

# DEPARTMENT OF ENVIRONMENTAL CONSERVATION

## AIR QUALITY OPERATING PERMIT

Permit No. AQ0066TVP03

Issue Date: Public Comment - July 09, 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 **Granite Point 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 April 17, 2015 Register 214. 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 AQ0066TVP02, including all revisions, expires.

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

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John F. Kuterbach, Manager  
Air Permits Program

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### List of Abbreviations Used in this Permit

AAC.....	Alaska Administrative Code	NAICS.....	North American Industry Classification System
ADEC .....	Alaska Department of Environmental Conservation	NESHAPs.....	Federal National Emission Standards for Hazardous Air Pollutants [NESHAPs as contained in 40 C.F.R. 61 and 63]
AS .....	Alaska Statutes	NO <sub>x</sub> .....	nitrogen oxides
ASTM .....	American Society for Testing and Materials	NSPS .....	Federal New Source Performance Standards [NSPS as contained in 40 C.F.R. 60]
BACT .....	Best Available Control Technology	O & M .....	operation and maintenance
BHp .....	boiler horsepower	O <sub>2</sub> .....	oxygen
C.F.R. ....	Code of Federal Regulations	PAL .....	Plantwide Applicability Limitation
The Act .....	Clean Air Act	PM-10 .....	particulate matter less than or equal to a nominal 10 microns in diameter
CO .....	carbon monoxide	PM-2.5.....	particulate matter less than or equal to a nominal 2.5 microns in diameter
dscf .....	dry standard cubic foot	ppm .....	parts per million
EPA .....	US Environmental Protection Agency	ppmv, ppmvd .....	parts per million by volume on a dry basis
EU.....	emission unit	psia .....	pounds per square inch (absolute)
gr./dscf.....	grain per dry standard cubic foot (1 pound = 7000 grains)	PSD .....	Prevention of Significant Deterioration
GPH.....	gallons per hour	PTE .....	potential to emit
HAPs .....	Hazardous Air Pollutants [HAPs as defined in AS 46.14.990]	SIC. ....	Standard Industrial Classification
hp .....	horsepower	SO <sub>2</sub> .....	sulfur dioxide
ID.....	emission unit identification number	TPH.....	tons per hour
kPa .....	kiloPascals	TPY .....	tons per year
LAER.....	Lowest Achievable Emission Rate	VOC .....	volatile organic compound [VOC as defined in 40 C.F.R. 51.100(s)]
lb/hr .....	pounds per hour	VOL .....	volatile organic liquid [VOL as defined in 40 C.F.R. 60.111b, Subpart Kb]
MACT .....	Maximum Achievable Control Technology [MACT as defined in 40 C.F.R. 63]	vol% .....	volume percent
MMBtu/hr.....	million British thermal units per hour	wt% .....	weight percent
MMscf .....	million standard cubic feet		
MR&R .....	monitoring, recordkeeping, and reporting		
NA .....	not applicable		

## Section 1. Stationary Source Information

### Identification

Permittee:	<b>Hilcorp Alaska, LLC</b> 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503	
Stationary Source Name:	<b>Granite Point Platform</b>	
Location:	60° 57' 30" North; 151° 19' 53" West	
Physical Address:	Upper Cook Inlet, AK	
Owner/Operator	<b>Hilcorp Alaska, LLC</b> 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:	Dave Wilkins, Senior Vice President 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8397 dwilkins@hilcorp.com	
Fee and Permit Contact:	Dave Wilkins, Senior Vice President 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8397 dwilkins@hilcorp.com	
Process Description:	SIC Code	1311 - Crude Petroleum and Natural Gas
	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)]

## Section 2. Emission Unit Inventory and Description

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

**Table A - Emission Unit Inventory <sup>1</sup>**

EU ID	Tag Number	Emission Unit Name	Emission Unit Description	Fuel Type	Rating/ Size	Installation or Construction Date
1	P-PM-1270	Solar Centaur H-5700 Turbine	Compressor Drive	Fuel Gas	5,700 hp	1994
2	P-PM-1500	Solar T-1200 Turbine	AC Generator Drive	Fuel Gas	1,200 hp	1994
3	P-PM-1510	Solar T-1200 Turbine	AC Generator Drive	Fuel Gas	1,200 hp	1994
4	P-CR-4180	Caterpillar 3406B Engine	East Crane Engine	Diesel	420 hp	1995
5	P-CR-4190	Detroit Diesel 140 Engine	West Crane Engine	Diesel	210 hp	1995
6	P-PM-1520	Caterpillar D-399 Engine	Emergency Generator Drive	Diesel	1,050 kW	1991
12	P-SP-LP	Flare (LP) & Flare Pilot (LP)	Safety Flare & Pilot (SW)	Fuel Gas	61 MMscfd (Total)	1969
13	P-SP-HP	Flare (HP) & Flare Pilot (HP)	Safety Flare & Pilot (SE)	Fuel Gas		1969
14	P-B-0550	Bryan L48-W-G Boiler	Steam Boiler #1	Fuel Gas	3.2 MMBtu/hr	1990
15	P-B-0560	Bryan L48-W-G Boiler	Steam Boiler #2	Fuel Gas	3.2 MMBtu/hr	1990
18	P-PM-0120	Clarke Model IK6H-UF80	Firewater Pump Engine	Diesel	275 hp	2003
20	P-PM-0100	Cat 3304 FWP Engine	Firewater Pump Engine	Diesel	135 hp	1996

Notes:

<sup>1</sup> EUs 7 through 10, 11, 16, 17, and 19 have been removed from the platform.

