



Hilcorp Alaska, LLC

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Date: October 26, 2018

To: Alaska Department of Environmental Conservation
Air Permits Program
ATTN: Application Intake
555 Cordova Street
Anchorage, AK 99501



Subject: Beluga River Unit Air Quality Operating Permit No. AQ0942TVP01, Rev. 2 –
Application for Renewal Amendment

Dear Application Intake,

Hilcorp Alaska, LLC (Hilcorp) seeks an amendment to the Title V Operating Permit Renewal Application for Beluga River Unit (Beluga) submitted on July 6, 2018. As discussed below, the requested amendments revise the Emission Unit Inventory in Form B, D Forms and Form E3.

Hilcorp requests to update the ratings of the dehydrators to the throughput values for each dehydrator and addition of the reboilers as separate insignificant units for the purpose of clarity.

Please contact Drew Anderson at (907) 777-8488 regarding any questions or concerns associated with the attached documents.

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.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Wilkins', written over a horizontal line.

David S. Wilkins
Senior Vice President
Hilcorp Alaska, LLC

cc: USEPA Region 10

FORM B
Emission Unit Listing For This Application

Permit Number: AQ0942TVP01, Rev. 2

| EMISSION UNIT LISTING: New, Modified, Previously Unpermitted, Replaced, Deleted | | | | | |
|--|------------------------|---------------------------------|---|--------------------|--|
| Emission Unit ID Number | Emission Unit Name | Brief Emission Unit Description | Rating/Size | Construction Date | Notes |
| Emission Units To Be ADDED By This Application (New, Previously Unpermitted, or Replacement) | | | | | |
| 43 | B Pad Compressor Drive | Caterpillar 3306TA Engine | 220 hp | 2015 | Model Year 2010 Engine |
| 44 | GDF | Gasoline Dispensing Facility | Less than 10,000 gallons per month throughput | Prior to 11/9/2006 | Existing GDF |
| N/A | GDU | Pad H GDU Reboiler #1 | 0.25 MMBtu/hr | Pre-1990 | Insignificant units based on 18 AAC 50.326(g)(5) |
| N/A | GDU | Pad H GDU Reboiler #2 | 0.25 MMBtu/hr | Pre-1990 | |
| N/A | GDU | Pad H GDU Reboiler #3 | 0.18 MMBtu/hr | Pre-1990 | |
| N/A | GDU | Pad A GDU Reboiler | 0.075 MMBtu/hr | 1973 | |
| N/A | GDU | Pad B GDU Reboiler | 0.25 MMBtu/hr | 1968 | |
| N/A | GDU | Pad C GDU Reboiler #1 | 0.25 MMBtu/hr | 1987 | |
| N/A | GDU | Pad C GDU Reboiler #2 | 0.25 MMBtu/hr | 1987 | |
| N/A | GDU | Pad D GDU Reboiler | 0.25 MMBtu/hr | 1968 | |
| N/A | GDU | Pad E GDU Reboiler #1 | 0.25 MMBtu/hr | 1968 | |
| N/A | GDU | Pad E GDU Reboiler #2 | 0.125 MMBtu/hr | 1968 | |
| N/A | GDU | Pad F GDU Reboiler | 0.25 MMBtu/hr | 1968 | |
| N/A | GDU | Pad G GDU Reboiler | 0.50 MMBtu/hr | 1968 | |
| N/A | GDU | Pad I GDU Reboiler | 0.25 MMBtu/hr | 1968 | |
| N/A | GDU | Pad J GDU Reboiler #1 | 0.25 MMBtu/hr | 1985 | |
| N/A | GDU | Pad J GDU Reboiler #2 | 0.175 MMBtu/hr | 1985 | |
| N/A | GDU | Pad J GDU Reboiler #3 | 0.125 MMBtu/hr | 1985 | |
| N/A | GDU | Pad K GDU Reboiler | 0.25 MMBtu/hr | 1985 | |

FORM B
Emission Unit Listing For This Application

| Emission Units To Be MODIFIED By This Application | | | | | |
|---|-----|----------------------------------|-------------|----------|--|
| 4 | GDU | Pad H Glycol Dehydration Vent #1 | 5.53 MMscfd | Pre-1990 | Update ratings to the values for the dehydrator vents. Reboilers will be added as insignificant units. |
| 5 | GDU | Pad H Glycol Dehydration Vent #2 | 55 MMscfd | Pre-1990 | |
| 6 | GDU | Pad H Glycol Dehydration Vent #3 | 55 MMscfd | Pre-1990 | |
| 7 | GDU | Pad A Glycol Dehydration Vent | 0.45 MMscfd | 1973 | |
| 8 | GDU | Pad B Glycol Dehydration Vent | 0.27 MMscfd | 1968 | |
| 9 | GDU | Pad C Glycol Dehydration Vent #1 | 5.14 MMscfd | 1987 | |
| 10 | GDU | Pad C Glycol Dehydration Vent #2 | 5.14 MMscfd | 1987 | |
| 13 | GDU | Pad D Glycol Dehydration Vent | 3.92 MMscfd | 1968 | |
| 14 | GDU | Pad E Glycol Dehydration Vent #1 | 1.99 MMscfd | 1968 | |
| 15 | GDU | Pad E Glycol Dehydration Vent #2 | 3.87 MMscfd | 1968 | |
| 16 | GDU | Pad F Glycol Dehydration Vent | 6.71 MMscfd | 1968 | |
| 17 | GDU | Pad G Glycol Dehydration Vent | 2.10 MMscfd | 1968 | |
| 18 | GDU | Pad I Glycol Dehydration Vent | 3.05 MMscfd | 1968 | |
| 21 | GDU | Pad J Glycol Dehydration Vent #1 | 2.37 MMscfd | 1985 | |
| 22 | GDU | Pad J Glycol Dehydration Vent #2 | 2.37 MMscfd | 1985 | |
| 23 | GDU | Pad J Glycol Dehydration Vent #3 | 2.37 MMscfd | 1985 | |
| 24 | GDU | Pad K Glycol Dehydration Vent | 3.53 MMscfd | 1985 | |

FORM B
Emission Unit Listing For This Application

| Emission Units To Be DELETED By This Application | | | | | |
|---|----------------------|--|--|-------------------|--|
| N/A | GDU | Enstar II Pad H Glycol Dehydration Unit | 0.25 MMBtu/hr | Pre-1990 | This was a mistaken duplication of EU ID 5 and can be removed from the insignificant emission unit list. |
| N/A | GDU | Enstar III Pad H Glycol Dehydration Unit | 0.25 MMBtu/hr | Pre-1990 | This was a mistaken duplication of EU ID 6 and can be removed from the insignificant emission unit list. |
| SIGNIFICANT EMISSION UNIT LISTING: Title V permitted emission units that have not been modified | | | | | |
| Emission Unit ID Number | Emission Unit Name | Brief Emission Unit Description | Rating/Size | Construction Date | |
| 1 | Turbine Compressor | Solar Taurus 60 Compressor Drive | 7,700 hp | 2006 | |
| 2 | Emergency Compressor | Waukesha H24GLD MOC Compressor Drive | 530 hp | 2005 | |
| 3 | Emergency Generator | John Deere Engine | 420 kW | 2008 | |
| 12 | Emergency Generator | Cummins Engine | 350 kW | Pre-1990 | |
| 19 | Emergency Generator | Duetz Engine | 50 kW | Pre-1990 | |
| 26 | Incinerator | Thermal Engine Corp Incinerator | 150 lb/hr | Pre-1990 | |
| 37 | Compressors | Wellsite Compressor Engines | 7,500 hp (cumulative maximum allowable total) | 2011 | |
| 42 | Emergency Generator | Caterpillar Engine | 230 kW | 2012 | |

FORM B
Emission Unit Listing For This Application

| INSIGNIFICANT EMISSION UNIT LISTING: Insignificant Title V permitted emission units that have not been modified | | | | |
|--|--|---------------|-------------------|--------------------------------|
| Emission Unit Name | Brief Emission Unit Description | Rating/Size | Construction Date | Basis for Insignificant Status |
| Process Heater | Pad 211-3/224-34 Process Heater | 1.00 MMBtu/hr | 1987 | 18 AAC 50.326(g)(5) |
| Process Heater | Pad 224-23/232-26/211-26 Process Heater | 1.00 MMBtu/hr | 1985 | 18 AAC 50.326(g)(5) |
| Process Heater | Pad 224-23/232-26/211-26 Process Heater | 1.00 MMBtu/hr | 1985 | 18 AAC 50.326(g)(5) |
| Office Heater | Office Coleman Heater | 0.06 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Shop Heater | Shop Perfection Schwank Heater | 0.02 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Heater | Electrical Shop Modine Heater | 0.03 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Heater | Mechanics Shop Modine Heater | 0.11 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Heater | Mechanics Shop Modine Heater | 0.30 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Heater | BRWD Heater | 0.50 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(5) |
| Heater | Mechanics Shop Used Oil Heater | 0.5 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(7) |
| Portable Frost Fighter | Portable Frost Fighter | 0.4 MMBtu/hr | Pre-1990 | 18 AAC 50.326(g)(7) |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

**Table D-1a. Assessable Potential Emissions - Potential Annual Emissions (after controls/limitations)
Hilcorp Alaska, LLC - Beluga River Unit**

| | | Emissions (tons/year) | | | | | | |
|--|------------------------------------|-----------------------|--------------|------------------|-------------|-----------------|------------------|-----------------|
| EU ID | Emission Unit Name | NO _x | CO | PM ₁₀ | VOC | SO ₂ | CO _{2e} | HAP |
| Significant Units | | | | | | | | |
| <i>Turbines and Engines</i> | | | | | | | | |
| 1 | Turbine Compressor- Out of Solonox | 2.5 | 39.4 | 1.8 | 0.6 | 1.1 | 31,594 | 0.00 |
| 1 | Turbine Compressor- In Solonox | 7.7 | 5.6 | | | | | |
| 2 | Compressor | 0.1 | 2.45E-02 | 1.63E-05 | 2.50E-02 | 8.93E-04 | 25 | 0.00 |
| 3 | Generator | 0.3 | 0.2 | 0.2 | 0.2 | 3.02E-02 | 26 | 0.00 |
| 12 | Generator | 0.7 | 0.2 | 0.1 | 0.1 | 2.52E-02 | 27 | 0.00 |
| 19 | Generator | 0.1 | 2.24E-02 | 7.38E-03 | 8.28E-03 | 3.60E-03 | 4 | 0.00 |
| 37-1 | Wellsite Compressor | 0.4 | 2.8 | 0.3 | 0.1 | 1.24E-01 | 3,447 | 0.00 |
| 37-2 | Wellsite Compressor | 0.4 | 4.9 | 0.2 | 0.1 | 1.09E-01 | 3,036 | 0.00 |
| 37-3 | Wellsite Compressor | 1.3 | 0.5 | 0.1 | 2.70E-02 | 5.90E-02 | 1,641 | 0.00 |
| 37-4 | Wellsite Compressor | 3.8 | 6.2 | 0.3 | 0.2 | 1.24E-01 | 3,447 | 0.00 |
| 37-6 | Wellsite Compressor | 1.0 | 1.4 | 0.1 | 0 | 5.90E-02 | 1,641 | 0.00 |
| 37-7 | Wellsite Compressor | 4.0 | 7.9 | 0.3 | 0.2 | 1.24E-01 | 3,447 | 0.00 |
| 37-8 | Wellsite Compressor | 4.2 | 6.6 | 0.2 | 0.1 | 1.09E-01 | 3,036 | 0.00 |
| 37-9 | Wellsite Compressor | 3.3 | 6.9 | 0.2 | 0.1 | 1.09E-01 | 3,036 | 0.00 |
| 37-10 | Wellsite Compressor | 5.4 | 13.0 | 0.3 | 0.2 | 1.24E-01 | 3,447 | 0.00 |
| 42 | Generator | 0.1 | 2.35E-02 | 4.50E-03 | 6.50E-03 | 1.66E-02 | 14 | 0.00 |
| 43 | Wellsite Compressor | 1.4 | 1.6 | 0.1 | 0.1 | 3.25E-02 | 903 | 0.00 |
| <i>Incinerator</i> | | | | | | | | |
| 26 | Incinerator | 1.0 | 3.3 | 2.3 | 1.0 | 0.8 | 668 | 8.24E-02 |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | |
| 44 | GDF | 0 | 0 | 0 | 1.5 | 0 | 0 | 0.00 |
| Significant Unit Total | | 37.7 | 100.3 | 6.5 | 4.4 | 3.0 | 59,439 | 8.24E-02 |
| Insignificant Units | | | | | | | | |
| <i>Glycol Reboilers</i> | | | | | | | | |
| N/A | Pad H Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | 5.74E-05 |
| N/A | Pad H Glycol Reboiler #2 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad H Glycol Reboiler #3 | 0.08 | 0.06 | 5.83E-03 | 3.08E-05 | 1.37E-01 | 90 | |
| N/A | Pad A Glycol Reboiler | 0.03 | 0.03 | 2.50E-03 | 1.32E-05 | 5.87E-02 | 38 | |
| N/A | Pad B Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad C Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad C Glycol Reboiler #2 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad D Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad E Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad E Glycol Reboiler #2 | 0.05 | 0.05 | 4.16E-03 | 2.20E-05 | 9.79E-02 | 64 | |
| N/A | Pad F Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad G Glycol Reboiler | 0.22 | 0.18 | 1.66E-02 | 8.79E-05 | 3.92E-01 | 256 | |
| N/A | Pad I Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad J Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad J Glycol Reboiler #2 | 0.08 | 0.06 | 5.83E-03 | 3.08E-05 | 1.37E-01 | 90 | |
| N/A | Pad J Glycol Reboiler #3 | 0.05 | 0.05 | 4.16E-03 | 2.20E-05 | 9.79E-02 | 64 | |
| N/A | Pad K Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| <i>Glycol Dehydration Vents</i> | | | | | | | | |
| 4 | Pad H Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 2.33E-01 | 0.00 | 0.7 | 0.00 |
| 5 | Pad H Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 0.00E+00 | 0.00 | 1.8 | 0.00 |
| 6 | Pad H Glycol Dehydration Vent #3 | 0.00 | 0.00 | 0.00 | 1.08E-02 | 0.00 | 0.9 | 0.00 |
| 7 | Pad A Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 1.70E-01 | 0.00 | 0.7 | 0.00 |
| 8 | Pad B Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 8.00E-04 | 0.00 | 0.3 | 0.00 |
| 9 | Pad C Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 1.31E-01 | 0.00 | 0.4 | 0.00 |
| 10 | Pad C Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 0.00E+00 | 0.00 | 0.2 | 0.00 |
| 13 | Pad D Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 2.60E-03 | 0.00 | 0.4 | 0.00 |
| 14 | Pad E Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 1.50E-01 | 0.00 | 0.3 | 0.00 |
| 15 | Pad E Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 7.23E-02 | 0.00 | 0.1 | 0.00 |
| 16 | Pad F Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 8.00E-04 | 0.00 | 0.9 | 0.00 |
| 17 | Pad G Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 3.87E-01 | 0.00 | 0.3 | 0.00 |
| 18 | Pad I Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 2.76E-01 | 0.00 | 0.2 | 0.00 |
| 21 | Pad J Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 2.36E-01 | 0.00 | 1.2 | 0.00 |
| 22 | Pad J Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 2.35E-01 | 0.00 | 1.2 | 0.00 |
| 23 | Pad J Glycol Dehydration Vent #3 | 0.00 | 0.00 | 0.00 | 2.70E-03 | 0.00 | 1.4 | 0.00 |
| 24 | Pad K Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 1.96E-01 | 0.00 | 0.2 | 0.00 |
| <i>Insignificant Heaters</i> | | | | | | | | |
| 11 | Process Heater | 0.4 | 0.4 | 0.03 | 2.41E-02 | 0.78 | 512.9 | 1.46E-05 |
| 20 | Process Heater | 0.4 | 0.4 | 0.03 | 2.41E-02 | 0.78 | 512.9 | 2.78E-05 |
| 25 | Process Heater | 0.1 | 4.60E-02 | 4.16E-03 | 3.01E-03 | 0.10 | 64.1 | 1.83E-06 |
| 29 | Office Coleman Heater | 2.63E-02 | 2.21E-02 | 2.00E-03 | 1.45E-03 | 0.05 | 30.8 | 8.78E-07 |
| 30 | Shop Perfection Schwank Heater | 8.76E-03 | 7.36E-03 | 6.66E-04 | 4.82E-04 | 0.02 | 10.3 | 2.93E-07 |
| 31 | Electrical Shop Modine Heater | 1.31E-02 | 1.10E-02 | 9.99E-04 | 7.23E-04 | 0.02 | 15.4 | 4.39E-07 |
| 32 | Mechanics Shop Modine Heater | 4.82E-02 | 4.05E-02 | 3.66E-03 | 2.65E-03 | 0.09 | 56.4 | 1.61E-06 |
| 33 | Mechanics Shop Modine Heater | 0.1 | 0.1 | 0.01 | 7.23E-03 | 0.23 | 153.9 | 4.39E-06 |
| 34 | BRWD Heater | 0.2 | 0.2 | 0.02 | 1.20E-02 | 0.39 | 256.4 | 7.31E-06 |
| 35 | Mechanics Shop Used Oil Heater | 0.2 | 2.72E-02 | 0.22 | 1.60E-02 | 3.15E-03 | 358.3 | 4.01E-03 |
| 36 | Portable Frost Fighter | 0.3 | 0.1 | 0.04 | 8.95E-03 | 2.52E-03 | 286.6 | 0.00E+00 |
| Insignificant Unit Total | | 1.81 | 1.25 | 0.37 | 0.10 | 2.47 | 2,257.98 | 4.06E-03 |
| Total (Significant and Insignificant) | | 39.5 | 101.6 | 6.9 | 4.5 | 5.5 | 61,697 | 0.1 |
| Major/Minor | | Minor | Major | Minor | Minor | NA | NA | NA |
| Total Assessable Emissions | | 148 | | | | | | |

