "affected facility" at the issue date of this permit.			
All existing emission units	40 C.F.R. 63, Subparts B, F, G, H, I, J, L, M, N, O, Q, R, S, T, U, W, X, Y, AA, BB, CC, DD, EE, GG, HH, II, JJ, KK, LL, MM, OO, PP, QQ, RR, SS, TT, UU, VV, WW, XX, YY, CCC, DDD, EEE, GGG, III, JJJ, LLL, MMM, NNN, OOO, PPP, QQQ, RRR, TTT, UUU, VVV, XXX, AAAA, CCCC, DDDD, EEEE, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK, MMMM, NNNN, OOOO, PPPP, QQQQ, RRRR, SSSS, TTTT, UUUU, VVVV, WWWW, XXXX, YYYY, AAAAA, BBBBB, CCCCC, DDDDD, EEEEE, FFFFF, GGGGG, HHHHH, IIIII, JJJJJ, KKKKK, LLLLL, MMMMM, NNNNN, PPPPP, QQQQQ, RRRRR, SSSSS, TTTTT, UUUUU, WWWWW, YYYYY, ZZZZZ, BBBBBB, CCCCCC, DDDDDD, EEEEEE, FFFFFF, GGGGGG, HHHHHH, LLLLLLL, MMMMMM, NNNNN, OOOOOO, PPPPPP, QQQQQQ, RRRRR, SSSSSS, TTTTTT, VVVVVV, WWWWWW, XXXXXXXX, YYYYYYY, and ZZZZZZ	No existing emission unit is an "affected facility" at the issue date of this permit.			
All existing emission units	40 C.F.R. 63, Subparts AAAAAAA, BBBBBBB, CCCCCCC, DDDDDDD, EEEEEEE, and HHHHHHH	No existing emission unit is an "affected facility" at the issue date of this permit.			
27	40 C.F.R. 63 Subpart HH, §63.762	The affirmative defense provisions of Subpart HH (40 C.F.R. 63.762) do not apply to EU ID 27 because there are no applicable emission standard, add-on controls, or work practices; therefore, the records are not pertinent to compliance.			
27	40 C.F.R. 63 Subpart HH, §63.764(c), (d), and (f) through (i)	The non-applicability of 63.764 (all except 63.764(a), (b), and (j)) is indicated under 63.764(d) and 63.764(e)(1).			

EU ID	Non-Applicable Requirements	Reason for Non-Applicability			
27	40 C.F.R. 63 Subpart HH, §§63.765, 63.766, 63.771, 63.772(a) and (c) through (i), 63.773, 63.774(c), (e), (h) and (i), 63.775(b) through (e)	The non-applicability is indicated under 63.764(d) and (e)(1). No control of emissions is required by the subpart.			
27	40 C.F.R. 63 Subpart HH §63.769	Anna Platform is not a gas processing facility.			
27	40 C.F.R. 63 Subpart HHH	Anna Platform is not a major source of HAPs.			
7 through 13	40 C.F.R. Part 63 Subpart ZZZZ, §§63.6600, 63.6601, 63.6602, 63.6610, 63.6611, 63.6625(d), 63.6645(b)-(f), operating limits under Table 2b	Anna Platform is not a major source of HAP emissions.			
7 through 13	40 C.F.R. Part 63 Subpart ZZZZ, §§63.6612, 63.6615, 63.6620, 63.6625(a)-(c), (f), 63.6630, 63.6635, 63.6640(f), 63.6645(g), (h), 63.6650(a)-(e), (g) and (h), 63.6655(a)-(c), (f)	Engines are not emergency engines, are subject only to maintenance practices and need not perform monitoring or performance tests, nor use CEMS, or CPMS. Anna Platform will not use landfill/digester gas.			
14, 15, 17, 18	40 C.F.R. Part 63 Subpart ZZZZ, §§63.6600, 63.6601, 63.6602, 63.6610, 63.6611, 63.6645(b)-(h), operating limits under Table 2b	Anna Platform is not a major source of HAPs emissions.			
14, 15, 17, 18	40 C.F.R. Part 63 Subpart ZZZZ, §§63.6604, 63.6612, 63.6615, 63.6620, 63.6625(g), 63.6630, 63.6635, 63.6640(b), (d), 63.6650(a)-(e), 63.6655(a), (d), Table 2d, Item 2 and Item 3	Anna Platform is not accessible by the FAHS.			
14, 15, 17, 18	40 C.F.R. Part 63 Subpart ZZZZ, §§63.6625(a)-(d), (f), 63.6640(f), 63.6650(g), (h), 63.6655(b), (c), (f)	Anna Platform will not use CEMS, CPMS, landfill/digester gas, and the engine is not classified as an emergency engine.			
All existing emission units	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.			
All existing emission units	40 C.F.R. 82.30, Subpart B – Servicing of Motor Vehicle Air Conditioners	Stationary source does not service motor vehicle air conditioners.			
All existing emission units	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.			
All existing emission units	40 C.F.R. 82.80, Subpart D – Federal Procurement	Subpart applies only to Federal Departments, agencies, and instrumentalities.			
All existing emission units	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			