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

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

#### **Visible Emissions Standards**

- 1. Industrial Process and Fuel-Burning Equipment Visible Emissions.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 1 through 6, 12 through 15, 18, and 20 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)]

- 1.1. For EU IDs 4 and 6, monitor, record and report in accordance with Conditions 2 through 4.
- 1.2. For EU IDs 1 through 3, 14, and 15, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 58 whether each of these emission units fired only gas during the period covered by the report. Report under Condition 57 if any fuel is burned other than gas.
- 1.3. For EU IDs 5 and 20, if actual emissions remain less than the thresholds in 18 AAC 50.326(e), monitor, record, and report in accordance with Condition 13.4. Otherwise, monitor, record, and report in accordance with Conditions 2 through 4 for the duration of the permit term.
- 1.4. For EU ID 18, as long as the emission unit does not exceed the limit in Condition 10, monitoring shall consist of an annual compliance certification under Condition 59 with the visible emissions standard. Otherwise, monitor, record, and report in accordance with Conditions 2 through 4 for the duration of the permit term.
- 1.5. For EU IDs 12 and 13, 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 4 through 6, 18, and 20)***

- 2. Visible Emissions Monitoring.** When required by any of Conditions 1.1, 1.3, and 1.4, or in the event of replacement during the permit term, the Permittee shall observe the exhaust of EU IDs 4 through 6, 18, and 20 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) Except as provided in Condition 2, for EU IDs 4 and 6, observe exhaust for 18 minutes within six months after the issue date of this permit.
  - (ii) For EU ID 18, observe exhaust for 18 minutes within 30 days after the calendar month during which the limit in Condition 10 was exceeded or within 30 days of the unit's next scheduled operations, whichever is later.
  - (iii) For EU IDs 5 and 20, observe exhaust for 18 minutes within 30 days after the calendar month during which the threshold in Condition 1.3 was exceeded or within 30 days of the unit's next scheduled operations, whichever is later.
  - (iv) For any unit, observe exhaust for 18 minutes within 14 calendar days after changing from the Smoke/No-Smoke Plan of Condition 2.2.
  - (v) For any unit replaced during the term of this permit, observe exhaust for 18 minutes within 30 days of startup.
- 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 any of Conditions 1.1, 1.3, and 1.4, or in the event of replacement of any of EU IDs 4 through 6, 18 and 20 during the permit term, 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;
  - (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:
- the date and time of the observation;
  - from Table A, the ID of the emission unit observed;
  - whether visible emissions are present or absent in the exhaust;
  - a description of the background to the exhaust during the observation;
  - if the emission unit starts operation on the day of the observation, the startup time of the emission unit;
  - name and title of the person making the observation; and
  - operating mode (load or fuel consumption rate).
4. **Visible Emissions Reporting.** When required by any of Conditions 1.1, 1.3, and 1.4 or in the event of replacement of any of EU IDs 4 through 6, 18, and 20 during the permit term, 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)]
- 4.1. Include in each operating report under Condition 58 for the period covered by the report:
- 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;
  - for each emission unit under the Method 9 Plan,
    - 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
    - a summary to include:
      - number of days observations were made;
      - highest six-minute average observed; and
      - dates when one or more observed six-minute averages were greater than 20 percent;
  - 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
  - a summary of any monitoring or recordkeeping required under Conditions 2 and 3 that was not done;

- 4.2. Report under Condition 57:
- 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.

*Flares (EU IDs 12 and 13)*

5. **Visible Emissions Monitoring, Recordkeeping, and Reporting.** For each of EU IDs 12 and 13, 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.

- 5.1. Monitor flare events using Method 9.
- 5.2. Record the following information for observed events:
- a. the flare(s) EU ID number;
  - b. results of the Method 9 observations;
  - c. reason(s) for flaring;
  - d. date, beginning and ending time of event; and
  - e. volume of gas flared.
- 5.3. Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available. If monitoring of a flare event is postponed for any of the reasons described in this condition, the Permittee shall include in the next operating report required by Condition 58 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 58 for the period covered by that report.
- 5.5. Report under Condition 57 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)]

**Particulate Matter Emissions Standards**

6. **Industrial Process and Fuel-Burning Equipment Particulate Matter.** The Permittee shall not cause or allow particulate matter emitted from EU IDs 1 through 6, 12 through 15, 18, and 20 listed in Table A to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

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<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.

[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 4 through 6, 18, and 20 monitor, record and report in accordance with Conditions 7 and 8.
- 6.2. For EU IDs 1 through 3, 14, and 15, burn only gas as fuel. Monitoring for these emission units shall consist of a statement in each operating report under Condition 58 whether each of these emission units fired only gas during the period covered by the report. Report under Condition 57 if any fuel other than gas is burned.
- 6.3. For each of EU IDs 12 and 13, the Permittee must annually certify compliance under Condition 59 with the particulate matter standard.

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

## **PM Monitoring, Recordkeeping and Reporting**

### *Liquid Fuel-Fired Engines (EU IDs 4 through 6, 18, and 20)*

- 7. Particulate Matter Monitoring for Diesel Engines.** The Permittee shall conduct source tests on diesel engines, EU IDs 4 through 6, 18, and 20 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.** 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)]

- 8.1. Report under Condition 57
- 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 58, 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.

**Sulfur Compound Emission Standards Requirements**

**9. 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 1 through 6, 12 through 15, 18, and 20 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)]

*For Fuel Oil<sup>2</sup> (EU IDs 4 through 6, 18, and 20)*

- 9.1. For EU IDs 4 through 6, 18, and 20, the Permittee shall comply with the fuel sulfur content limit in Condition 12.
- 9.2. The Permittee shall do one of the following for each shipment of fuel:
- a. If the fuel grade requires a sulfur content of 0.5 percent by weight or less, keep receipts that specify fuel grade or sulfur content and the amount of fuel; or

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<sup>2</sup> 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.

- b. If the fuel grade does not require a sulfur content of 0.5 percent by weight or less, keep receipts that specify the fuel grade (if available) and fuel amount and
    - (i) Test the fuel for sulfur content; or
    - (ii) Obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
- 9.3. Fuel testing under Condition 9.2 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).
- 9.4. 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 Section 12 or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).
- 9.5. The Permittee shall report as follows:
  - a. If SO<sub>2</sub> emissions calculated under Condition 9.4 exceed 500 ppm, the Permittee shall report under Condition 57. When reporting under this condition, include the calculation under Condition 9.4.
  - b. Report in accordance with Condition 57 whenever the limit in Condition 12 is exceeded.
  - c. The Permittee shall include in the operating report required by Condition 58
    - (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 0.5 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) & (c)(6)]

*For Fuel Gas (EU IDs 1 through 3 and 12 through 15)*

- 9.6. **Monitoring.** The Permittee shall monitor a representative sample of fuel gas in accordance with Condition 23.1.
- 9.7. **Recordkeeping.** The Permittee shall record the sulfur content of the fuel obtained from the sulfur content analysis required under Condition 9.6.
- 9.8. **Reporting.**
  - a. Report in accordance with Condition 57 whenever the fuel combusted causes sulfur compound emissions to exceed the standard in Condition 9.