**Table D-1b. Unlimited Potential Emissions - Potential Annual Emissions (before controls/limitations)
Hilcorp Alaska, LLC - Beluga River Unit**

| EU ID | Emission Unit Name | Emissions (tons/year) | | | | | | |
|--|------------------------------------|-----------------------|--------------|------------------|-------------|-----------------|-------------------|------------|
| | | NO _x | CO | PM ₁₀ | VOC | SO ₂ | CO ₂ e | HAP |
| Significant Units | | | | | | | | |
| <i>Turbines and Engines</i> | | | | | | | | |
| 1 | Turbine Compressor- Out of Solonox | 54.0 | 863.4 | 1.8 | 12.4 | 1.1 | 31,594 | 0.00 |
| 1 | Turbine Compressor- In Solonox | 0 | 0 | | | | | |
| 2 | Compressor | 0.6 | 0.1 | 8.16E-05 | 0.1 | 8.93E-04 | 124 | 0.00 |
| 3 | Generator | 1.5 | 0.8 | 0.8 | 14.2 | 2.6 | 132 | 0.00 |
| 12 | Generator | 3.6 | 0.8 | 0.3 | 5.1 | 2.2 | 134 | 0.00 |
| 19 | Generator | 0.5 | 0.1 | 3.69E-02 | 0.7 | 0.3 | 19 | 0.00 |
| 37-1 | Wellsite Compressor | 0.4 | 2.8 | 0.3 | 0.1 | 0.1 | 3,447 | 0.00 |
| 37-2 | Wellsite Compressor | 0.4 | 4.9 | 0.2 | 0.1 | 0.1 | 3,036 | 0.00 |
| 37-3 | Wellsite Compressor | 1.3 | 0.5 | 0.1 | 2.70E-02 | 0.1 | 1,641 | 0.00 |
| 37-4 | Wellsite Compressor | 3.8 | 6.2 | 0.3 | 0.2 | 0.1 | 3,447 | 0.00 |
| 37-6 | Wellsite Compressor | 1.0 | 1.4 | 0.1 | 0 | 0.1 | 1,641 | 0.00 |
| 37-7 | Wellsite Compressor | 4.0 | 7.9 | 0.3 | 0.2 | 0.1 | 3,447 | 0.00 |
| 37-8 | Wellsite Compressor | 4.2 | 6.6 | 0.2 | 0.1 | 0.1 | 3,036 | 0.00 |
| 37-9 | Wellsite Compressor | 3.3 | 6.9 | 0.2 | 0.1 | 0.1 | 3,036 | 0.00 |
| 37-10 | Wellsite Compressor | 5.4 | 13.0 | 0.3 | 0.2 | 0.1 | 3,447 | 0.00 |
| 42 | Generator | 0.6 | 0.1 | 2.25E-02 | 0.6 | 1.5 | 72 | 0.00 |
| 43 | Wellsite Compressor | 1.4 | 1.6 | 0.1 | 0.1 | 3.25E-02 | 903 | 0.00 |
| <i>Incinerator</i> | | | | | | | | |
| 26 | Incinerator | 1.0 | 3.3 | 2.3 | 1.0 | 0.8 | 668 | 8.24E-02 |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | |
| 44 | GDF | 0 | 0 | 0 | 1.5 | 0 | 0 | 0 |
| Significant Unit Total | | 87.0 | 920.3 | 7.4 | 36.7 | 9.6 | 59,824 | 0.1 |
| Insignificant Units | | | | | | | | |
| <i>Glycol Reboilers</i> | | | | | | | | |
| N/A | Pad H Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | 5.74E-05 |
| N/A | Pad H Glycol Reboiler #2 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad H Glycol Reboiler #3 | 0.08 | 0.06 | 5.83E-03 | 3.08E-05 | 1.37E-01 | 90 | |
| N/A | Pad A Glycol Reboiler | 0.03 | 0.03 | 2.50E-03 | 1.32E-05 | 5.87E-02 | 38 | |
| N/A | Pad B Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad C Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad C Glycol Reboiler #2 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad D Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad E Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad E Glycol Reboiler #2 | 0.05 | 0.05 | 4.16E-03 | 2.20E-05 | 9.79E-02 | 64 | |
| N/A | Pad F Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad G Glycol Reboiler | 0.22 | 0.18 | 1.66E-02 | 8.79E-05 | 3.92E-01 | 256 | |
| N/A | Pad I Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad J Glycol Reboiler #1 | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| N/A | Pad J Glycol Reboiler #2 | 0.08 | 0.06 | 5.83E-03 | 3.08E-05 | 1.37E-01 | 90 | |
| N/A | Pad J Glycol Reboiler #3 | 0.05 | 0.05 | 4.16E-03 | 2.20E-05 | 9.79E-02 | 64 | |
| N/A | Pad K Glycol Reboiler | 0.11 | 0.09 | 8.32E-03 | 4.40E-05 | 1.96E-01 | 128 | |
| <i>Glycol Dehydration Vents</i> | | | | | | | | |
| N/A | Pad H Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 2.33E-01 | 0.00 | 7.23E-01 | 0.00 |
| N/A | Pad H Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 0.00E+00 | 0.00 | 1.76E+00 | 0.00 |
| N/A | Pad H Glycol Dehydration Vent #3 | 0.00 | 0.00 | 0.00 | 1.08E-02 | 0.00 | 8.85E-01 | 0.00 |
| N/A | Pad A Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 1.70E-01 | 0.00 | 7.31E-01 | 0.00 |
| N/A | Pad B Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 8.00E-04 | 0.00 | 3.24E-01 | 0.00 |
| N/A | Pad C Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 1.31E-01 | 0.00 | 4.33E-01 | 0.00 |
| N/A | Pad C Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 0.00E+00 | 0.00 | 1.89E-01 | 0.00 |
| N/A | Pad D Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 2.60E-03 | 0.00 | 4.19E-01 | 0.00 |
| N/A | Pad E Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 1.50E-01 | 0.00 | 2.81E-01 | 0.00 |
| N/A | Pad E Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 7.23E-02 | 0.00 | 8.32E-02 | 0.00 |
| N/A | Pad F Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 8.00E-04 | 0.00 | 9.46E-01 | 0.00 |
| N/A | Pad G Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 3.87E-01 | 0.00 | 2.60E-01 | 0.00 |
| N/A | Pad I Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 2.76E-01 | 0.00 | 2.06E-01 | 0.00 |
| N/A | Pad J Glycol Dehydration Vent #1 | 0.00 | 0.00 | 0.00 | 2.36E-01 | 0.00 | 1.17E+00 | 0.00 |
| N/A | Pad J Glycol Dehydration Vent #2 | 0.00 | 0.00 | 0.00 | 2.35E-01 | 0.00 | 1.16E+00 | 0.00 |
| N/A | Pad J Glycol Dehydration Vent #3 | 0.00 | 0.00 | 0.00 | 2.70E-03 | 0.00 | 1.41E+00 | 0.00 |
| N/A | Pad K Glycol Dehydration Vent | 0.00 | 0.00 | 0.00 | 1.96E-01 | 0.00 | 2.30E-01 | 0.00 |
| <i>Insignificant Heaters</i> | | | | | | | | |
| 11 | Process Heater | 0.4 | 0.4 | 3.33E-02 | 2.41E-02 | 0.78 | 513 | 1.46E-05 |
| 20 | Process Heater | 0.4 | 0.4 | 3.33E-02 | 2.41E-02 | 0.78 | 513 | 2.78E-05 |
| 25 | Process Heater | 0.1 | 4.60E-02 | 4.16E-03 | 3.01E-03 | 0.10 | 64 | 1.83E-06 |
| 29 | Office Coleman Heater | 2.63E-02 | 2.21E-02 | 2.00E-03 | 1.45E-03 | 0.05 | 31 | 8.78E-07 |
| 30 | Shop Perfection Schwank Heater | 8.76E-03 | 7.36E-03 | 6.66E-04 | 4.82E-04 | 0.02 | 10 | 2.93E-07 |
| 31 | Electrical Shop Modine Heater | 1.31E-02 | 1.10E-02 | 9.99E-04 | 7.23E-04 | 0.02 | 15 | 4.39E-07 |
| 32 | Mechanics Shop Modine Heater | 4.82E-02 | 4.05E-02 | 3.66E-03 | 2.65E-03 | 0.09 | 56 | 1.61E-06 |
| 33 | Mechanics Shop Modine Heater | 0.1 | 0.1 | 9.99E-03 | 7.23E-03 | 0.23 | 154 | 4.39E-06 |
| 34 | BRWD Heater | 0.2 | 0.2 | 1.66E-02 | 1.20E-02 | 0.39 | 256 | 7.31E-06 |
| 35 | Mechanics Shop Used Oil Heater | 0.2 | 0.0 | 2.24E-01 | 1.60E-02 | 3.15E-03 | 358 | 4.01E-03 |
| 36 | Portable Frost Fighter | 0.3 | 0.1 | 4.22E-02 | 8.95E-03 | 2.52E-03 | 287 | 0.00E+00 |
| Insignificant Unit Total | | 1.81 | 1.25 | 0.37 | 0.10 | 2.47 | 2,257.98 | 0.0 |
| Total (Significant and Insignificant) | | 88.8 | 921.6 | 7.8 | 36.8 | 12.0 | 62,082 | 0.1 |
| Major/Minor | | Minor | Major | Minor | Minor | NA | NA | NA |

Table D-1c. Estimated Actual Emissions - Expected Actual Annual Emissions (after controls/limitations)
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Emissions (tons/year) | | | | | | |
|-------------------------------------|------------------------------------|-----------------------|-------------|------------------|------------|-----------------|-------------------|------------|
| | | NO _x | CO | PM ₁₀ | VOC | SO ₂ | CO ₂ e | HAP |
| <i>Significant Units</i> | | | | | | | | |
| <i>Turbines and Engines</i> | | | | | | | | |
| 1 | Turbine Compressor- Out of Solonox | 0 | 0 | 1.3 | 0.4 | 0.8 | 22,207 | 0 |
| 1 | Turbine Compressor- In Solonox | 5.7 | 4.1 | | | | | |
| 2 | Compressor | 0.1 | 0.0 | 1.63E-05 | 2.50E-02 | 8.91E-04 | 25 | 0 |
| 3 | Generator | 0.2 | 0.1 | 9.97E-02 | 9.97E-02 | 1.86E-02 | 16 | 0 |
| 12 | Generator | 0.4 | 0.1 | 2.51E-02 | 2.81E-02 | 1.22E-02 | 13 | 0 |
| 19 | Generator | 3.85E-02 | 8.30E-03 | 2.73E-03 | 3.07E-03 | 1.33E-03 | 1 | 0 |
| 37-1 | Wellsite Compressor | 0.3 | 2.3 | 2.30E-01 | 6.67E-02 | 1.02E-01 | 2,834 | 0 |
| 37-2 | Wellsite Compressor | 0.4 | 4.1 | 2.04E-01 | 5.92E-02 | 9.05E-02 | 2,517 | 0 |
| 37-3 | Wellsite Compressor | 1.1 | 0.4 | 1.09E-01 | 2.22E-02 | 4.85E-02 | 1,347 | 0 |
| 37-4 | Wellsite Compressor | 2.7 | 4.5 | 2.00E-01 | 1.74E-01 | 8.87E-02 | 2,465 | 0 |
| 37-6 | Wellsite Compressor | 0.8 | 1.1 | 1.08E-01 | 0 | 4.81E-02 | 1,337 | 0 |
| 37-7 | Wellsite Compressor | 3.2 | 6.4 | 2.29E-01 | 1.33E-01 | 1.01E-01 | 2,817 | 0 |
| 37-8 | Wellsite Compressor | 3.5 | 5.4 | 2.03E-01 | 1.18E-01 | 9.00E-02 | 2,502 | 0 |
| 37-9 | Wellsite Compressor | 2.7 | 5.7 | 2.03E-01 | 1.18E-01 | 9.01E-02 | 2,506 | 0 |
| 37-10 | Wellsite Compressor | 4.4 | 10.6 | 2.28E-01 | 1.99E-01 | 1.01E-01 | 2,815 | 0 |
| 42 | Generator | 2.68E-02 | 5.65E-03 | 1.08E-03 | 1.56E-03 | 3.98E-03 | 3 | 0 |
| 43 | Wellsite Compressor | 0.8 | 0.9 | 4.14E-02 | 3.61E-02 | 1.84E-02 | 511 | 0 |
| <i>Incinerator</i> | | | | | | | | |
| 26 | Incinerator | 0.01 | 0.02 | 0.01 | 6.11E-03 | 0.01 | 4 | 0 |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | |
| 44 | GDF | 0 | 0 | 0 | 1.45 | 0 | 0 | 0 |
| Significant Unit Total | | 26.3 | 45.7 | 3.2 | 2.9 | 1.6 | 43,921 | 0.0 |