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
All existing emission units	40 C.F.R. 82.158, Subpart F – Recycling and Emissions Reduction	Stationary source does not manufacture or import recovery and recycling equipment
All existing emission units	40 C.F.R. 82.160, Approved Equipment Testing Organizations	Stationary source does not contract equipment testing organizations to certify recovery and recycling equipment.
All existing emission units	40 C.F.R. 82.164, Reclaimer Certification	Stationary source does not sell reclaimed refrigerant.
All existing emission units	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 party entity that certifies recovery equipment.
All existing emission units	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.
All existing emission units	40 C.F.R. 82.174(a), Subpart G – Significant New Alternatives Policy Program: Prohibitions	Stationary source does not manufacture substitute chemicals or products for ozone-depleting compounds.
All existing emission units	40 C.F.R. 82.270(a), Subpart H – Halon Emissions Reduction	Stationary source does not manufacture halon.
All existing emission units	40 C.F.R. 82.304, Subpart I – Ban on Refrigeration and Air-Conditioning Appliances Containing HCFCs	Stationary source does not sell or distribute any identified banned products.
Nonroad (mobile) internal combustion engines	18 AAC 50.055(a)(1) – Fuel-Burning Equipment Emission Standards; Visible Emissions	Nonroad (mobile) internal combustion engines are not included in the definition of fuel-burning equipment (18 AAC 50.990).
All existing emission units	18 AAC 50.055(a)(2), Fuel-Burning equipment standards, opacity emission limit of 30 percent, 3-minute average	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.055(a)(4), (5), and (8), Fuelburning equipment standards, opacity emission limit of 20 percent, 6-minute average	No affected emission units within the permitted stationary source.

Date: Public Comment - March 31, 2015

Expires: Five Years

Date: Public Comment - March 31, 2015

Expires: Five Years

#### 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 form 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."

- 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.
- Stationary Source 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.

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- 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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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:

The wt%  $S_{\text{fuel}}$ , wt%  $C_{\text{fuel}}$ , and wt%  $H_{\text{fuel}}$  are equal to the weight percent's 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 10.1. The fuel weight percent's 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%  $S_{\text{fuel}} = 1.0\%$ , then enter 1.0 into the equations not 0.01 and if vol% $_{\text{dry}}O_2$ , exhaust = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.346(c)]

Date: Public Comment - March 31, 2015

Expires: Five Years

# Date: Public Comment - March 31, 2015 Anna Platform Expires: Five Years Section 13. ADEC Notification Form<sup>13</sup> Anna Platform AQ0062TVP03 **Stationary Source Name** Air Quality Permit No. Hilcorp Alaska, LLC Company Name Date When did you discover the Excess Emissions/Permit Deviation? / / Time: :/ When did the event/deviation occur? Begin Date: Time: \_\_\_\_ : \_\_\_\_ (Use 24-hr clock.) Time: : (Use 24-hr clock.) End Date 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 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 Continuous or (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
I			

<sup>&</sup>lt;sup>13</sup> Revised as of August 20, 2008.

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(e) Type of Incident (please check only one):				
Opacity %				
☐ Fugitive Emissions ☐ Emission Limit Exceeded ☐ Other				
Marine Vessel Opacity Flaring				
(f) Unavoidable Emissions:				
Do you intend to assert that these excess emissions were Yes No unavoidable?				
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) Downit Deviction Type (about only one boy compounding with the section in the normality				
(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				
☐ Recording/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 <u>as in the permit.</u> 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.

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#### (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

If faxed or emailed, the report must be certified within the Operating Report required for the same reporting period per Condition 59.

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: <a href="https://myalaska.state.ak.us/dec/air/airtoolsweb/">https://myalaska.state.ak.us/dec/air/airtoolsweb/</a>

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

[18 AAC 50.346(b)(3)]

Permit No. AQ0062TVP03 Anna Platform

# Section 14. Emission Inventory Form

ADEC Reporting Form Emission Inventory Reporting			Emission Inventory Year-[]
State of Alaska Departmen	t of E	nvironmental Conservation	
Division of Air Quality			
<u>Mandatory</u>	inforn	nation is highlighted. Make additional	copies as needed.
Inventory start date:			
Inventory end date:			
Inventory Type:			
		<b>Facility Information:</b>	
ADEC Stationary Source	e ID:		
(Stationary Source) Facility Name:			
AFS	S ID:		
Census Area/ Commu	nity:		
Line of Business (NAI	(CS):		
<b>Contact/Owner Name:</b>			
<b>Contact Owner Address:</b>			
Contact/Owner Phone Number:			
Facility Physical Address:			
		Lat: Long:	
Mailing Address:			

Emission Unit:	
ID:	
Description:	
Manufacturer:	
Model Number:	
Serial Number:	
Year of Manufacture:	
Maximum Nameplate Capacity:	
Design Capacity (BTU/hr):	

Control Equipment (List All):	
	Control Equipment Type(Primary or Secondary):
	ID:
	Type:
	Manufacturer:
	Model:
	Control Efficiency (%):
	Capture Efficiency (%):
	Total Capture Efficiency (%):
	Pollutants Controlled
	-

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

Hours/Day of Operation:
Hours/Year of Operation:

Expires: Five Years

Date: Public Comment - March 31, 2015

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

Stack Description:				
	Stack Detail:			
	ID:			
	Type:			
	Measurement Units:			
	Base Elevation:			
	Stack Height:			
	Stack Diameter:			
	Exit Gas Temp:			
	Exit Gas Velocity:			
	Actual Exit Gas Flow Rate:			
	Data Source:			
	Description:			
	Latitude:			
	Longitude:			
	<b>Location Description:</b>			
	Accuracy (m):			

#### **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; or
- 3. Mail to: **ADEC**

Air Permits Program

410 Willoughby Ave., Suite 303

PO Box 111800

Juneau, AK 99801-1800

Or

4. Submission of information can be made via a full electronic batch submittal (XML files). This will require each data element to be tagged with XML (Extensible Markup Language) code before it can be uploaded to ADEC database.

https://myalaska.state.ak.us/dec/air/airtoolsweb/EiXmlValidator.aspx

[18 AAC 50.346(b)(9)]

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