- b. Include copies of the records required by Condition 9.7 with the operating report required by Condition 58 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)]

### **Pre-construction Permit<sup>3</sup> Requirements**

#### *Conditions to Protect Ambient Air Quality*

- 10. Annual Operational Limit.** The Permittee may operate EU ID 18 no greater than 200 hours per twelve-month rolling total.

[Condition 2, Construction Permit 066CP01, Rev 1, 12/12/2003]

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

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

- 10.1. The Permittee shall:

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

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

- a. Install and operate an hour meter that records total hours of operation of EU ID 18.
- b. Record the total hours that EU ID 18 operates each month.
- c. Report the 12-month rolling total operational hours each month in the facility operating report required in Condition 58.

[Conditions 2.1 through 2.3, Construction Permit 066CP01, Rev 1, 12/12/2003]

- d. Report in accordance with Condition 57 whenever the limit in Condition 10 is exceeded.

[40 C.F.R. 71.6(c)(6)]

#### *Prevention of Significant Deterioration (PSD) Avoidance Requirements*

- 11.** The Permittee shall limit total actual emissions, on a 12-month rolling basis, from EU IDs 1 through 6 and 12 through 15 to the levels in Table B.

[Condition 7, Permit to Operate 9523-AA007, amended 1/25/1996]

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

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

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<sup>3</sup> *Pre-construction Permit* refers to federal PSD permits, state-issued permits-to-operate issued before January 18, 1997 (these permits cover both construction and operations), construction permits issued after January 17, 1997, and minor permits issued after October 1, 2004.



**Table B – Criteria Pollutant Limits**

<b>Pollutant</b>	<b>Emission Limit (tpy)</b>
NO <sub>x</sub>	669.6
PM	53.3
CO	1,179.2
SO <sub>2</sub>	174.4
VOC	456.4

- 11.1. The Permittee shall use the emission factors in Table C, along with the amount of time or fuel used, to calculate and record the monthly emissions of each piece of equipment. When updated emission factors from testing are available, the Permittee shall use those emission factors in calculating the monthly emissions.

[Condition 5, Permit to Operate 9523-AA007, amended 1/25/1996]  
[40 C.F.R. 71.6(a)(3)(i) & (ii) & 71.6(c)(6)]

**Table C – Emission Factors**

<b>Type of Equipment</b>	<b>NO<sub>x</sub></b>	<b>PM</b>	<b>CO</b>	<b>SO<sub>2</sub></b>	<b>VOC</b>
Gas Turbine	0.32 lb/MMBtu	0.00660 lb/MMBtu	0.082 lb/MMBtu	Mass Balance	0.00210 lb/MMBtu
Natural Gas-Fired Boilers	100 lb/MMscf	7.6 lb/MMscf	84 lb/MMscf	Mass Balance	5.5 lb/MMscf
Diesel Engine < 601 hp	0.031 lb/hp-hr	0.00220 lb/hp-hr	0.00668 lb/hp-hr	Mass Balance	0.00247 lb/hp-hr
Diesel Engine > 600 hp	0.024 lb/hp-hr	0.00070 lb/hp-hr	0.00550 lb/hp-hr	Mass Balance	0.000642 lb/hp-hr
Flare	0.068 lb/MMBtu	40 µg/liter	0.37 lb/MMBtu	Mass Balance	0.063 lb/MMBtu

- 11.2. The Permittee shall report the total monthly and 12-month rolling total emissions from EU IDs 1 through 6 and 12 through 15 in the operating report required in Condition 58.

[Condition 6, Permit to Operate 9523-AA007, amended 1/25/1996]  
[40 C.F.R. 71.6(a)(3)(iii)]

- 11.3. The Permittee shall report in accordance with Condition 57 whenever a limit in Condition 11 is exceeded.

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

- 11.4. The Permittee shall verify the emission factors listed in Table C as follows:

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

- a. Within 12 months of exceeding 90 percent of the NO<sub>x</sub> limit in Condition 11, conduct NO<sub>x</sub> source tests on EU IDs 1 through 6 in accordance with Section 6.
- b. Within 12 months of exceeding 90 percent of the CO limit in Condition 11, conduct CO source tests on EU IDs 1 through 6 in accordance with Section 6.
- c. The Permittee shall begin using updated emission factors in the calculations required by Condition 11.1 on the first day of the month that the source test results are approved by the Department.

12. The Permittee shall use diesel fuel with a sulfur content no greater than 0.50 percent by weight.

[Condition 9, Permit to Operate 9523-AA007, amended 1/25/1996]  
[18 AAC 50.040(j) & 50.326(j)]  
[40 C.F.R. 71.6(a)(1)]

- 12.1. The Permittee shall monitor, record, and report in accordance with Conditions 9.2 through 9.5.

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

### Insignificant Emission Units

13. 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:

- 13.1. **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)]

- 13.2. **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)]

- 13.3. **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)]

- 13.4. General MR&R for Insignificant Emission Units

- a. The Permittee shall submit the certification of compliance of Condition 59 based on reasonable inquiry;

- b. The Permittee shall comply with the requirements of Condition 40;
- c. The Permittee shall report in the operating report required by Condition 58 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**

- 14. 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]

- 14.1. 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]

- 14.2. 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

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<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>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.

- 15. NSPS Subpart A Startup, Shutdown, & Malfunction Requirements.** The Permittee shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of EU IDs 1, 2, and 3, any malfunctions of associated air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for EU IDs 1, 2, and 3 is inoperative.