¹ Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Table D-2a. HAPs Summary - Assessable Potential Emissions, with Limits
Hilcorp Alaska, LLC - Beluga River Unit

| Hazardous Air Pollutant | Significant Units | | | | | | | | | | | | | | | | | | Total |
|--|---------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------------|
| | Emissions per Unit (tons) | | | | | | | | | | | | | | | | | | |
| | 1 | 2 | 3 | 12 | 19 | 26 | 37-1 | 37-2 | 37-3 | 37-4 | 37-6 | 37-7 | 37-8 | 37-9 | 37-10 | 42 | 43 | 44 | HAP Emissions |
| Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | |
| Acetaldehyde | 1.08E-02 | 5.91E-04 | 1.51E-04 | 1.26E-04 | 1.80E-05 | ---- | 8.21E-02 | 7.23E-02 | 3.91E-02 | 8.21E-02 | 3.91E-02 | 8.21E-02 | 7.23E-02 | 7.23E-02 | 8.21E-02 | 8.28E-05 | 2.15E-02 | ---- | 6.57E-01 |
| Acrolein | 1.73E-03 | 5.58E-04 | 1.82E-05 | 1.52E-05 | 2.17E-06 | ---- | 7.74E-02 | 6.82E-02 | 3.69E-02 | 7.74E-02 | 3.69E-02 | 7.74E-02 | 6.82E-02 | 6.82E-02 | 7.74E-02 | 9.99E-06 | 2.03E-02 | ---- | 6.11E-01 |
| Benzene | 3.24E-03 | 3.35E-04 | 1.84E-04 | 1.53E-04 | 2.19E-05 | ---- | 4.65E-02 | 4.10E-02 | 2.21E-02 | 4.65E-02 | 2.21E-02 | 4.65E-02 | 4.10E-02 | 4.10E-02 | 4.65E-02 | 1.01E-04 | 1.22E-02 | 1.31E-02 | 3.82E-01 |
| 1,3 Butadiene | ---- | ---- | 7.71E-06 | 6.42E-06 | 9.18E-07 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 4.22E-06 | ---- | ---- | ---- | 1.93E-05 |
| Carbon tetrachloride | ---- | 3.75E-06 | ---- | ---- | ---- | ---- | 5.21E-04 | 4.59E-04 | 2.48E-04 | 5.21E-04 | 2.48E-04 | 5.21E-04 | 4.59E-04 | 4.59E-04 | 5.21E-04 | ---- | 1.36E-04 | ---- | 4.10E-03 |
| Chlorobenzene | ---- | 2.73E-06 | ---- | ---- | ---- | ---- | 3.80E-04 | 3.34E-04 | 1.81E-04 | 3.80E-04 | 1.81E-04 | 3.80E-04 | 3.34E-04 | 3.34E-04 | 3.80E-04 | ---- | 9.94E-05 | ---- | 2.99E-03 |
| Chloroform | ---- | 2.90E-06 | ---- | ---- | ---- | ---- | 4.03E-04 | 3.55E-04 | 1.92E-04 | 4.03E-04 | 1.92E-04 | 4.03E-04 | 3.55E-04 | 3.55E-04 | 4.03E-04 | ---- | 1.06E-04 | ---- | 3.17E-03 |
| Ethyl benzene | 8.63E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.45E-03 | 1.01E-02 |
| Ethylene dibromide (Dibromoethane) | ---- | 4.52E-06 | ---- | ---- | ---- | ---- | 6.27E-04 | 5.52E-04 | 2.99E-04 | 6.27E-04 | 2.99E-04 | 6.27E-04 | 5.52E-04 | 5.52E-04 | 6.27E-04 | ---- | 1.64E-04 | ---- | 4.93E-03 |
| Formaldehyde | 1.92E-01 | 4.35E-03 | 2.33E-04 | 1.94E-04 | 2.77E-05 | ---- | 6.03E-01 | 5.32E-01 | 2.87E-01 | 6.03E-01 | 2.87E-01 | 6.03E-01 | 5.32E-01 | 5.32E-01 | 6.03E-01 | 1.27E-04 | 1.58E-01 | ---- | 4.94E+00 |
| n-Hexane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.32E-02 | 2.32E-02 |
| Hydrochloric acid | ---- | ---- | ---- | ---- | ---- | 2.10E+00 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.10E+00 |
| Methanol | ---- | 6.49E-04 | ---- | ---- | ---- | ---- | 9.01E-02 | 7.93E-02 | 4.29E-02 | 9.01E-02 | 4.29E-02 | 9.01E-02 | 7.93E-02 | 7.93E-02 | 9.01E-02 | ---- | 2.36E-02 | ---- | 7.08E-01 |
| Methylene chloride (Dichloromethane) | ---- | 8.73E-06 | ---- | ---- | ---- | ---- | 1.21E-03 | 1.07E-03 | 5.77E-04 | 1.21E-03 | 5.77E-04 | 1.21E-03 | 1.07E-03 | 1.07E-03 | 1.21E-03 | ---- | 3.18E-04 | ---- | 9.54E-03 |
| Polycyclic Organic Matter (POM) | 5.94E-04 | 2.06E-05 | 3.31E-05 | 2.76E-05 | 3.94E-06 | ---- | 2.86E-03 | 2.52E-03 | 1.36E-03 | 2.86E-03 | 1.36E-03 | 2.86E-03 | 2.52E-03 | 2.52E-03 | 2.86E-03 | 1.81E-05 | 7.49E-04 | 7.26E-03 | 3.04E-02 |
| Naphthalene | 3.51E-04 | 2.06E-05 | ---- | ---- | ---- | ---- | 2.86E-03 | 2.52E-03 | 1.36E-03 | 2.86E-03 | 1.36E-03 | 2.86E-03 | 2.52E-03 | 2.52E-03 | 2.86E-03 | ---- | 7.49E-04 | ---- | 2.28E-02 |
| Styrene | ---- | 2.52E-06 | ---- | ---- | ---- | ---- | 3.50E-04 | 3.09E-04 | 1.67E-04 | 3.50E-04 | 1.67E-04 | 3.50E-04 | 3.09E-04 | 3.09E-04 | 3.50E-04 | ---- | 9.17E-05 | ---- | 2.75E-03 |
| Toluene | 3.51E-02 | 1.18E-04 | 8.06E-05 | 6.72E-05 | 9.60E-06 | ---- | 1.64E-02 | 1.45E-02 | 7.82E-03 | 1.64E-02 | 7.82E-03 | 1.64E-02 | 1.45E-02 | 1.45E-02 | 1.64E-02 | 4.42E-05 | 4.30E-03 | 1.89E-02 | 1.83E-01 |
| 2,2,4-Trimethylpentane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.16E-02 | 1.16E-02 |
| Vinyl chloride | ---- | 1.52E-06 | ---- | ---- | ---- | ---- | 2.11E-04 | 1.86E-04 | 1.01E-04 | 2.11E-04 | 1.01E-04 | 2.11E-04 | 1.86E-04 | 1.86E-04 | 2.11E-04 | ---- | 5.53E-05 | ---- | 1.66E-03 |
| Xylenes (isomers and mixture) | 1.73E-02 | 4.13E-05 | 5.62E-05 | 4.68E-05 | 6.69E-06 | ---- | 5.74E-03 | 5.06E-03 | 2.73E-03 | 5.74E-03 | 2.73E-03 | 5.74E-03 | 5.06E-03 | 5.06E-03 | 5.74E-03 | 3.08E-05 | 1.50E-03 | 7.26E-03 | 6.98E-02 |
| Total VOC HAPs | 0.27 | 0.01 | 0.00 | 0.00 | 0.00 | 2.10 | 0.93 | 0.82 | 0.44 | 0.93 | 0.44 | 0.93 | 0.82 | 0.82 | 0.93 | 0.00 | 0.24 | 0.08 | 9.76 |
| Non Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | |
| Arsenic Compounds (inorganic including arsine) | ---- | ---- | ---- | ---- | ---- | 1.44E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.44E-03 |
| Cadmium Compounds | ---- | ---- | ---- | ---- | ---- | 3.58E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 3.58E-03 |
| Chromium Compounds | ---- | ---- | ---- | ---- | ---- | 2.95E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.95E-03 |
| Cobalt Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 0.00E+00 |
| Lead Compounds | ---- | ---- | ---- | ---- | ---- | 7.00E-02 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 7.00E-02 |
| Manganese Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 0.00E+00 |
| Mercury Compounds | ---- | ---- | ---- | ---- | ---- | 1.84E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.84E-03 |
| Nickel Compounds | ---- | ---- | ---- | ---- | ---- | 2.58E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.58E-03 |
| Total non-VOC HAPs | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.24E-02 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.08 |
| Total HAPs | 0.27 | 0.01 | 0.00 | 0.00 | 0.00 | 2.18 | 0.93 | 0.82 | 0.44 | 0.93 | 0.44 | 0.93 | 0.82 | 0.82 | 0.93 | 0.00 | 0.24 | 0.08 | 9.84 |

Notes:

¹ See individual emissions unit category emissions calculations for details on methodology and assumptions.

**Table D-2b. HAPs Summary - Assessable Potential Emissions, with Limits
Hilcorp Alaska, LLC - Beluga River Unit**

| Hazardous Air Pollutant | Insignificant Units | | | | | | | | | | | | Total |
|--|---------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|---------------|
| | Emissions per Unit (tons) | | | | | | | | | | | | HAP Emissions |
| | Insignificant Reboilers | 11 | 20 | 25 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | |
| Volatile Organic Compounds | | | | | | | | | | | | | |
| Benzene | 3.61E-05 | 9.20E-06 | 9.20E-06 | 1.15E-06 | 5.52E-07 | 1.84E-07 | 2.76E-07 | 1.01E-06 | 2.76E-06 | 4.60E-06 | ---- | 2.74E-06 | 6.78E-05 |
| Formaldehyde | 1.29E-03 | 3.29E-04 | 3.29E-04 | 4.11E-05 | 1.97E-05 | 6.57E-06 | 9.86E-06 | 3.61E-05 | 9.86E-05 | 1.64E-04 | ---- | 4.22E-04 | 2.74E-03 |
| n-Hexane | 3.09E-02 | 7.88E-03 | 7.88E-03 | 9.86E-04 | 4.73E-04 | 1.58E-04 | 2.37E-04 | 8.67E-04 | 2.37E-03 | 3.94E-03 | ---- | ---- | 5.57E-02 |
| Nitrobenzene | 3.61E-05 | 9.20E-06 | 9.20E-06 | 1.15E-06 | 5.52E-07 | 1.84E-07 | 2.76E-07 | 1.01E-06 | 2.76E-06 | 4.60E-06 | ---- | ---- | 6.50E-05 |
| Phenol | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 3.84E-05 | ---- | 3.84E-05 |
| Phosphorus | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 5.75E-04 | ---- | 5.75E-04 |
| Polycyclic Organic Matter (POM) | 1.05E-05 | 2.67E-06 | 2.67E-06 | 3.34E-07 | 1.60E-07 | 5.34E-08 | 8.02E-08 | 2.94E-07 | 8.02E-07 | 1.34E-06 | 2.08E-04 | 6.40E-07 | 2.27E-04 |
| Naphthalene | 1.05E-05 | 2.67E-06 | 2.67E-06 | 3.34E-07 | 1.60E-07 | 5.34E-08 | 8.02E-08 | 2.94E-07 | 8.02E-07 | 1.34E-06 | 2.08E-04 | 1.45E-05 | 2.41E-04 |
| Toluene | 5.85E-05 | 1.49E-05 | 1.49E-05 | 1.86E-06 | 8.94E-07 | 2.98E-07 | 4.47E-07 | 1.64E-06 | 4.47E-06 | 7.45E-06 | ---- | 7.93E-05 | 1.85E-04 |
| Total VOC HAPs | 3.24E-02 | 8.25E-03 | 8.25E-03 | 1.03E-03 | 4.95E-04 | 1.65E-04 | 2.47E-04 | 9.07E-04 | 2.47E-03 | 4.12E-03 | 8.57E-04 | 5.07E-04 | 0.06 |
| Non Volatile Organic Compounds | | | | | | | | | | | | | |
| Antimony Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 5.44E-06 | ---- | 5.44E-06 |
| Arsenic Compounds (inorganic including arsine) | 3.44E-06 | 8.76E-07 | 8.76E-07 | 1.10E-07 | 5.26E-08 | 1.75E-08 | 2.63E-08 | 9.64E-08 | 2.63E-07 | 4.38E-07 | 4.00E-05 | ---- | 4.62E-05 |
| Cadmium Compounds | 1.89E-05 | 4.82E-06 | 4.82E-06 | 6.02E-07 | 2.89E-07 | 9.64E-08 | 1.45E-07 | 5.30E-07 | 1.45E-06 | 2.41E-06 | 2.40E-06 | ---- | 3.65E-05 |
| Chromium Compounds | 2.41E-05 | 6.13E-06 | 1.93E-05 | 7.67E-07 | 3.68E-07 | 1.23E-07 | 1.84E-07 | 6.75E-07 | 1.84E-06 | 3.07E-06 | 3.04E-03 | ---- | 3.09E-03 |
| Cobalt Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 9.11E-05 | ---- | 9.11E-05 |
| Manganese Compounds | 6.53E-06 | 1.66E-06 | 1.66E-06 | 2.08E-07 | 9.99E-08 | 3.33E-08 | 4.99E-08 | 1.83E-07 | 4.99E-07 | 8.32E-07 | 3.52E-05 | ---- | 4.69E-05 |
| Mercury Compounds | 4.47E-06 | 1.14E-06 | 1.14E-06 | 1.42E-07 | 6.83E-08 | 2.28E-08 | 3.42E-08 | 1.25E-07 | 3.42E-07 | 5.69E-07 | ---- | ---- | 8.05E-06 |
| Nickel Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 7.99E-04 | ---- | 7.99E-04 |
| Total non-VOC HAPs | 5.74E-05 | 1.46E-05 | 2.78E-05 | 1.83E-06 | 8.78E-07 | 2.93E-07 | 4.39E-07 | 1.61E-06 | 4.39E-06 | 7.31E-06 | 4.01E-03 | 0.00E+00 | 0.00 |
| Total HAPs | 3.24E-02 | 8.26E-03 | 8.28E-03 | 1.03E-03 | 4.96E-04 | 1.65E-04 | 2.48E-04 | 9.09E-04 | 2.48E-03 | 4.13E-03 | 4.86E-03 | 5.07E-04 | 0.06 |

Notes:

- ¹ See individual emissions unit category emissions calculations for details on methodology and assumptions.
- ² Insignificant glycol dehydrators vents have zero HAP emissions. See GRI-GlyCalc Summary for more details.