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

- 16. NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report.** 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 applicable subparts and limits are in Condition 23) and-or summary report form (see Condition 17). 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]

- 16.1. 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]

- 16.2. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of EU IDs 1, 2 and 3; 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]

- 16.3. 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]

- 16.4. 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>6</sup> The federal EEMSP report is not the same as the state excess emission report required by Condition 57.

- 17. 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 1, 2 and 3. The report shall be submitted semiannually, postmarked by the 30th day following the end of each 6-month 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]

- 17.1. If the total duration of excess emissions for the reporting period is less than one percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than five percent of the total operating time for the reporting period, submit a summary report form unless the EEMSP report described in Condition 16 is requested, or

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

- 17.2. 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 16.

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

- 18. 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]

- 18.1. 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]

- 18.2. Conduct source tests under conditions specified by EPA to be based on representative performance of EU IDs 1, 2, and 3.

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

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

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

- 18.4. 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]

- 19. NSPS Subpart A Good Air Pollution Control Practice.** At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate EU IDs 1, 2 and 3 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 1, 2 and 3.

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

- 20. 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 22 and 23, nothing in 40 C.F.R. Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU IDs 1, 2 and 3 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]

- 21. 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 22 or 23. 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**

- 22. NSPS Subpart GG NO<sub>x</sub> 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 EU ID 1 to exceed 168.1 ppmv. 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 each of EU IDs 2 and 3 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]

- 22.1. 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 Conditions 22 when being fired with an emergency fuel<sup>7</sup>.

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

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<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.

[40 C.F.R. 71.6(a)(1)]  
[40 C.F.R. 60.332(k), Subpart GG]

22.2. **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)]

- a. **Periodic Testing.** For each turbine subject to Condition 22 that operates for 400 hours or more in any 12-month period during the life of this permit, the Permittee shall comply with Conditions 22.2.a(i) and 22.2.a(ii).
- (i) For existing turbines whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the limit in Condition 22, 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, according to the criteria below:
    - (A) Within 5 years of the latest performance test, or
    - (B) Within 1 year after exceeding 400 hours of operation in a 12-month period if the last source test occurred greater than 4 years prior to the exceedance.
  - (ii) For existing turbines whose latest emissions source testing was certified as operating at greater than 90 percent of the limit in Condition 22, 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 in Condition 22.
- b. **Substituting Test Data.** The Permittee may use a Method 20, or Method 7E and either Method 3 or 3A, test under Condition 22.2.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 limit in Condition 22, and are projected under Condition 22.2.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 49
    - (A) the turbine to be tested;
    - (B) the other turbines in the group that are to be represented by the test; and
    - (C) why the turbine to be tested is representative, including that each turbine in the group



- (1) is located at a stationary source operated and maintained by the Permittee;
    - (2) 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 limit in Condition 22.
- c. **Load.** The Permittee shall comply with the following:
- (i) Conduct all tests under Condition 22.2 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 22.2 to predict the highest load at which emissions will comply with the limit in Condition 22;
    - (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 limit in Condition 22;

- (C) the Permittee shall comply with a written finding prepared by the Department that
  - (1) the information is inadequate for the Department to reasonably conclude that compliance is assured at any load greater than the test load, and that the Permittee must not exceed the test load,
  - (2) the highest load at which the information is adequate for the Department to reasonably conclude that compliance assured is less than maximum load, and the Permittee must not exceed the highest load at which compliance is predicted, or
  - (3) the Permittee must retest during a period of greater expected demand on the turbine, and
- (D) the Permittee may revise a load limit by submitting results of a more recent Method 20, or Method 7E and either Method 3 or 3A, test done at a higher load, and, if necessary, the accompanying information and demonstration described in Condition 22.2.c(iii)(A); the new limit is subject to any new Department finding under Condition 22.2.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 22.2.c(iii).
- (v) For the purposes of Conditions 22.2 through 22.4, 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.

22.3. **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 22.2.c(iii) does not show compliance with the limit in Condition 22 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 22.3.a shall be hourly or otherwise as approved by the Department.
  - (iii) Within one month after submitting a demonstration under Condition 22.2.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 22.2.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. For any turbine subject to Condition 22, that will operate less than 400 hours in any 12 consecutive months, the Permittee shall keep monthly records of the hours of operation.

**22.4. 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)]

- a. In each operating report under Condition 58 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 22.2.c(iii)
  - (i) the load limit;
  - (ii) the turbine identification; and
  - (iii) the highest load recorded under Condition 22.3.a during the period covered by the operating report.
- b. In each operating report under Condition 58 for each turbine for which Condition 22.2 has not been satisfied because the turbine normally operates less than 400 hours in any 12 consecutive months, the Permittee shall identify
  - (i) the turbine;
  - (ii) the highest number of operating hours for any 12 consecutive months ending during the period covered by the report; and
  - (iii) any turbine that operated for 400 or more hours.
- c. The Permittee shall report under Condition 57 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 22.2.a(i) or 22.2.a(ii) but not performed, or
- (iii) the turbine was operated at a load exceeding that allowed by Conditions 22.2.c(iii)(B) and 22.2.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]

- 23. NSPS Subpart GG Sulfur Standard.** For EU IDs 1, 2, and 3, the Permittee shall not burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 percent by weight (8000 ppmw).

[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]

- 23.1. Monitoring.** The Permittee shall monitor compliance with the standards listed in this condition, as follows:

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

- a. Monitor the total sulfur content of the fuel being fired in the turbine, except as provided in Condition 23.1.b. The sulfur content of the fuel must be determined using total sulfur methods described in Condition 23.2. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 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]

- 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]

- 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) *Gaseous fuel.* For owners and operators that elect not to demonstrate sulfur content using options in Condition 23.1.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]

- (ii) *Custom schedules.* Notwithstanding the requirements of Condition 23.1.d(i), 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 23. 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]

[EPA Custom Fuel Monitoring Schedule for Unocal Cook Inlet Facilities, 10/17/02]

- 23.2. **Test Methods and Procedures.** If the owner or operator is required under Condition 23.1.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]

- a. 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]

- b. 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]

- 23.3. **Recordkeeping.** The Permittee shall keep records as required by Conditions 23.1 and 23.2, and in accordance with Condition 53.

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

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

- 23.4. **Reporting.** For each affected unit that elects to periodically determine the fuel sulfur content under Condition 23.1, 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 16, 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 23.1:

[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) 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]

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

- 24. NESHAP Subpart A Requirements.** For EU IDs 4 through 6, 18, and 20, 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.

[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]

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

- 25.** For EU IDs 4 through 6, 18, and 20, 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]

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

- 25.1. For EU IDs 4 and 5, 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 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 25.5 in order to extend the specified oil change requirement in Condition 25.1.a(i).

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

25.2. For EU IDs 6, 18, and 20, 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 500 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 25.5 in order to extend the specified oil change requirement in Condition 25.2.a(i).
- d. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Condition 25.2.a, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

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

*NESHAP Subpart ZZZZ General Requirements*

25.3. For EU IDs 4 through 6, 18, and 20, 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 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*

- 25.4. For EU IDs 6, 18, and 20, the Permittee must install a non-resettable hour meter if one is not already installed.

[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(f), Subpart ZZZZ]

- 25.5. For EU IDs 4 through 6, 18, and 20, the Permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 25.1.a or 25.2.a(i). The oil analysis must be performed at the same frequency specified for changing the oil in Condition 25.1.a or 25.2.a(i). 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 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(i), Subpart ZZZZ]

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

- 25.6. For EU IDs 4 through 6, 18, and 20, 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 demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Condition 25.1 and 25.2 according to methods specified in Condition 25.6.a(i) or 25.6.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.

[40 C.F.R. 63.6625(e) & 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]

- 25.7. For EU IDs 6, 18, and 20, 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 operate the emergency stationary RICE according to the requirements in Conditions 25.7.a(i) through 25.7.a(iii). In order for the engine to be considered an emergency stationary RICE under NESHAP Subpart ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in Conditions 25.7.a(i) through (iii), is prohibited. If you do not operate the engine according to the requirements in Conditions 25.7.a(i) through (iii), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

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

- (i) There is no time limit on the use of emergency stationary RICE in emergency situations.

- (ii) You may operate your emergency stationary RICE for any combination of the purposes specified in Conditions 25.7.a(ii)(A) through 25.7.a(ii)(C) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition 25.7.a(iii) counts as part of the 100 hours per calendar year allowed by this condition.

[40 C.F.R. 63.6640(f)(1) & (2), Subpart ZZZZ]

- (A) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- (B) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies (incorporated by reference, see 40 C.F.R. 63.14), or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
- (C) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

[40 C.F.R. 63.6640(f)(2)(i) through (iii), Subpart ZZZZ]

- (iii) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition 25.7.a(ii). Except as provided in 40 C.F.R. 63.6640(f)(4)(i) and (ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

[40 C.F.R. 63.6640(f)(4), Subpart ZZZZ]

*NESHAP Subpart ZZZZ Reporting Requirements*

- 25.8. For EU IDs 4 through 6, 18, and 20, the Permittee must report all deviations as defined in NESHAP Subpart ZZZZ in the semiannual monitoring report required by Condition 58.

[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]

- 25.9. For EU IDs 6, 18, and 20, 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)(iii)]

- a. If you own or operate an emergency stationary RICE with a site rating of more than 100 brake HP that operates or is contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in Conditions 25.7.a(ii)(B) and 25.7.a(ii)(C) or that operates for the purpose specified in 40 C.F.R. 63.6640(f)(4)(ii), you must submit an annual report according to the requirements in Conditions 25.9.a(i) through 25.9.a(iii).

[40 C.F.R. 63.6650(h) & Table 7, Item 4, Subpart ZZZZ]

- (i) The report must contain the information in 40 C.F.R. 63.6650(h)(1)(i) through (ix).
- (ii) The first annual report must cover the calendar year 2015 and must be submitted no later than March 31, 2016. Subsequent annual reports for each calendar year must be submitted no later than March 31 of the following calendar year.
- (iii) The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) ([www.epa.gov/cdx](http://www.epa.gov/cdx)). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in 40 C.F.R. 63.13.

[40 C.F.R. 63.6650(h)(1) through (3), Subpart ZZZZ]

*NESHAP Subpart ZZZZ Recording Requirements*

- 25.10. For EU IDs 4 through 6, 18, and 20, 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), 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]
- 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]

25.11. For EU IDs 6, 18, and 20, the Permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in Condition 25.7.a(ii)(B) or 25.7.a(ii)(C) or 40 C.F.R. 63.6640(f)(4)(ii), the Permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[18 AAC 50.040(c)(23), (j)(4) & 50.326(j)]  
[40 C.F.R. 71.6(a)(3)(ii)]  
[40 C.F.R. 63.6655(f), Subpart ZZZZ]

## General Federal Requirements

**26. 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]

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

### Subpart F – Recycling and Emissions Reduction

27.1. **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

27.2. 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, Subpart G, §82.174(b) through (d)]

### **Subpart H – Halon Emissions Reduction**

- 27.3. 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, Subpart H, §82.270(b) through (f)]

### **NESHAPs Applicability Determinations**

28. 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).

- 28.1. 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)]  
[40 C.F.R. 63.760(e), Subpart HH]

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

- 29.1. **Reports:** Attach to the operating report required by Condition 58 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
- 29.2. **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**

- 30.** 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)]
- 31.** 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)]
- 32.** 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)]
- 33. 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]
- 34. 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
- 34.1. the stationary source's assessable potential to emit of 2,565 TPY; or
- 34.2. 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)]

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

- 35.1. 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
- 35.2. 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 34.1.

[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)]

**36. Good Air Pollution Control Practice.** The Permittee shall do the following for EU IDs 12 and 13:

- 36.1. perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
- 36.2. keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
- 36.3. 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)]

**37. 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)]

**38. 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)]

- 38.1. 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 38.1 or to address the results of Department inspections that found potential problems; and
    - (ii) to prevent future dust problems.
- 38.2. The Permittee shall report according to Condition 40.