Table D-2c. HAPs Summary - Unlimited Potential Emissions, without Limits
Hilcorp Alaska, LLC - Beluga River Unit

| Hazardous Air Pollutant | Significant Units | | | | | | | | | | | | | | | | | | Total HAP Emissions | |
|--|---------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|---------------------------|----------|
| | Emissions per Unit (tons) | | | | | | | | | | | | | | | | | | | |
| | 1 | 2 | 3 | 12 | 19 | 26 | 37-1 | 37-2 | 37-3 | 37-4 | 37-6 | 37-7 | 37-8 | 37-9 | 37-10 | 42 | 43 | 44 | | |
| Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | | |
| Acetaldehyde | 1.08E-02 | 2.96E-03 | 3.85E-05 | 6.30E-04 | 9.00E-05 | ---- | 8.21E-02 | 7.23E-02 | 3.91E-02 | 8.21E-02 | 3.91E-02 | 8.21E-02 | 7.23E-02 | 7.23E-02 | 8.21E-02 | 4.14E-04 | 2.15E-02 | ---- | 6.60E-01 | |
| Acrolein | 1.73E-03 | 2.79E-03 | 9.12E-05 | 7.60E-05 | 1.09E-05 | ---- | 7.74E-02 | 6.82E-02 | 3.69E-02 | 7.74E-02 | 3.69E-02 | 7.74E-02 | 6.82E-02 | 6.82E-02 | 7.74E-02 | 4.99E-05 | 2.03E-02 | ---- | 6.13E-01 | |
| Benzene | 3.24E-03 | 1.67E-03 | 9.20E-04 | 7.66E-04 | 1.09E-04 | ---- | 4.65E-02 | 4.10E-02 | 2.21E-02 | 4.65E-02 | 2.21E-02 | 4.65E-02 | 4.10E-02 | 4.10E-02 | 4.65E-02 | 5.04E-04 | 1.22E-02 | 1.31E-02 | 3.86E-01 | |
| 1,3 Butadiene | ---- | ---- | 3.85E-05 | 3.21E-05 | 4.59E-06 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.11E-05 | ---- | ---- | 9.63E-05 | |
| Carbon tetrachloride | ---- | 1.88E-05 | ---- | ---- | ---- | ---- | 5.21E-04 | 4.59E-04 | 2.48E-04 | 5.21E-04 | 2.48E-04 | 5.21E-04 | 4.59E-04 | 4.59E-04 | 5.21E-04 | ---- | 1.36E-04 | ---- | 4.11E-03 | |
| Chlorobenzene | ---- | 1.37E-05 | ---- | ---- | ---- | ---- | 3.80E-04 | 3.34E-04 | 1.81E-04 | 3.80E-04 | 1.81E-04 | 3.80E-04 | 3.34E-04 | 3.34E-04 | 3.80E-04 | ---- | 9.94E-05 | ---- | 3.00E-03 | |
| Chloroform | ---- | 1.45E-05 | ---- | ---- | ---- | ---- | 4.03E-04 | 3.55E-04 | 1.92E-04 | 4.03E-04 | 1.92E-04 | 4.03E-04 | 3.55E-04 | 3.55E-04 | 4.03E-04 | ---- | 1.06E-04 | ---- | 3.18E-03 | |
| Ethyl benzene | 8.63E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.45E-03 | 1.01E-02 | |
| Ethylene dibromide (Dibromoethane) | ---- | 2.26E-05 | ---- | ---- | ---- | ---- | 6.27E-04 | 5.52E-04 | 2.99E-04 | 6.27E-04 | 2.99E-04 | 6.27E-04 | 5.52E-04 | 5.52E-04 | 6.27E-04 | ---- | 1.64E-04 | ---- | 4.95E-03 | |
| Formaldehyde | 1.92E-01 | 2.17E-02 | 1.16E-03 | 9.69E-04 | 1.38E-04 | ---- | 6.03E-01 | 5.32E-01 | 2.87E-01 | 6.03E-01 | 2.87E-01 | 6.03E-01 | 5.32E-01 | 5.32E-01 | 6.03E-01 | 6.37E-04 | 1.58E-01 | ---- | 4.96E+00 | |
| n-Hexane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.32E-02 | 2.32E-02 |
| Hydrochloric acid | ---- | ---- | ---- | ---- | ---- | 2.10E+00 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.10E+00 |
| Methanol | ---- | 3.24E-03 | ---- | ---- | ---- | ---- | 9.01E-02 | 7.93E-02 | 4.29E-02 | 9.01E-02 | 4.29E-02 | 9.01E-02 | 7.93E-02 | 7.93E-02 | 9.01E-02 | ---- | 2.36E-02 | ---- | 7.11E-01 | |
| Methylene chloride (Dichloromethane) | ---- | 4.37E-05 | ---- | ---- | ---- | ---- | 1.21E-03 | 1.07E-03 | 5.77E-04 | 1.21E-03 | 5.77E-04 | 1.21E-03 | 1.07E-03 | 1.07E-03 | 1.21E-03 | ---- | 3.18E-04 | ---- | 9.57E-03 | |
| Polycyclic Organic Matter (POM) | 5.94E-04 | 1.03E-04 | 1.66E-04 | 1.38E-04 | 1.97E-05 | ---- | 2.86E-03 | 2.52E-03 | 1.36E-03 | 2.86E-03 | 1.36E-03 | 2.86E-03 | 2.52E-03 | 2.52E-03 | 2.86E-03 | 9.07E-05 | 7.49E-04 | 7.26E-03 | 3.08E-02 | |
| Naphthalene | 3.51E-04 | 1.03E-04 | ---- | ---- | ---- | ---- | 2.86E-03 | 2.52E-03 | 1.36E-03 | 2.86E-03 | 1.36E-03 | 2.86E-03 | 2.52E-03 | 2.52E-03 | 2.86E-03 | ---- | 7.49E-04 | ---- | 2.29E-02 | |
| Styrene | ---- | 1.26E-05 | ---- | ---- | ---- | ---- | 3.50E-04 | 3.09E-04 | 1.67E-04 | 3.50E-04 | 1.67E-04 | 3.50E-04 | 3.09E-04 | 3.09E-04 | 3.50E-04 | ---- | 9.17E-05 | ---- | 2.76E-03 | |
| Toluene | 3.51E-02 | 5.91E-04 | 4.03E-04 | 3.36E-04 | 4.80E-05 | ---- | 1.64E-02 | 1.45E-02 | 7.82E-03 | 1.64E-02 | 7.82E-03 | 1.64E-02 | 1.45E-02 | 1.45E-02 | 1.64E-02 | 2.21E-04 | 4.30E-03 | 1.89E-02 | 1.85E-01 | |
| 2,2,4-Trimethylpentane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.16E-02 | 1.16E-02 |
| Vinyl chloride | ---- | 7.61E-06 | ---- | ---- | ---- | ---- | 2.11E-04 | 1.86E-04 | 1.01E-04 | 2.11E-04 | 1.01E-04 | 2.11E-04 | 1.86E-04 | 1.86E-04 | 2.11E-04 | ---- | 5.53E-05 | ---- | 1.67E-03 | |
| Xylenes (isomers and mixture) | 1.73E-02 | 2.07E-04 | 2.81E-04 | 2.34E-04 | 3.34E-05 | ---- | 5.74E-03 | 5.06E-03 | 2.73E-03 | 5.74E-03 | 2.73E-03 | 5.74E-03 | 5.06E-03 | 5.06E-03 | 5.74E-03 | 1.54E-04 | 1.50E-03 | 7.26E-03 | 7.05E-02 | |
| Total VOC HAPs | 0.27 | 0.03 | 0.00 | 0.00 | 0.00 | 2.10 | 0.93 | 0.82 | 0.44 | 0.93 | 0.44 | 0.93 | 0.82 | 0.82 | 0.93 | 0.00 | 0.24 | 0.08 | 9.79E+00 | |
| Non Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | | |
| Arsenic Compounds (inorganic including arsine) | ---- | ---- | ---- | ---- | ---- | 1.44E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.44E-03 |
| Cadmium Compounds | ---- | ---- | ---- | ---- | ---- | 3.58E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 3.58E-03 |
| Chromium Compounds | ---- | ---- | ---- | ---- | ---- | 2.95E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.95E-03 |
| Lead Compounds | ---- | ---- | ---- | ---- | ---- | 7.00E-02 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 7.00E-02 |
| Mercury Compounds | ---- | ---- | ---- | ---- | ---- | 1.84E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.84E-03 |
| Nickel Compounds | ---- | ---- | ---- | ---- | ---- | 2.58E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.58E-03 |
| Total non-VOC HAPs | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.24E-02 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 8.24E-02 |
| Total HAPs | 0.27 | 0.03 | 0.00 | 0.00 | 0.00 | 2.18 | 0.93 | 0.82 | 0.44 | 0.93 | 0.44 | 0.93 | 0.82 | 0.82 | 0.93 | 0.00 | 0.24 | 0.08 | 9.87E+00 | |

Notes:
¹ See individual emissions unit category emissions calculations for details on methodology and assumptions.

Table D-2d. HAPs Summary - Unlimited Potential Emissions, without Limits
Hilcorp Alaska, LLC - Beluga River Unit

| Hazardous Air Pollutant | Insignificant Units | | | | | | | | | | | | Total |
|--|---------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | Emissions per Unit (tons) | | | | | | | | | | | | |
| | Insignificant Reboilers | 11 | 20 | 25 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | HAP Emissions |
| Volatile Organic Compounds | | | | | | | | | | | | | |
| Benzene | 3.97E-04 | 9.20E-06 | 9.20E-06 | 1.15E-06 | 5.52E-07 | 1.84E-07 | 2.76E-07 | 1.01E-06 | 2.76E-06 | 4.60E-06 | ---- | 2.74E-06 | 4.29E-04 |
| 1,4-Dichlorobenzene(p) | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.28E-08 | ---- | 1.28E-08 |
| Ethyl benzene | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 8.13E-07 | 8.13E-07 |
| Formaldehyde | 1.42E-02 | 3.29E-04 | 3.29E-04 | 4.11E-05 | 1.97E-05 | 6.57E-06 | 9.86E-06 | 3.61E-05 | 9.86E-05 | 1.64E-04 | ---- | 4.22E-04 | 1.56E-02 |
| n-Hexane | 3.40E-01 | 7.88E-03 | 7.88E-03 | 9.86E-04 | 4.73E-04 | 1.58E-04 | 2.37E-04 | 8.67E-04 | 2.37E-03 | 3.94E-03 | ---- | ---- | 3.65E-01 |
| Nitrobenzene | 3.97E-04 | 9.20E-06 | 9.20E-06 | 1.15E-06 | 5.52E-07 | 1.84E-07 | 2.76E-07 | 1.01E-06 | 2.76E-06 | 4.60E-06 | ---- | ---- | 4.26E-04 |
| Phenol | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 3.84E-05 | ---- | 3.84E-05 |
| Phosphorus | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 5.75E-04 | ---- | 5.75E-04 |
| Polycyclic Organic Matter (POM) | 1.15E-04 | 2.67E-06 | 2.67E-06 | 3.34E-07 | 1.60E-07 | 5.34E-08 | 8.02E-08 | 2.94E-07 | 8.02E-07 | 1.34E-06 | 2.08E-04 | 6.40E-07 | 3.32E-04 |
| Naphthalene | 1.15E-04 | 2.67E-06 | 2.67E-06 | 3.34E-07 | 1.60E-07 | 5.34E-08 | 8.02E-08 | 2.94E-07 | 8.02E-07 | 1.34E-06 | 2.08E-04 | 1.45E-05 | 3.46E-04 |
| Toluene | 6.43E-04 | 1.49E-05 | 1.49E-05 | 1.86E-06 | 8.94E-07 | 2.98E-07 | 4.47E-07 | 1.64E-06 | 4.47E-06 | 7.45E-06 | ---- | 7.93E-05 | 7.69E-04 |
| Xylenes (isomers and mixture) | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.39E-06 | 1.39E-06 |
| Total VOC HAPs | 3.56E-01 | 8.25E-03 | 8.25E-03 | 1.03E-03 | 4.95E-04 | 1.65E-04 | 2.47E-04 | 9.07E-04 | 2.47E-03 | 4.12E-03 | 8.57E-04 | 5.07E-04 | 3.83E-01 |
| Non Volatile Organic Compounds | | | | | | | | | | | | | |
| Antimony Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 5.44E-06 | ---- | 5.44E-06 |
| Arsenic Compounds (inorganic including arsine) | 3.78E-05 | 8.76E-07 | 8.76E-07 | 1.10E-07 | 5.26E-08 | 1.75E-08 | 2.63E-08 | 9.64E-08 | 2.63E-07 | 4.38E-07 | 4.00E-05 | ---- | 8.05E-05 |
| Cadmium Compounds | 2.08E-04 | 4.82E-06 | 4.82E-06 | 6.02E-07 | 2.89E-07 | 9.64E-08 | 1.45E-07 | 5.30E-07 | 1.45E-06 | 2.41E-06 | 2.40E-06 | ---- | 2.26E-04 |
| Chromium Compounds | 2.65E-04 | 6.13E-06 | 1.93E-05 | 7.67E-07 | 3.68E-07 | 1.23E-07 | 1.84E-07 | 6.75E-07 | 1.84E-06 | 3.07E-06 | 3.04E-03 | ---- | 3.33E-03 |
| Cobalt Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 9.11E-05 | ---- | 9.11E-05 |
| Manganese Compounds | 7.19E-05 | 1.66E-06 | 1.66E-06 | 2.08E-07 | 9.99E-08 | 3.33E-08 | 4.99E-08 | 1.83E-07 | 4.99E-07 | 8.32E-07 | 3.52E-05 | ---- | 1.12E-04 |
| Mercury Compounds | 4.92E-05 | 1.14E-06 | 1.14E-06 | 1.42E-07 | 6.83E-08 | 2.28E-08 | 3.42E-08 | 1.25E-07 | 3.42E-07 | 5.69E-07 | ---- | ---- | 5.27E-05 |
| Nickel Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 7.99E-04 | ---- | 7.99E-04 |
| Total non-VOC HAPs | 6.32E-04 | 1.46E-05 | 2.78E-05 | 1.83E-06 | 8.78E-07 | 2.93E-07 | 4.39E-07 | 1.61E-06 | 4.39E-06 | 7.31E-06 | 4.01E-03 | 0.00E+00 | 4.70E-03 |
| Total HAPs | 3.57E-01 | 8.26E-03 | 8.28E-03 | 1.03E-03 | 4.96E-04 | 1.65E-04 | 2.48E-04 | 9.09E-04 | 2.48E-03 | 4.13E-03 | 4.86E-03 | 5.07E-04 | 3.88E-01 |

Notes:

- ¹ See individual emissions unit category emissions calculations for details on methodology and assumptions.
- ² Insignificant glycol dehydrator vents have zero HAP emissions. See GRI-GlyCalc Summary for more details.