- 39. 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)]

- 40. 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(j)(3), & 50.346(a)]

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

40.1. Monitoring, Recordkeeping, and Reporting for Condition 40:

- a. If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 57.
- b. As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 40.

40.2. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if

- a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of Condition 40; or
- b. the Department notifies the Permittee that it has found a violation of Condition 40.

40.3. The Permittee shall keep records of

- a. the date, time, and nature of all emissions complaints received;
- b. the name of the person or persons that complained, if known;
- c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 40; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

40.4. With each operating report under Condition 58, the Permittee shall include a brief summary report which must include

- a. the number of complaints received;
- b. the number of times the Permittee or the Department found corrective action necessary;

- c. the number of times action was taken on a complaint within 24 hours; and
  - d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.
- 40.5. 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.
- 41. 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 22, 23, or 27 (refrigerants), the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting under Condition 57 requires information on the steps taken to minimize emissions. Monitoring of compliance for this condition consists of the report required under Condition 57.

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

### Open Burning Requirements

- 42. Open Burning.** The Permittee shall not conduct open burning at the facility.

[18 AAC 50.065, 50.040(j), & 50.326(j)]  
[40 C.F.R. 71.6(a)(3)]  
[Condition 29, Operating Permit 066TVP01, 9/18/2002]

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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***

- 43. 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)]

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

[18 AAC 50.220(b)]

- 44.1. at a point or points that characterize the actual discharge into the ambient air; and
- 44.2. 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.

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

- 45.1. 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]

- 45.2. 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]

- 45.3. 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]

- 45.4. 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)]

- 45.5. 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]
- 45.6. 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]
- 45.7. 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]
- 46. 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)]
- 47. Test Exemption.** The Permittee is not required to comply with Conditions 49, 50 and 51 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)]
- 48. 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)]
- 49. Test Plans.** Except as provided in Condition 47, 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 43 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)]

- 50. Test Notification.** Except as provided in Condition 47, 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)]

- 51. Test Reports.** Except as provided in Condition 47, 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 54. 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)]

- 52. Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in Conditions 6 and 13.2, 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**

- 53. 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)]

- 53.1. Copies of all reports and certifications submitted pursuant to this section of the permit; and
- 53.2. 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**

- 54. 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.

- 54.1. 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 54.1.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)]

- 55. 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 cover letter certified in accordance with Condition 54.

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

- 56. 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)]

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

- 57.1. Except as provided in Condition 40, 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 57.1.c(ii) and 57.1.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 57.1.c(i); and
  - (iii) for failure to monitor, as required in other applicable conditions of this permit.

57.2. When reporting excess emissions or permit deviations, the Permittee shall report using either the Department's on-line form, which can be found at <http://www.dec.state.ak.us/air/ap/site.htm>, or if the Permittee prefers, the form contained in Section 13 of this permit. The Permittee must provide all information called for by the form that is used.

57.3. 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)]

**58. 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.

58.1. The operating report must include all information required to be in operating reports by other conditions of this permit.

58.2. If excess emissions or permit deviations that occurred during the reporting period are not reported under Condition 58.1,

a. The Permittee shall identify

(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 57 the Permittee shall cite the date or dates of those reports.

58.3. 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.

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<sup>9</sup> *Life of this permit* is defined as the permit effective dates, including any periods of reporting obligations that extend beyond the permit effective dates. For example if a permit expires prior to the end of a calendar year, there is still a reporting obligation to provide operating reports for the periods when the permit was in effect.



- 58.4. **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)]

**59. 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>.

- 59.1. 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;

- 59.2. **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.

- 59.3. 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)]

**60. 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:

- 60.1. Each year by March 31, if the stationary source's potential to emit emissions for the previous calendar year:
- a. equals or exceeds 250 tons per year (TPY) of NH<sub>3</sub>, PM<sub>10</sub>, PM<sub>2.5</sub> or VOCs; or
  - b. equals or exceeds 2500 TPY of CO, NO<sub>x</sub> or SO<sub>2</sub>.
- 60.2. 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

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<sup>10</sup> See Condition 59.2 for clarification on the number of reports required.

- 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.
- 60.3. For Condition 60.2, the Permittee shall commence reporting in 2015 for the calendar year of 2014, 2018 for calendar year 2017, etc.
- 60.4. 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]

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

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

- 61.1. 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>;
- 61.2. The information shall be submitted to the same address as in Condition 59.3.
- 61.3. 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
- 61.4. 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)]

**62. 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)]

**63. 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:

- 63.1. Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition;
- 63.2. 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;
- 63.3. The change shall not qualify for the shield under 40 C.F.R. 71.6(f);

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<sup>11</sup> The documents required in Condition 61.1 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.

- 63.4. 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)]

- 64. 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):

- 64.1. The Permittee shall provide EPA and the Department with a notification no less than 7 days in advance of the proposed change.
- 64.2. 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.
- 64.3. The permit shield described in 40 C.F.R. 71.6(f) shall not apply to any change made pursuant to Condition 64.

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

- 65. 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>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**

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

66.1. included and specifically identified in the permit; or

66.2. determined in writing in the permit to be inapplicable.

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

**67.** The Permittee must comply with each permit term and condition.

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

67.2. 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)]

**68.** 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)]

**69.** 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

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

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

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

69.4. 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)]

- 70.** 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.

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

- 71.1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; or
- 71.2. 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)]

**72.** Table D 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 D 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 D - 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.
14, 15	40 C.F.R. Part 60 Subpart Dc	This boiler is not affected source because its maximum design capacity is less than 10 MMBtu/hr.
1, 2, 3	40 C.F.R. 60.334(a) and (b)	These requirements apply only to turbines using water injection for NOx control. This turbine does not use water injection for NOx control.
1, 2, 3	40 C.F.R. 60.334(c) - (g)	These requirements specify optional monitoring methods that Hilcorp chooses not to conduct.
1, 2, 3	40 C.F.R. 60.334(h)(2)	This requirement is applicable to sources who claim an allowance for fuel bound nitrogen to monitor the nitrogen content of the fuel combusted in the turbine. Hilcorp chooses not to claim an allowance for fuel bound nitrogen.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
1, 2, 3	40 C.F.R. 60 Subpart KKKK	Construction, modification, or reconstruction of the stationary combustion turbine commenced prior to the applicability date of February 18, 2005. A permit shield from NSPS Subpart KKKK only applies to currently installed units until modified, reconstructed or replaced.
4, 5, 6, 18, 20	40 C.F.R. 60 Subpart IIII	This regulation is for diesel-fired engines constructed after July 11, 2005. These units were constructed before July 11, 2005 and therefore are not affected sources.
4, 5, 6, 18, 20	40 C.F.R. 60 Subpart JJJJ	This regulation is for spark ignition engines constructed after June 12, 2006. This diesel-fired engine was constructed before June 12, 2006 and therefore is not an affected source.
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, 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, HHH, 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, BBBB, CCCC, DDDD, EEEEE, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK, LLLL, MMMM, NNNN, OOOO, PPPP, QQQQ, RRRR, SSSS, TTTT, UUUU, VVVV, WWWW, XXXX, YYYY, ZZZZ, BBBB, CCCC, DDDD, EEEE, FFFF, GGGG, HHHH, LLLL, MMMM, NNNN, OOOO, PPPP, QQQQ, RRRR, SSSS, TTTT, VVVV, WWWW, XXXX, YYYY, and ZZZZ	No existing emission unit is an “affected facility” at the issue date of this permit. This source is not a major source of HAPs, as defined in 40 C.F.R. 63.2.
All existing emission units	40 C.F.R. 63, Subparts AAAAAA, BBBB, CCCCC, DDDDD, EEEEE, and HHHHHH	No existing emission unit is an “affected facility” at the issue date of this permit. This source is not a major source of HAPs, as defined in 40 C.F.R. 63.2.
1, 2, 3	40 C.F.R. 63 Subpart YYYY	This facility is not a major source of HAP emissions. Subpart YYYY applies to major sources of HAP emissions. A permit shield from Subpart YYYY only applies to the currently installed units until the source becomes a major source of HAP emissions.



EU ID	Non-Applicable Requirements	Reason for Non-Applicability
4, 5, 6, 18, 20	40 C.F.R. 63 Subpart ZZZZ §§63.6600, 63.6601, 63.6602, 63.6610, 63.6611	Granite Point Platform is an area source of HAP emissions.
4, 5, 6, 18, 20	40 C.F.R. 63 Subpart ZZZZ Operating limitations under Table 2b	Under 63.6603(b)(1), non-emergency CI RICE located as area sources not accessible by the FAHS are not subject to the numerical CO emissions limitations or the operating limitations related to oxidation catalysts in Table 2b. Such engines are only subject to the management practice requirements under Table 2d.
4, 5, 6, 18, 20	40 C.F.R. 63 Subpart ZZZZ 63.6604, 63.6625(g)	Granite Point Platform is not accessible by the FAHS.
4, 5, 6, 18, 20	40 C.F.R. 63 Subpart ZZZZ 63.6612, 63.6615, and 63.6620	The performance test requirements do not apply because the CI RICE on the Granite Point Platform are not subject to numerical CO emission standards. Therefore, no initial performance test is required.
4, 5, 6, 18, 20	40 C.F.R. 63 Subpart ZZZZ 63.6625(a)-(d)	Requirements apply to RICE using CEMS, CPMS to demonstrate compliance, to RICE burning landfill or digester gas, or to emergency RICE located at a major source of HAP emissions.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6630	Does not apply because the CI RICE on the Granite Point Platform are not subject to numerical CO emission standards.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6640(b), 63.6640(d)	Reporting requirements apply to RICE subject to an emission limitation or operating limitation. The CI RICE on the Granite Point Platform are subject only to the Subpart ZZZZ management practices applicable to emergency CI RICE, and to non-emergency CI RICE located at area sources not accessible by the FAHS.
4, 5	40 C.F.R. Part 63 Subpart ZZZZ 63.6625(f), 63.6640(f), 63.6655(f)	Applies only to emergency RICE. Hilcorp has not designated this CI RICE as emergency RICE for purposes of Subpart ZZZZ.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6645(a)	Per 63.6645(a)(5), notification requirements do not apply to existing RICE not subject to a numerical emission standard.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6645(b)-(h)	Notification requirements apply to RICE located at HAP major sources, or to RICE required to conduct a performance test or other initial compliance demonstration.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6655(a), 63.6655(b)	These recordkeeping requirements only apply to RICE subject to an emission or operating limitation.
4, 5, 6, 18, 20	40 C.F.R. Part 63 Subpart ZZZZ 63.6655(c)	These recordkeeping requirements only apply to RICE burning landfill or digester gas.
14, 15	40 C.F.R. 63 Subpart JJJJJ	These boilers are gas-fired boilers and 63.11195(e) exempts gas-fired boilers from this subpart.
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.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
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
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.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
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.
Mobile Engines	18 AAC 50.055(a)(1) – Fuel-Burning Equipment Emission Standards; Visible Emissions	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), Fuel-burning equipment standards, opacity emission limit of 20 percent, 6-minute average	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.055(a)(6) and (7), Fuel-burning equipment standards, opacity emission limit of 10 percent, 6-minute average	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.055(a)(9), Fuel-burning equipment standards, opacity emission limit of 20 percent, 3-minute average	No affected emission units within the permitted stationary source.
Mobile Engines	18 AAC 50.055(b)(1) – Fuel-Burning Equipment Emissions Standards: Particulate Matter	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(b)(2) and (3), Fuel-burning equipment standards, PM emission limit of 0.1 grains	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.055(b)(4), Fuel-burning equipment standards, PM emission limit of 0.15 grains	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.055(b)(5) and (6), Fuel-burning equipment standards, PM emission limit of 0.04 grains	No affected emission units within the permitted stationary source.
Mobile Engines	18 AAC 50.055(c) - Fuel-Burning Equipment Emissions Standards: Sulfur Compound Emissions	Mobile internal combustion engines are not included in the definition of fuel-burning equipment (18 AAC 50.990).
All existing emission units	18 AAC 50.060, Pulp Mills	No affected emission units within the permitted stationary source.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
All existing emission units	18 AAC 50.070, Marine Vessels, visible emission standards	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.075, Wood fired heating device emission standards	No affected emission units within the permitted stationary source.
All existing emission units	18 AAC 50.085, Volatile liquid storage tank emission standards	Regulations only apply to tanks within the Port of Anchorage.
All existing emission units	18 AAC 50.090, Volatile liquid loading racks and delivery emission standards	Regulations only apply to facilities within the Port of Anchorage.