Table D-2e. HAPs Summary - Estimated Actual Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| Hazardous Air Pollutant | Significant Units | | | | | | | | | | | | | | | | | | Total |
|--|---------------------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|-----------------|
| | Emissions per Unit (tons) | | | | | | | | | | | | | | | | | | |
| | 1 | 2 | 3 | 12 | 19 | 26 | 37-1 | 37-2 | 37-3 | 37-4 | 37-6 | 37-7 | 37-8 | 37-9 | 37-10 | 42 | 43 | 44 | HAP Emissions |
| Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | |
| Acetaldehyde | 7.59E-03 | 5.90E-04 | 4.74E-06 | 6.12E-05 | 6.67E-06 | ---- | 5.91E-02 | 5.25E-02 | 2.81E-02 | 5.14E-02 | 2.79E-02 | 5.87E-02 | 5.22E-02 | 5.22E-02 | 5.87E-02 | 1.99E-05 | 1.22E-02 | ---- | 4.61E-01 |
| Acrolein | 1.21E-03 | 5.56E-04 | 1.12E-05 | 7.38E-06 | 8.04E-07 | ---- | 5.57E-02 | 4.95E-02 | 2.65E-02 | 4.84E-02 | 2.63E-02 | 5.54E-02 | 4.92E-02 | 4.93E-02 | 5.53E-02 | 2.40E-06 | 1.15E-02 | ---- | 4.29E-01 |
| Benzene | 2.28E-03 | 3.34E-04 | 1.13E-04 | 7.44E-05 | 8.11E-06 | ---- | 3.35E-02 | 2.97E-02 | 1.59E-02 | 2.91E-02 | 1.58E-02 | 3.33E-02 | 2.95E-02 | 2.96E-02 | 3.32E-02 | 2.42E-05 | 6.89E-03 | 1.31E-02 | 2.72E-01 |
| 1,3 Butadiene | ---- | ---- | 4.74E-06 | 3.12E-06 | 3.40E-07 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.02E-06 | ---- | ---- | 9.22E-06 |
| Carbon tetrachloride | ---- | 3.74E-06 | ---- | ---- | ---- | ---- | 3.75E-04 | 3.33E-04 | 1.78E-04 | 3.26E-04 | 1.77E-04 | 3.73E-04 | 3.31E-04 | 3.31E-04 | 3.72E-04 | ---- | 7.72E-05 | ---- | 2.88E-03 |
| Chlorobenzene | ---- | 2.73E-06 | ---- | ---- | ---- | ---- | 2.73E-04 | 2.43E-04 | 1.30E-04 | 2.38E-04 | 1.29E-04 | 2.72E-04 | 2.41E-04 | 2.42E-04 | 2.71E-04 | ---- | 5.63E-05 | ---- | 2.10E-03 |
| Chloroform | ---- | 2.90E-06 | ---- | ---- | ---- | ---- | 2.90E-04 | 2.58E-04 | 1.38E-04 | 2.52E-04 | 1.37E-04 | 2.88E-04 | 2.56E-04 | 2.57E-04 | 2.88E-04 | ---- | 5.97E-05 | ---- | 2.23E-03 |
| Ethyl benzene | 6.07E-03 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.45E-03 | 7.52E-03 |
| Ethylene dibromide (Dibromoethane) | ---- | 4.51E-06 | ---- | ---- | ---- | ---- | 4.51E-04 | 4.01E-04 | 2.14E-04 | 3.92E-04 | 2.13E-04 | 4.48E-04 | 3.98E-04 | 3.99E-04 | 4.48E-04 | ---- | 9.29E-05 | ---- | 3.46E-03 |
| Formaldehyde | 1.35E-01 | 4.34E-03 | 1.43E-04 | 9.41E-05 | 1.03E-05 | ---- | 4.34E-01 | 3.86E-01 | 2.06E-01 | 3.78E-01 | 2.05E-01 | 4.31E-01 | 3.83E-01 | 3.84E-01 | 4.31E-01 | 3.06E-05 | 8.94E-02 | ---- | 3.47E+00 |
| n-Hexane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.32E-02 | 2.32E-02 |
| Hydrochloric acid | ---- | ---- | ---- | ---- | ---- | 1.30E-02 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.30E-02 |
| Methanol | ---- | 6.47E-04 | ---- | ---- | ---- | ---- | 6.48E-02 | 5.76E-02 | 3.08E-02 | 5.64E-02 | 3.06E-02 | 6.44E-02 | 5.72E-02 | 5.73E-02 | 6.44E-02 | ---- | 1.33E-02 | ---- | 4.97E-01 |
| Methylene chloride (Dichloromethane) | ---- | 8.72E-06 | ---- | ---- | ---- | ---- | 8.73E-04 | 7.75E-04 | 4.15E-04 | 7.59E-04 | 4.12E-04 | 8.67E-04 | 7.70E-04 | 7.72E-04 | 8.67E-04 | ---- | 1.80E-04 | ---- | 6.70E-03 |
| Polycyclic Organic Matter (POM) | 4.17E-04 | 2.05E-05 | 2.04E-05 | 1.34E-05 | 1.46E-06 | ---- | 2.06E-03 | 1.83E-03 | 9.78E-04 | 1.79E-03 | 9.70E-04 | 2.04E-03 | 1.82E-03 | 1.82E-03 | 2.04E-03 | 4.36E-06 | 4.23E-04 | 7.26E-03 | 2.35E-02 |
| Naphthalene | 2.47E-04 | 2.05E-05 | ---- | ---- | ---- | ---- | 2.06E-03 | 1.83E-03 | 9.78E-04 | 1.79E-03 | 9.70E-04 | 2.04E-03 | 1.82E-03 | 1.82E-03 | 2.04E-03 | ---- | 4.23E-04 | ---- | 1.60E-02 |
| Styrene | ---- | 2.52E-06 | ---- | ---- | ---- | ---- | 2.52E-04 | 2.24E-04 | 1.20E-04 | 2.19E-04 | 1.19E-04 | 2.50E-04 | 2.22E-04 | 2.23E-04 | 2.50E-04 | ---- | 5.19E-05 | ---- | 1.93E-03 |
| Toluene | 2.47E-02 | 1.18E-04 | 4.96E-05 | 3.26E-05 | 3.56E-06 | ---- | 1.18E-02 | 1.05E-02 | 5.62E-03 | 1.03E-02 | 5.57E-03 | 1.17E-02 | 1.04E-02 | 1.04E-02 | 1.17E-02 | 1.06E-05 | 2.43E-03 | 1.89E-02 | 1.34E-01 |
| 2,2,4-Trimethylpentane | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.16E-02 | 1.16E-02 |
| Vinyl chloride | ---- | 1.52E-06 | ---- | ---- | ---- | ---- | 1.52E-04 | 1.35E-04 | 7.23E-05 | 1.32E-04 | 7.17E-05 | 1.51E-04 | 1.34E-04 | 1.34E-04 | 1.51E-04 | ---- | 3.13E-05 | ---- | 1.17E-03 |
| Xylenes (isomers and mixture) | 1.21E-02 | 4.13E-05 | 3.46E-05 | 2.27E-05 | 2.48E-06 | ---- | 4.13E-03 | 3.67E-03 | 1.96E-03 | 3.59E-03 | 1.95E-03 | 4.10E-03 | 3.65E-03 | 3.65E-03 | 4.10E-03 | 7.40E-06 | 8.50E-04 | 7.26E-03 | 5.12E-02 |
| Total VOC HAPs | 0.19 | 0.01 | 0.00 | 0.00 | 0.00 | 0.01 | 0.67 | 0.59 | 0.32 | 0.58 | 0.32 | 0.66 | 0.59 | 0.59 | 0.66 | 0.00 | 0.14 | 0.08 | 5.41E+00 |
| Non Volatile Organic Compounds | | | | | | | | | | | | | | | | | | | |
| Arsenic Compounds (inorganic including arsine) | ---- | ---- | ---- | ---- | ---- | 8.90E-06 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 8.90E-06 |
| Cadmium Compounds | ---- | ---- | ---- | ---- | ---- | 2.22E-05 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 2.22E-05 |
| Chromium Compounds | ---- | ---- | ---- | ---- | ---- | 1.83E-05 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.83E-05 |
| Cobalt Compounds | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 0.00E+00 |
| Lead Compounds | ---- | ---- | ---- | ---- | ---- | 4.34E-04 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 4.34E-04 |
| Mercury Compounds | ---- | ---- | ---- | ---- | ---- | 1.14E-05 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.14E-05 |
| Nickel Compounds | ---- | ---- | ---- | ---- | ---- | 1.60E-05 | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | ---- | 1.60E-05 |
| Total non-VOC HAPs | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.10E-04 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 0.00E+00 | 5.10E-04 |
| Total HAPs | 0.19 | 0.01 | 0.00 | 0.00 | 0.00 | 0.01 | 0.67 | 0.59 | 0.32 | 0.58 | 0.32 | 0.66 | 0.59 | 0.59 | 0.66 | 0.00 | 0.14 | 0.08 | 5.41 |

Notes:

¹ See individual emissions unit category emissions calculations for details on methodology and assumptions.

² Because insignificant tank VOC emissions are so small, it is assumed that the HAP emissions from each tank and from all tanks combined is negligible. See VOC calculations for details.

Table D-3a. Significant Emission Unit Inventory - NO_x Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|------------------------------------|--------------------|-----------------|--------------------|----------------------------------|--|--------------------------------|---------------------------|---------------------|-----------------|
| | | | | | | | | NO _x Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | |
| 1 | Turbine Compressor- Out of Solonox | Source Test | 0.2 lb/MMBtu | 7,700 hp | 400 hr/yr | 8,760 hr/yr ⁴ | 0.0 hr/yr | 2.5 tpy | 54.0 tpy | 0 tpy |
| 1 | Turbine Compressor- In Solonox | Source Test | 1.84 lb/hr | 7,700 hp | 8,360 hr/yr | 8,760 hr/yr | 6,157.4 hr/yr | 7.7 tpy | 5.66 tpy | 5.66 tpy |
| 2 | Compressor | Vendor Data | 2 ghp-hr | 530 hp | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 99.8 hr/yr | 0.1 tpy | 0.6 tpy | 0.12 tpy |
| 3 | Generator | Vendor Data | 6.4 gkW-hr | 420 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 61.6 hr/yr | 0.3 tpy | 1.5 tpy | 0.18 tpy |
| 12 | Generator | AP-42 Table 3.3-1 | 0.031 lb/hp-hr | 350 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 48.6 hr/yr | 0.7 tpy | 3.6 tpy | 0.35 tpy |
| 19 | Generator | AP-42 Table 3.3-1 | 0.031 lb/hp-hr | 50 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 37.1 hr/yr | 0.1 tpy | 0.5 tpy | 0.04 tpy |
| 37-1 | Wellsite Compressor | Source Test | 0.05 ghp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204.1 hr/yr | 0.4 tpy | 0.4 tpy | 0.33 tpy |
| 37-2 | Wellsite Compressor | Source Test | 0.06 ghp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,261.5 hr/yr | 0.4 tpy | 0.4 tpy | 0.36 tpy |
| 37-3 | Wellsite Compressor | Source Test | 0.34 ghp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,191.7 hr/yr | 1.3 tpy | 1.3 tpy | 1.08 tpy |
| 37-4 | Wellsite Compressor | Source Test | 0.47 ghp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,265.7 hr/yr | 3.8 tpy | 3.8 tpy | 2.73 tpy |
| 37-6 | Wellsite Compressor | Source Test | 0.27 ghp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135.4 hr/yr | 1.0 tpy | 1.0 tpy | 0.85 tpy |
| 37-7 | Wellsite Compressor | Source Test | 0.49 ghp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159.1 hr/yr | 4.0 tpy | 4.0 tpy | 3.25 tpy |
| 37-8 | Wellsite Compressor | Source Test | 0.59 ghp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,217.8 hr/yr | 4.2 tpy | 4.2 tpy | 3.47 tpy |
| 37-9 | Wellsite Compressor | Source Test | 0.46 ghp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230.4 hr/yr | 3.3 tpy | 3.3 tpy | 2.71 tpy |
| 37-10 | Wellsite Compressor | Source Test | 0.66 ghp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,154.7 hr/yr | 5.4 tpy | 5.4 tpy | 4.37 tpy |
| 42 | Generator | Vendor Data | 2.23 lb/hr | 230 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 24.1 hr/yr | 0.1 tpy | 0.6 tpy | 0.03 tpy |
| 43 | Wellsite Compressor | Source Test | 0.66 ghp-hr | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,955.6 hr/yr | 1.4 tpy | 1.4 tpy | 0.79 tpy |
| <i>Incinerator</i> | | | | | | | | | | |
| 26 | Incinerator | AP-42 Table 2.1-12 | 3 lb/ton | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54.3 hr/yr | 1.0 tpy | 1.0 tpy | 0.01 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | |
| 44 | GDF | N/A | N/A | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 0 tpy | 0 tpy | 0 tpy |
| Totals | | | | | | | | 37.7 tpy | 87.0 tpy | 26.3 tpy |

- Notes:
- Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
 - Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
 - Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
 - EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
 - EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
 - Unlimited potential emissions for the SoLoNOx turbine is calculated as full-time operation out-of-SoLoNOx.
 - According to a memorandum from John S. Seitz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

Fuel Gas Heat Content: 1,000 Btu/scf
 Diesel Fuel Heat Content: 137,000 Btu/gal
 Diesel Engine Heat Rate: 7,000 Btu/hp-hr
 Gas Engine Heat Rate: 8,000 Btu/hp-hr

**Table D-3b. Insignificant Emission Unit Inventory - NO_x Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential NO _x Emissions |
|---------------------------------|--------------------------------|--------------------|-----------------|----------------|--|----------------------------|--|
| <i>Glycol Reboilers</i> | | | | | | | |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 7.67E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 3.29E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 5.48E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 2.19E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 1.10E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 7.67E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 5.48E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 1.10E-01 tpy |
| <i>Glycol Dehydration Vents</i> | | | | | | | |
| 4 | GDU | N/A | N A | 5.53 MMscfd | 8,760 hr/yr | 6,852.05 hr/yr | 0 tpy |
| 5 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,174.30 hr/yr | 0 tpy |
| 6 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,198.35 hr/yr | 0 tpy |
| 7 | GDU | N/A | N A | 0.45 MMscfd | 8,760 hr/yr | 24.00 hr/yr | 0 tpy |
| 8 | GDU | N/A | N A | 0.27 MMscfd | 8,760 hr/yr | 3,556.75 hr/yr | 0 tpy |
| 9 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 6,870.40 hr/yr | 0 tpy |
| 10 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 2,338.65 hr/yr | 0 tpy |
| 13 | GDU | N/A | N A | 3.92 MMscfd | 8,760 hr/yr | 7,114.25 hr/yr | 0 tpy |
| 14 | GDU | N/A | N A | 1.99 MMscfd | 8,760 hr/yr | 6,094.70 hr/yr | 0 tpy |
| 15 | GDU | N/A | N A | 3.87 MMscfd | 8,760 hr/yr | 7,158.45 hr/yr | 0 tpy |
| 16 | GDU | N/A | N A | 6.71 MMscfd | 8,760 hr/yr | 7,155.90 hr/yr | 0 tpy |
| 17 | GDU | N/A | N A | 2.10 MMscfd | 8,760 hr/yr | 5,620.70 hr/yr | 0 tpy |
| 18 | GDU | N/A | N A | 3.05 MMscfd | 8,760 hr/yr | 7,047.25 hr/yr | 0 tpy |
| 21 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 6,752.25 hr/yr | 0 tpy |
| 22 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 2,857.30 hr/yr | 0 tpy |
| 23 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 7,024.90 hr/yr | 0 tpy |
| 24 | GDU | N/A | N A | 3.53 MMscfd | 8,760 hr/yr | 6,735.80 hr/yr | 0 tpy |
| <i>Insignificant Heaters</i> | | | | | | | |
| 11 | Process Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.4 tpy |
| 20 | Process Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.4 tpy |
| 25 | Process Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.1 tpy |
| 29 | Office Coleman Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.06 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.63E-02 tpy |
| 30 | Shop Perfection Schwank Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.02 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 8.76E-03 tpy |
| 31 | Electrical Shop Modine Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.03 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.31E-02 tpy |
| 32 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.11 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.82E-02 tpy |
| 33 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.3 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.1 tpy |
| 34 | BRWD Heater | AP-42 Table 1.4-1 | 100 lb/MMscf | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.2 tpy |
| 35 | Mechanics Shop Used Oil Heater | AP-42 Table 1.11-2 | 11 lb/kgal | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.176 tpy |
| 36 | Portable Frost Fighter | AP-42 Table 1.3-1 | 20 lb/kgal | 0.4 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.256 tpy |
| Totals | | | | | | | 3.5 tpy |

Notes:

¹ Hours of operation are not limited for insignificant units. Therefore limited and unlimited potential hours of operation are estimated as the highest number of hours possible in a year.

² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| Gas Engine Heat Rate | 8,000 Btu/hp-hr |

Table D-4a. Significant Emission Unit Inventory - CO Emissions
Hicorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|------------------------------------|--------------------|------------------|--------------------|----------------------------------|--|--------------------------------|----------------------|---------------------|-----------------|
| | | | | | | | | CO Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | |
| 1 | Turbine Compressor- Out of Solonox | Source Test | 3.2 lb/MMBtu | 7,700 hp | 400 hr/yr | 8,760 hr/yr ⁴ | 0.0 hr/yr | 39.4 tpy | 863.4 tpy | 0 tpy |
| 1 | Turbine Compressor- In Solonox | Source Test | 1.33 lb/hr | 7,700 hp | 8,360 hr/yr | 8,760 hr/yr | 6,157.4 hr/yr | 5.8 tpy | | 4.1 tpy |
| 2 | Compressor | Source Test | 0.49 lb/hr | 530 hp | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 99.8 hr/yr | 2,45E-02 tpy | 0.1 tpy | 2,45E-02 tpy |
| 3 | Generator | Vendor Data | 3.5 g/kW-hr | 420 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 61.6 hr/yr | 0.2 tpy | 0.8 tpy | 0.1 tpy |
| 12 | Generator | AP-42 Table 3.3-1 | 0.00668 lb/hp-hr | 350 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 48.6 hr/yr | 0.2 tpy | 0.8 tpy | 0.1 tpy |
| 19 | Generator | AP-42 Table 3.3-1 | 0.00668 lb/hp-hr | 50 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 37.1 hr/yr | 0.0 tpy | 0.1 tpy | 8.30E-03 tpy |
| 37-1 | Wellsite Compressor | Source Test | 0.35 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204.1 hr/yr | 2.8 tpy | 2.8 tpy | 2.3 tpy |
| 37-2 | Wellsite Compressor | Source Test | 0.68 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,261.5 hr/yr | 4.9 tpy | 4.9 tpy | 4.1 tpy |
| 37-3 | Wellsite Compressor | Source Test | 0.12 g/hp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,191.7 hr/yr | 0.5 tpy | 0.5 tpy | 0.4 tpy |
| 37-4 | Wellsite Compressor | Source Test | 0.77 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,265.7 hr/yr | 6.2 tpy | 6.2 tpy | 4.5 tpy |
| 37-6 | Wellsite Compressor | Source Test | 0.35 g/hp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135.4 hr/yr | 1.4 tpy | 1.4 tpy | 1.1 tpy |
| 37-7 | Wellsite Compressor | Source Test | 0.97 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159.1 hr/yr | 7.9 tpy | 7.9 tpy | 6.4 tpy |
| 37-8 | Wellsite Compressor | Source Test | 0.92 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,217.8 hr/yr | 6.6 tpy | 6.6 tpy | 5.4 tpy |
| 37-9 | Wellsite Compressor | Source Test | 0.96 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230.4 hr/yr | 6.9 tpy | 6.9 tpy | 5.7 tpy |
| 37-10 | Wellsite Compressor | Source Test | 1.6 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,154.7 hr/yr | 13.0 tpy | 13.0 tpy | 10.6 tpy |
| 42 | Generator | Vendor Data | 0.47 lb/hr | 230 kW | 100 hr/yr ⁵ | 500 hr/yr ⁶ | 24.1 hr/yr | 2,35E-02 tpy | 0.1 tpy | 5,65E-03 tpy |
| 43 | Wellsite Compressor | Source Test | 0.36 lb/hr | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,955.6 hr/yr | 1.6 tpy | 1.6 tpy | 0.9 tpy |
| <i>Incinerator</i> | | | | | | | | | | |
| 26 | Incinerator | AP-42 Table 2.1-12 | 10 lb/ton | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54.3 hr/yr | 3.3 tpy | 3.3 tpy | 0.02 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | |
| 44 | GDF | N/A | N/A | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 0 tpy | 0 tpy | 0 tpy |
| Totals | | | | | | | | 97.1 tpy | 917.0 tpy | 45.7 tpy |

Notes:

- ¹ Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
- ² Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
- ³ Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
- ⁴ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
- ⁵ EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
- ⁶ Unlimited potential emissions for the SoLoNox turbine is calculated as full-time operation out-of-SoLoNox.
- ⁷ According to a memorandum from John S. Seitz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate: | 8,000 Btu/hp-hr |

**Table D-4b. Insignificant Emission Unit Inventory - CO Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential CO Emissions |
|---------------------------------|--------------------------------|--------------------|-----------------|----------------|--|----------------------------|---|
| <i>Glycol Reboilers</i> | | | | | | | |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 6.44E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 2.76E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 4.60E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 1.84E-01 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 9.20E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 6.44E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 4.60E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 9.20E-02 tpy |
| <i>Glycol Dehydration Vents</i> | | | | | | | |
| 4 | GDU | N/A | N A | 5.53 MMscfd | 8,760 hr/yr | 6,852.05 hr/yr | 0 tpy |
| 5 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,174.30 hr/yr | 0 tpy |
| 6 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,198.35 hr/yr | 0 tpy |
| 7 | GDU | N/A | N A | 0.45 MMscfd | 8,760 hr/yr | 24.00 hr/yr | 0 tpy |
| 8 | GDU | N/A | N A | 0.27 MMscfd | 8,760 hr/yr | 3,556.75 hr/yr | 0 tpy |
| 9 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 6,870.40 hr/yr | 0 tpy |
| 10 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 2,338.65 hr/yr | 0 tpy |
| 13 | GDU | N/A | N A | 3.92 MMscfd | 8,760 hr/yr | 7,114.25 hr/yr | 0 tpy |
| 14 | GDU | N/A | N A | 1.99 MMscfd | 8,760 hr/yr | 6,094.70 hr/yr | 0 tpy |
| 15 | GDU | N/A | N A | 3.87 MMscfd | 8,760 hr/yr | 7,158.45 hr/yr | 0 tpy |
| 16 | GDU | N/A | N A | 6.71 MMscfd | 8,760 hr/yr | 7,155.90 hr/yr | 0 tpy |
| 17 | GDU | N/A | N A | 2.10 MMscfd | 8,760 hr/yr | 5,620.70 hr/yr | 0 tpy |
| 18 | GDU | N/A | N A | 3.05 MMscfd | 8,760 hr/yr | 7,047.25 hr/yr | 0 tpy |
| 21 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 6,752.25 hr/yr | 0 tpy |
| 22 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 2,857.30 hr/yr | 0 tpy |
| 23 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 7,024.90 hr/yr | 0 tpy |
| 24 | GDU | N/A | N A | 3.53 MMscfd | 8,760 hr/yr | 6,735.80 hr/yr | 0 tpy |
| <i>Insignificant Heaters</i> | | | | | | | |
| 11 | Process Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.4 tpy |
| 20 | Process Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.4 tpy |
| 25 | Process Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.60E-02 tpy |
| 29 | Office Coleman Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.06 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.21E-02 tpy |
| 30 | Shop Perfection Schwank Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.02 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 7.36E-03 tpy |
| 31 | Electrical Shop Modine Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.03 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.10E-02 tpy |
| 32 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.11 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.05E-02 tpy |
| 33 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.3 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.1 tpy |
| 34 | BRWD Heater | AP-42 Table 1.4-1 | 84 lb/MMscf | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 0.2 tpy |
| 35 | Mechanics Shop Used Oil Heater | AP-42 Table 1.11-2 | 1.7 lb/kgal | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.72E-02 tpy |
| 36 | Portable Frost Fighter | AP-42 Table 1.3-1 | 5 lb/kgal | 0.4 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 6.39E-02 tpy |
| Totals | | | | | | | 2.7 tpy |

Notes:

¹ Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate: | 8,000 Btu/hp-hr |

Table D-5a. Significant Emission Unit Inventory - PM Emissions
Hicorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|----------------------------|--------------------|------------------|--------------------|----------------------------------|--|--------------------------------|----------------------|---------------------|----------------|
| | | | | | | | | PM Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | |
| 1 | Turbine Compressor - Total | AP-42 Table 3.1-2a | 0.0066 lb/MMBtu | 7,700 hp | 8,760 hr/yr | 8,760 hr/yr | 6,157 hr/yr | 1.8 tpy | 1.8 tpy | 1.3 tpy |
| 2 | Compressor | AP-42 Table 3.2-2 | 7.7E-05 lb/MMBtu | 530 hp | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 99.8 hr/yr | 1.63E-05 tpy | 8.16E-05 tpy | 1.63E-05 tpy |
| 3 | Generator | Vendor Data | 3.5 g/kW-hr | 420 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 62 hr/yr | 0.2 tpy | 0.8 tpy | 0.1 tpy |
| 12 | Generator | AP-42 Table 3.3-1 | 0.0022 lb/hp-hr | 350 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 49 hr/yr | 0.1 tpy | 0.3 tpy | 2.51E-02 tpy |
| 19 | Generator | AP-42 Table 3.3-1 | 0.0022 lb/hp-hr | 50 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 37 hr/yr | 7.38E-03 tpy | 3.69E-02 tpy | 2.73E-03 tpy |
| 37-1 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204 hr/yr | 0.3 tpy | 0.3 tpy | 0.2 tpy |
| 37-2 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,262 hr/yr | 0.2 tpy | 0.2 tpy | 0.2 tpy |
| 37-3 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,192 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-4 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,266 hr/yr | 0.3 tpy | 0.3 tpy | 0.2 tpy |
| 37-6 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-7 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159 hr/yr | 0.3 tpy | 0.3 tpy | 0.2 tpy |
| 37-8 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,218 hr/yr | 0.2 tpy | 0.2 tpy | 0.2 tpy |
| 37-9 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230 hr/yr | 0.2 tpy | 0.2 tpy | 0.2 tpy |
| 37-10 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,155 hr/yr | 0.3 tpy | 0.3 tpy | 0.2 tpy |
| 42 | Generator | Vendor Data | 0.09 lb/hr | 230 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 24 hr/yr | 4.50E-03 tpy | 2.25E-02 tpy | 1.08E-03 tpy |
| 43 | Wellsite Compressor | AP-42 Table 3.2-3 | 0.0095 lb/MMBtu | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,956 hr/yr | 0.1 tpy | 0.1 tpy | 4.14E-02 tpy |
| <i>Incinerator</i> | | | | | | | | | | |
| 26 | Incinerator | AP-42 Table 2.1-12 | 7 lb/ton | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54 hr/yr | 2.3 tpy | 2.3 tpy | 0.01 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | |
| 44 | GDF | N/A | N/A | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 0 tpy | 0 tpy | 0 tpy |
| Totals | | | | | | | | 6.5 tpy | 5.1 tpy | 3.1 tpy |

Notes:

- ¹ Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
- ² Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
- ³ Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
- ⁴ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
- ⁵ EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
- ⁶ According to a memorandum from John S. Setz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate | 8,000 Btu/hp-hr |