## Section 11. Visible Emissions Forms

### VISIBLE EMISSION OBSERVATION FORM

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

- 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.
  - 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.

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR PERMITS PROGRAM - VISIBLE EMISSIONS OBSERVATION FORM									
Page No. _____									
Stationary Source Name		Type of Emission Unit		Observation Date		Start Time		End Time	
Emission Unit Location				Sec		0	15	30	45
				Min					Comments
City		State		Zip					
Phone # (Key Contact)		Stationary Source ID Number		2					
Process Equipment		Operating Mode		3					
Control Equipment		Operating Mode		4					
Describe Emission Point/Location				5					
Height above ground level		Height relative to observer		6					
		Clinometer Reading		7					
Distance From Observer		Direction From Observer		8					
Start		End		Start		End			
Describe Emissions & Color				9					
Start		End		10					
Visible Water Vapor Present? If yes, determine approximate distance from the stack exit to where the plume was read				11					
No		Yes		12					
Point in Plume at Which Opacity Was Determined				13					
Describe Plume Background		Background Color		14					
Start		Start		15					
End		End		16					
Sky Conditions:				17					
Start		End		18					
Wind Speed		Wind Direction From		19					
Start		End		Start		End			
Ambient Temperature		Wet Bulb Temp		RH percent		16			
SOURCE LAYOUT SKETCH: 1 Stack or Point Being Read 2 Wind Direction From				17					
3 Observer Location 4 Sun Location 5 North Arrow 6 Other Stacks				18					
				19					
				20					
				21					
				22					
				23					
				24					
				25					
				26					
				27					
				28					
				29					
				30					
Range of Opacity									
Minimum		Maximum							
I have received a copy of these opacity observations				Print Observer's Name					
Print Name:				Observer's Signature				Date	
Signature:				Certifying Organization				Observer's Affiliation:	
Title		Date		Certified By:				Date	
<b>Data Reduction:</b>									
Duration of Observation Period (minutes):				Duration Required by Permit (minutes):					
Number of Observations:				Highest Six-Minute Average Opacity (%):					
Number of Observations exceeding 20%:				Highest 18-Consecutive -Minute Average Opacity (%) (engines and turbines only)					
In compliance with six-minute opacity limit? (Yes or No)									
<b>Average Opacity Summary:</b>									
Set Number	Time			Opacity		Sum	Average	Comments	
	Start	End							

## Section 12. Material Balance Calculation

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

$$\begin{aligned}
 \text{A. } &= 31,200 \times [\text{wt}\% \text{S}_{\text{fuel}}] = 31,200 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{B. } &= 0.148 \times [\text{wt}\% \text{S}_{\text{fuel}}] = 0.148 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{C. } &= 0.396 \times [\text{wt}\% \text{C}_{\text{fuel}}] = 0.396 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{D. } &= 0.933 \times [\text{wt}\% \text{H}_{\text{fuel}}] = 0.933 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{E. } &= \text{B} + \text{C} + \text{D} = \underline{\hspace{2cm}} + \underline{\hspace{2cm}} + \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{F. } &= 21 - [\text{vol}\%_{\text{dry}} \text{O}_2, \text{ exhaust}] = 21 - \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{G. } &= [\text{vol}\%_{\text{dry}} \text{O}_2, \text{ exhaust}] \div \text{F} = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{H. } &= 1 + \text{G} = 1 + \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{I. } &= \text{E} \times \text{H} = \underline{\hspace{2cm}} \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \\
 \text{SO}_2 \text{ concentration} &= \text{A} \div \text{I} = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \text{ ppm}
 \end{aligned}$$

The wt% S<sub>fuel</sub>, wt% C<sub>fuel</sub>, and wt% H<sub>fuel</sub> are equal to the weight 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 9.2. 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<sub>fuel</sub> = 1.0%, then enter 1.0 into the equations not 0.01 and if vol%<sub>dry</sub> O<sub>2</sub>, exhaust = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.346(c)]

### Section 13. ADEC Notification Form<sup>13</sup>

Granite Point Platform

AQ0066TVP03

Stationary Source Name

Air Quality Permit No.

Hilcorp Alaska, LLC

Company Name

Date

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

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

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

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

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

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

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

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

**What was the duration of the event/deviation?** \_\_\_\_ : \_\_\_\_ (hrs:min) or \_\_\_\_ days  
(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

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

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

#### Section 1. Excess Emissions

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

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

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

(c) Description

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

(d) Emissions Units Involved:

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

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

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



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

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

(f) Unavoidable Emissions:

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

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

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

## Section 2. Permit Deviations

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

- ☐ Emission Unit-Specific      ☐ Generally Applicable Requirements  
☐ Failure to Monitor/Report      ☐ Reporting/Monitoring for Diesel Engines  
☐ General Source Test/Monitoring Requirements      ☐ Recordkeeping Failure  
☐ 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 as in the permit. List the corresponding permit conditions and the deviation.

EU ID	EU Name	Permit Condition/ Potential Deviation

(c) Description of Potential Deviation:

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

(d) Corrective Actions:

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

**Certification:**

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

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

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

**To Submit this Report:**

Fax to: 907-451-2187

Or

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

*If faxed or emailed, the report must be certified within the Operating Report required for the same reporting period per Condition 58.*

Or

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

Or

Phone Notification: 907-451-5173

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

Or

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

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

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

[18 AAC 50.346(b)(3)]

## Section 14. Emission Inventory Form

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

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

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

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

	<b>Hours/Day of Operation:</b>
	<b>Hours/Year of Operation:</b>

<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					

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

	<b>Datum:</b>
--	---------------

**Certification:**

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

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

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

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

**To Submit this report:**

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

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)]