**Table D-5b. Insignificant Emission Unit Inventory - PM Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential PM Emissions |
|---------------------------------|--------------------------------|--------------------|-----------------|----------------|--|----------------------------|---|
| <i>Glycol Reboilers</i> | | | | | | | |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 5.83E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 2.50E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 4.16E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 1.66E-02 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 8.32E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 5.83E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 4.16E-03 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 8.32E-03 tpy |
| <i>Glycol Dehydration Vents</i> | | | | | | | |
| 4 | GDU | N/A | N/A | 5.53 MMscfd | 8,760 hr/yr | 6,852.05 hr/yr | 0 tpy |
| 5 | GDU | N/A | N/A | 55.00 MMscfd | 8,760 hr/yr | 6,174.30 hr/yr | 0 tpy |
| 6 | GDU | N/A | N/A | 55.00 MMscfd | 8,760 hr/yr | 6,198.35 hr/yr | 0 tpy |
| 7 | GDU | N/A | N/A | 0.45 MMscfd | 8,760 hr/yr | 24.00 hr/yr | 0 tpy |
| 8 | GDU | N/A | N/A | 0.27 MMscfd | 8,760 hr/yr | 3,556.75 hr/yr | 0 tpy |
| 9 | GDU | N/A | N/A | 5.14 MMscfd | 8,760 hr/yr | 6,870.40 hr/yr | 0 tpy |
| 10 | GDU | N/A | N/A | 5.14 MMscfd | 8,760 hr/yr | 2,338.65 hr/yr | 0 tpy |
| 13 | GDU | N/A | N/A | 3.92 MMscfd | 8,760 hr/yr | 7,114.25 hr/yr | 0 tpy |
| 14 | GDU | N/A | N/A | 1.99 MMscfd | 8,760 hr/yr | 6,094.70 hr/yr | 0 tpy |
| 15 | GDU | N/A | N/A | 3.87 MMscfd | 8,760 hr/yr | 7,158.45 hr/yr | 0 tpy |
| 16 | GDU | N/A | N/A | 6.71 MMscfd | 8,760 hr/yr | 7,155.90 hr/yr | 0 tpy |
| 17 | GDU | N/A | N/A | 2.10 MMscfd | 8,760 hr/yr | 5,620.70 hr/yr | 0 tpy |
| 18 | GDU | N/A | N/A | 3.05 MMscfd | 8,760 hr/yr | 7,047.25 hr/yr | 0 tpy |
| 21 | GDU | N/A | N/A | 2.37 MMscfd | 8,760 hr/yr | 6,752.25 hr/yr | 0 tpy |
| 22 | GDU | N/A | N/A | 2.37 MMscfd | 8,760 hr/yr | 2,857.30 hr/yr | 0 tpy |
| 23 | GDU | N/A | N/A | 2.37 MMscfd | 8,760 hr/yr | 7,024.90 hr/yr | 0 tpy |
| 24 | GDU | N/A | N/A | 3.53 MMscfd | 8,760 hr/yr | 6,735.80 hr/yr | 0 tpy |
| <i>Insignificant Heaters</i> | | | | | | | |
| 11 | Process Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.33E-02 tpy |
| 20 | Process Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.33E-02 tpy |
| 25 | Process Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.16E-03 tpy |
| 29 | Office Coleman Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.06 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.00E-03 tpy |
| 30 | Shop Perfection Schwank Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.02 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 6.66E-04 tpy |
| 31 | Electrical Shop Modine Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.03 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 9.99E-04 tpy |
| 32 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.11 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.66E-03 tpy |
| 33 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.3 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 9.99E-03 tpy |
| 34 | BRWD Heater | AP-42 Table 1.4-1 | 7.6 lb/MMscf | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.66E-02 tpy |
| 35 | Mechanics Shop Used Oil Heater | AP-42 Table 1.11-1 | 14 lb/kgal | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.24E-01 tpy |
| 36 | Portable Frost Fighter | AP-42 Table 1.3-1 | 3.3 lb/kgal | 0.4 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.22E-02 tpy |
| Totals | | | | | | | 0.5 tpy |

Notes:

¹ Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate | 8,000 Btu/hp-hr |

Table D-6a. Significant Emission Unit Inventory - VOC Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|----------------------------|--------------------|------------------|--------------------|----------------------------------|--|--------------------------------|----------------------|---------------------|----------------|
| | | | | | | | | VOC Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | |
| 1 | Turbine Compressor - Total | AP-42 Table 3.1-2a | 0.0021 lb/MMBtu | 7,700 hp | 8,760 hr/yr | 8,760 hr/yr | 6,157 hr/yr | 0.567 tpy | 12.41 tpy | 0.4 tpy |
| 2 | Compressor | AP-42 Table 3.2-2 | 0.118 lb/MMBtu | 530 hp | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 99.8 hr/yr | 0.025 tpy | 0.13 tpy | 2.50E-02 tpy |
| 3 | Generator | Vendor Data | 3.5 g/kW-hr | 420 kW | 100 hr/yr ⁵ | 500 hr/yr ⁵ | 62 hr/yr | 0.2 tpy | 14.2 tpy | 0.1 tpy |
| 12 | Generator | AP-42 Table 3.3-1 | 0.00247 lb/hp-hr | 350 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 49 hr/yr | 0.1 tpy | 5.1 tpy | 2.81E-02 tpy |
| 19 | Generator | AP-42 Table 3.3-1 | 0.00247 lb/hp-hr | 50 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 37 hr/yr | 8.28E-03 tpy | 0.7 tpy | 3.07E-03 tpy |
| 37-1 | Wellsite Compressor | Source Test | 0.01 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-2 | Wellsite Compressor | Source Test | 0.01 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,262 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-3 | Wellsite Compressor | Source Test | 0.007 g/hp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,192 hr/yr | 0.03 tpy | 0.03 tpy | 0.02 tpy |
| 37-4 | Wellsite Compressor | Source Test | 0.03 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,256 hr/yr | 0.2 tpy | 0.2 tpy | 0.2 tpy |
| 37-6 | Wellsite Compressor | Source Test | 0.00 g/hp-hr | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135 hr/yr | 0 tpy | 0 tpy | 0 tpy |
| 37-7 | Wellsite Compressor | Source Test | 0.02 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159 hr/yr | 0.2 tpy | 0.2 tpy | 0.1 tpy |
| 37-8 | Wellsite Compressor | Source Test | 0.02 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,218 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-9 | Wellsite Compressor | Source Test | 0.02 g/hp-hr | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230 hr/yr | 0.1 tpy | 0.1 tpy | 0.1 tpy |
| 37-10 | Wellsite Compressor | Source Test | 0.03 g/hp-hr | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,155 hr/yr | 0.2 tpy | 0.2 tpy | 0.2 tpy |
| 42 | Generator | Vendor Data | 0.13 lb/hr | 230 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 24 hr/yr | 0.0 tpy | 0.6 tpy | 1.56E-03 tpy |
| 43 | Wellsite Compressor | Source Test | 0.03 g/hp-hr | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,956 hr/yr | 0.1 tpy | 0.1 tpy | 3.61E-02 tpy |
| <i>Incinerator</i> | | | | | | | | | | |
| 26 | Incinerator | AP-42 Table 2.1-12 | 3 lb/ton | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54 hr/yr | 0.99 tpy | 0.99 tpy | 0.01 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | |
| 44 | GDF | AP-42 Table 5.2-7 | 24.2 lb/kgal | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 1.45 tpy | 1.45 tpy | 1.45 tpy |
| Totals | | | | | | | | 4.4 tpy | 36.7 tpy | 2.9 tpy |

Notes:

- ¹ Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
- ² Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
- ³ Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
- ⁴ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
- ⁵ EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
- ⁶ According to a memorandum from John S. Seitz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate | 8,000 Btu/hp-hr |

Table D-6b. Insignificant Emission Unit Inventory - VOC Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential VOC Emissions |
|--------------------------------|--------------------------------|--------------------|-----------------|----------------|--|----------------------------|--|
| <i>Glycol Reboilers</i> | | | | | | | |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 3.08E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 1.32E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 2.20E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 8.79E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 4.40E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 3.08E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 2.20E-05 tpy |
| N/A | Reboiler | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 4.40E-05 tpy |
| <i>Glycol Dehydrator Vents</i> | | | | | | | |
| 4 | GDU | GRI GlyCalc | | 5.53 MMscfd | 8,760 hr/yr | 6,852.05 hr/yr | 2.33E-01 tpy |
| 5 | GDU | GRI GlyCalc | | 55.00 MMscfd | 8,760 hr/yr | 6,174.30 hr/yr | 0 tpy |
| 6 | GDU | GRI GlyCalc | | 55.00 MMscfd | 8,760 hr/yr | 6,198.35 hr/yr | 1.08E-02 tpy |
| 7 | GDU | GRI GlyCalc | | 0.45 MMscfd | 8,760 hr/yr | 24.00 hr/yr | 1.70E-01 tpy |
| 8 | GDU | GRI GlyCalc | | 0.27 MMscfd | 8,760 hr/yr | 3,556.75 hr/yr | 8.00E-04 tpy |
| 9 | GDU | GRI GlyCalc | | 5.14 MMscfd | 8,760 hr/yr | 6,870.40 hr/yr | 1.31E-01 tpy |
| 10 | GDU | GRI GlyCalc | | 5.14 MMscfd | 8,760 hr/yr | 2,338.65 hr/yr | 0 tpy |
| 13 | GDU | GRI GlyCalc | | 3.92 MMscfd | 8,760 hr/yr | 7,114.25 hr/yr | 2.60E-03 tpy |
| 14 | GDU | GRI GlyCalc | | 1.99 MMscfd | 8,760 hr/yr | 6,094.70 hr/yr | 1.50E-01 tpy |
| 15 | GDU | GRI GlyCalc | | 3.87 MMscfd | 8,760 hr/yr | 7,158.45 hr/yr | 7.23E-02 tpy |
| 16 | GDU | GRI GlyCalc | | 6.71 MMscfd | 8,760 hr/yr | 7,155.90 hr/yr | 8.00E-04 tpy |
| 17 | GDU | GRI GlyCalc | | 2.10 MMscfd | 8,760 hr/yr | 5,620.70 hr/yr | 3.87E-01 tpy |
| 18 | GDU | GRI GlyCalc | | 3.05 MMscfd | 8,760 hr/yr | 7,047.25 hr/yr | 2.76E-01 tpy |
| 21 | GDU | GRI GlyCalc | | 2.37 MMscfd | 8,760 hr/yr | 6,752.25 hr/yr | 2.36E-01 tpy |
| 22 | GDU | GRI GlyCalc | | 2.37 MMscfd | 8,760 hr/yr | 2,857.30 hr/yr | 2.35E-01 tpy |
| 23 | GDU | GRI GlyCalc | | 2.37 MMscfd | 8,760 hr/yr | 7,024.90 hr/yr | 2.70E-03 tpy |
| 24 | GDU | GRI GlyCalc | | 3.53 MMscfd | 8,760 hr/yr | 6,735.80 hr/yr | 1.96E-01 tpy |
| <i>Insignificant Heaters</i> | | | | | | | |
| 11 | Process Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 1.000 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.41E-02 tpy |
| 20 | Process Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 1.000 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.41E-02 tpy |
| 25 | Process Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.01E-03 tpy |
| 29 | Office Coleman Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.060 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.45E-03 tpy |
| 30 | Shop Perfection Schwank Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.020 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.82E-04 tpy |
| 31 | Electrical Shop Modine Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.030 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 7.23E-04 tpy |
| 32 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.110 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.65E-03 tpy |
| 33 | Mechanics Shop Modine Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.300 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 7.23E-03 tpy |
| 34 | BRWD Heater | AP-42 Table 1.4-1 | 5.5 lb/MMscf | 0.500 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.20E-02 tpy |
| 35 | Mechanics Shop Used Oil Heater | AP-42 Table 1.11-3 | 1.0 lb/kgal | 0.500 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.60E-02 tpy |
| 36 | Portable Frost Fighter | AP-42 Table 1.3-1 | 0.7 lb/kgal | 0.400 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 8.95E-03 tpy |
| Totals | | | | | | | 2.2 tpy |

Notes:

¹ Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:

| | |
|---------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| NG Engine Heat Rate | 8,000 Btu/hp-hr |

Table D-7a. Significant Emission Unit Inventory - SO₂ Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|----------------------------|---------------------|---------------------------|--------------------|----------------------------------|--|--------------------------------|---------------------------|---------------------|----------------|
| | | | | | | | | SO ₂ Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | |
| 1 | Turbine Compressor - Total | Mass Balance | 25 ppmvd H ₂ S | 7,700 hp | 8,760 hr/yr | 8,760 hr/yr | 6,157 hr/yr | 1.1 tpy | 1.1 tpy | 0.80 tpy |
| 2 | Compressor | Mass Balance | 25 ppmvd H ₂ S | 530 hp | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 100 hr/yr | 8.93E-04 tpy | 8.93E-04 tpy | 8.91E-04 tpy |
| 3 | Generator | Mass Balance | 0.0015 wt.%S | 420 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 62 hr/yr | 3.02E-02 tpy | 2.6 tpy | 0.02 tpy |
| 12 | Generator | Mass Balance | 0.0015 wt.%S | 350 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 49 hr/yr | 2.52E-02 tpy | 2.2 tpy | 0.01 tpy |
| 19 | Generator | Mass Balance | 0.0015 wt.%S | 50 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 37 hr/yr | 3.60E-03 tpy | 0.3 tpy | 0.00 tpy |
| 37-1 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204 hr/yr | 0.1 tpy | 0.1 tpy | 0.10 tpy |
| 37-2 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,262 hr/yr | 0.1 tpy | 0.1 tpy | 0.09 tpy |
| 37-3 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,192 hr/yr | 0.1 tpy | 0.1 tpy | 0.05 tpy |
| 37-4 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,266 hr/yr | 0.1 tpy | 0.1 tpy | 0.09 tpy |
| 37-6 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135 hr/yr | 0.1 tpy | 0.1 tpy | 0.05 tpy |
| 37-7 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159 hr/yr | 0.1 tpy | 0.1 tpy | 0.10 tpy |
| 37-8 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,218 hr/yr | 0.1 tpy | 0.1 tpy | 0.09 tpy |
| 37-9 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230 hr/yr | 0.1 tpy | 0.1 tpy | 0.09 tpy |
| 37-10 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,155 hr/yr | 0.1 tpy | 0.1 tpy | 0.10 tpy |
| 42 | Generator | Mass Balance | 0.0015 wt.%S | 230 kW | 100 hr/yr ⁴ | 500 hr/yr ⁵ | 24 hr/yr | 1.66E-02 tpy | 1.5 tpy | 3.98E-03 tpy |
| 43 | Wellsite Compressor | Mass Balance | 25 ppmvd H ₂ S | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,956 hr/yr | 3.25E-02 tpy | 3.25E-02 tpy | 0.02 tpy |
| <i>Incinerator</i> | | | | | | | | | | |
| 26 | Incinerator | AP-42, Table 2.1-12 | 2.5 lb/ton | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54 hr/yr | 0.82 tpy | 0.82 tpy | 0.01 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | |
| 44 | GDF | N/A | N/A | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 0 tpy | 0 tpy | 0 tpy |
| Totals | | | | | | | | 3.0 tpy | 9.6 tpy | 1.6 tpy |

Notes:

- ¹ Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
- ² Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
- ³ Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
- ⁴ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
- ⁵ EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
- ⁶ According to a memorandum from John S. Seitz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

| | |
|-------------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| Natural Gas Engine Heat Rate: | 8,000 Btu/hp-hr |

Table D-7b. Insignificant Emission Unit Inventory - SO₂ Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Reference | Emission Factor | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential SO ₂ Emissions |
|--------------------------------|--------------------------------|--------------|---------------------------|----------------|--|----------------------------|--|
| <i>Glycol Reboilers</i> | | | | | | | |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 1.37E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 5.87E-02 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 9.79E-02 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 3.92E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 1.96E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 1.37E-01 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 9.79E-02 tpy |
| N/A | Reboiler | Mass Balance | 25 ppmvd H ₂ S | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 1.96E-01 tpy |
| <i>Glycol Dehydrator Vents</i> | | | | | | | |
| 4 | GDU | N/A | N A | 5.53 MMscfd | 8,760 hr/yr | 6,852.05 hr/yr | 0.00 tpy |
| 5 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,174.30 hr/yr | 0.00 tpy |
| 6 | GDU | N/A | N A | 55.00 MMscfd | 8,760 hr/yr | 6,198.35 hr/yr | 0.00 tpy |
| 7 | GDU | N/A | N A | 0.45 MMscfd | 8,760 hr/yr | 24.00 hr/yr | 0.00 tpy |
| 8 | GDU | N/A | N A | 0.27 MMscfd | 8,760 hr/yr | 3,556.75 hr/yr | 0.00 tpy |
| 9 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 6,870.40 hr/yr | 0.00 tpy |
| 10 | GDU | N/A | N A | 5.14 MMscfd | 8,760 hr/yr | 2,338.65 hr/yr | 0.00 tpy |
| 13 | GDU | N/A | N A | 3.92 MMscfd | 8,760 hr/yr | 7,114.25 hr/yr | 0.00 tpy |
| 14 | GDU | N/A | N A | 1.99 MMscfd | 8,760 hr/yr | 6,094.70 hr/yr | 0.00 tpy |
| 15 | GDU | N/A | N A | 3.87 MMscfd | 8,760 hr/yr | 7,158.45 hr/yr | 0.00 tpy |
| 16 | GDU | N/A | N A | 6.71 MMscfd | 8,760 hr/yr | 7,155.90 hr/yr | 0.00 tpy |
| 17 | GDU | N/A | N A | 2.10 MMscfd | 8,760 hr/yr | 5,620.70 hr/yr | 0.00 tpy |
| 18 | GDU | N/A | N A | 3.05 MMscfd | 8,760 hr/yr | 7,047.25 hr/yr | 0.00 tpy |
| 21 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 6,752.25 hr/yr | 0.00 tpy |
| 22 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 2,857.30 hr/yr | 0.00 tpy |
| 23 | GDU | N/A | N A | 2.37 MMscfd | 8,760 hr/yr | 7,024.90 hr/yr | 0.00 tpy |
| 24 | GDU | N/A | N A | 3.53 MMscfd | 8,760 hr/yr | 6,735.80 hr/yr | 0.00 tpy |
| <i>Insignificant Heaters</i> | | | | | | | |
| 11 | Process Heater | Mass Balance | 25 ppmvd H ₂ S | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 7.83E-01 tpy |
| 20 | Process Heater | Mass Balance | 25 ppmvd H ₂ S | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 7.83E-01 tpy |
| 25 | Process Heater | Mass Balance | 25 ppmvd H ₂ S | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 9.79E-02 tpy |
| 29 | Office Coleman Heater | Mass Balance | 25 ppmvd H ₂ S | 0.06 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 4.70E-02 tpy |
| 30 | Shop Perfection Schwank Heater | Mass Balance | 25 ppmvd H ₂ S | 0.02 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 1.57E-02 tpy |
| 31 | Electrical Shop Modine Heater | Mass Balance | 25 ppmvd H ₂ S | 0.03 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.35E-02 tpy |
| 32 | Mechanics Shop Modine Heater | Mass Balance | 25 ppmvd H ₂ S | 0.11 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 8.62E-02 tpy |
| 33 | Mechanics Shop Modine Heater | Mass Balance | 25 ppmvd H ₂ S | 0.3 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.35E-01 tpy |
| 34 | BRWD Heater | Mass Balance | 25 ppmvd H ₂ S | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.92E-01 tpy |
| 35 | Mechanics Shop Used Oil Heater | Mass Balance | 0.0015 wt.%S | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 3.15E-03 tpy |
| 36 | Portable Frost Fighter | Mass Balance | 0.0015 wt.%S | 0.4 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr ² | 2.52E-03 tpy |
| Totals | | | | | | | 5.5 tpy |

Notes:

¹ Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:

| | |
|-------------------------------|-----------------|
| Fuel Gas Heat Content: | 1,000 Btu/scf |
| Diesel Fuel Heat Content: | 137,000 Btu/gal |
| Diesel Fuel Density: | 7 lb/gal |
| Diesel Engine Heat Rate: | 7,000 Btu/hp-hr |
| Natural Gas Engine Heat Rate: | 8,000 Btu/hp-hr |

Table D-3a. Significant Emission Unit Inventory - CO₂e Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Rating/Size | Allowable Operation ¹ | Unlimited Potential Operation ² | Estimated Actuals ³ | Assessable Potential | Unlimited Potential | Actual | Assessable Potential | Unlimited Potential | Actual | Assessable Potential | Unlimited Potential | Actual | Assessable Potential | Unlimited Potential | Actual |
|-------------------------------------|----------------------------|--------------------|----------------------------------|--|--------------------------------|---------------------------|---------------------|-------------------|---------------------------|---------------------|--------------------|----------------------------|---------------------|--------------------|-----------------------------|---------------------|-------------------|
| | | | | | | CO ₂ Emissions | | | CH ₄ Emissions | | | N ₂ O Emissions | | | CO ₂ e Emissions | | |
| <i>Turbines and Engines</i> | | | | | | | | | | | | | | | | | |
| 1 | Turbine Compressor - Total | 7,700 hp | 8,760 hr/yr | 8,760 hr/yr | 6,157 hr/yr | 31,561 tpy | 31,561 tpy | 22,184 tpy | 5,95E-01 tpy | 5,95E-01 tpy | 4,19E-01 tpy | 5,95E-02 tpy | 5,95E-02 tpy | 4,19E-02 tpy | 31,594 tpy | 31,594 tpy | 22,207 tpy |
| 2 | Compressor | 530 hp | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 99.8 hr/yr | 25 tpy | 124 tpy | 25 tpy | 4.67E-04 tpy | 2.34E-03 tpy | 4.66E-04 tpy | 4.67E-06 tpy | 4.66E-05 tpy | 2.34E-04 tpy | 25 tpy | 124 tpy | 25 tpy |
| 3 | Generator | 420 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 61.55 hr/yr | 26 tpy | 132 tpy | 16 tpy | 4.97E-04 tpy | 2.48E-03 tpy | 3.06E-04 tpy | 4.97E-06 tpy | 2.48E-04 tpy | 3.06E-05 tpy | 26 tpy | 132 tpy | 16 tpy |
| 12 | Generator | 350 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 48.55 hr/yr | 27 tpy | 134 tpy | 13 tpy | 1.09E-03 tpy | 5.43E-03 tpy | 5.27E-04 tpy | 2.17E-04 tpy | 1.09E-03 tpy | 1.09E-04 tpy | 27 tpy | 134 tpy | 13 tpy |
| 19 | Generator | 50 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 37.05 hr/yr | 4 tpy | 19 tpy | 1 tpy | 1.55E-04 tpy | 7.76E-04 tpy | 5.75E-05 tpy | 3.10E-05 tpy | 1.55E-04 tpy | 1.15E-05 tpy | 4 tpy | 19 tpy | 1 tpy |
| 37-1 | Wellsite Compressor | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,204 hr/yr | 3,443 tpy | 3,443 tpy | 2,831 tpy | 6.49E-02 tpy | 6.49E-02 tpy | 5.34E-02 tpy | 6.49E-03 tpy | 6.49E-03 tpy | 5.34E-03 tpy | 3,447 tpy | 3,447 tpy | 2,834 tpy |
| 37-2 | Wellsite Compressor | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,262 hr/yr | 3,033 tpy | 3,033 tpy | 2,514 tpy | 5.72E-02 tpy | 5.72E-02 tpy | 4.74E-02 tpy | 5.72E-03 tpy | 5.72E-03 tpy | 4.74E-03 tpy | 3,036 tpy | 3,036 tpy | 2,517 tpy |
| 37-3 | Wellsite Compressor | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,192 hr/yr | 1,640 tpy | 1,640 tpy | 1,346 tpy | 3.09E-02 tpy | 3.09E-02 tpy | 2.54E-02 tpy | 3.09E-03 tpy | 3.09E-03 tpy | 2.54E-03 tpy | 1,641 tpy | 1,641 tpy | 1,347 tpy |
| 37-4 | Wellsite Compressor | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 6,266 hr/yr | 3,443 tpy | 3,443 tpy | 2,463 tpy | 6.49E-02 tpy | 6.49E-02 tpy | 4.84E-02 tpy | 6.49E-03 tpy | 6.49E-03 tpy | 4.84E-03 tpy | 3,447 tpy | 3,447 tpy | 2,465 tpy |
| 37-6 | Wellsite Compressor | 400 hp | 8,760 hr/yr | 8,760 hr/yr | 7,135 hr/yr | 1,640 tpy | 1,640 tpy | 1,335 tpy | 3.09E-02 tpy | 3.09E-02 tpy | 2.52E-02 tpy | 3.09E-03 tpy | 3.09E-03 tpy | 2.52E-03 tpy | 1,641 tpy | 1,641 tpy | 1,337 tpy |
| 37-7 | Wellsite Compressor | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,159 hr/yr | 3,443 tpy | 3,443 tpy | 2,814 tpy | 6.49E-02 tpy | 6.49E-02 tpy | 5.30E-02 tpy | 6.49E-03 tpy | 6.49E-03 tpy | 5.30E-03 tpy | 3,447 tpy | 3,447 tpy | 2,817 tpy |
| 37-8 | Wellsite Compressor | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,216 hr/yr | 3,033 tpy | 3,033 tpy | 2,499 tpy | 5.72E-02 tpy | 5.72E-02 tpy | 4.71E-02 tpy | 5.72E-03 tpy | 5.72E-03 tpy | 4.71E-03 tpy | 3,036 tpy | 3,036 tpy | 2,502 tpy |
| 37-9 | Wellsite Compressor | 740 hp | 8,760 hr/yr | 8,760 hr/yr | 7,230 hr/yr | 3,033 tpy | 3,033 tpy | 2,594 tpy | 5.72E-02 tpy | 5.72E-02 tpy | 4.72E-02 tpy | 5.72E-03 tpy | 5.72E-03 tpy | 4.72E-03 tpy | 3,036 tpy | 3,036 tpy | 2,506 tpy |
| 37-10 | Wellsite Compressor | 840 hp | 8,760 hr/yr | 8,760 hr/yr | 7,155 hr/yr | 3,443 tpy | 3,443 tpy | 2,812 tpy | 6.49E-02 tpy | 6.49E-02 tpy | 5.30E-02 tpy | 6.49E-03 tpy | 6.49E-03 tpy | 5.30E-03 tpy | 3,447 tpy | 3,447 tpy | 2,815 tpy |
| 42 | Generator | 230 kW | 100 hr/yr ⁴ | 500 hr/yr ⁴ | 24 hr/yr | 14 tpy | 72 tpy | 3 tpy | 2.72E-04 tpy | 1.36E-03 tpy | 6.54E-05 tpy | 2.72E-06 tpy | 1.36E-04 tpy | 6.54E-06 tpy | 14 tpy | 72 tpy | 3 tpy |
| 43 | Wellsite Compressor | 220 hp | 8,760 hr/yr | 8,760 hr/yr | 4,956 hr/yr | 902 tpy | 902 tpy | 510 tpy | 1.70E-02 tpy | 1.70E-02 tpy | 9.61E-03 tpy | 1.70E-03 tpy | 1.70E-03 tpy | 9.61E-04 tpy | 903 tpy | 903 tpy | 511 tpy |
| <i>Incinerator</i> | | | | | | | | | | | | | | | | | |
| 26 | Incinerator | 150 lb/hr | 8,760 hr/yr | 8,760 hr/yr | 54.3 hr/yr | 654 tpy | 654 tpy | 4.1 tpy | 2.31E-01 tpy | 2.31E-01 tpy | 1.43E-03 tpy | 3.03E-02 tpy | 3.03E-02 tpy | 1.88E-04 tpy | 668 tpy | 668 tpy | 4 tpy |
| <i>Gasoline Dispensing Facility</i> | | | | | | | | | | | | | | | | | |
| 44 | GDF | <10,000 gallons/mo | 8,760 hr/yr | 8,760 hr/yr | 8,760 hr/yr | 0 tpy | 0 tpy | 0.0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy | 0 tpy |
| Totals | | | | | | 59,363 tpy | 59,748 tpy | 43,876 tpy | 1.3E+00 tpy | 1.3E+00 tpy | 8.3E-01 tpy | 1.4E-01 tpy | 1.4E-01 tpy | 8.3E-02 tpy | 59,439 tpy | 59,824 tpy | 43,921 tpy |

- Notes:
- ¹ Allowable operation is based on full-time operation, or permit operating limits, where applicable. This value is used to calculate Assessable Potential Emissions.
 - ² Maximum annual operation for all units based on full-time annual operation is used to calculate unlimited potential emissions.
 - ³ Estimated actual hours of operation are an average of actual hours of operation from 2015-2017.
 - ⁴ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.
 - ⁵ EU IDs 2, 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.
 - ⁶ According to a memorandum from John S. Seitz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Conversions:

Fuel Gas Heat Content: 1,000 Btu/scf
 Diesel Fuel Heat Content: 137,000 Btu/gal
 Diesel Fuel Density: 7 lb/gal
 Diesel Engine Heat Rate: 7,000 Btu/hp-hr
 NG Engine Heat Rate: 8,000 Btu/hp-hr
 Municipal Solid Waste HHV: 9.95 MMBtu/short ton

| GHG Emission Factors (kg/MMBtu) | Fuel Gas | Diesel | MSW | GWP |
|---------------------------------|----------|----------|----------|-----|
| CO ₂ | 53.06 | 73.96 | 90.7 | 1 |
| CH ₄ | 1.00E-03 | 3.00E-03 | 3.20E-02 | 25 |
| N ₂ O | 1.00E-04 | 6.00E-04 | 4.20E-03 | 298 |

Table D-8b. Insignificant Emission Unit Inventory - CO₂e Emissions
Hilcorp Alaska, LLC - Beluga River Unit

| EU ID | Emission Unit Name | Rating/Size | Allowable and Unlimited Potential Operation ¹ | Estimated Actual Operation | Assessable and Unlimited Potential | Assessable and Unlimited Potential | Assessable and Unlimited Potential | Assessable and Unlimited Potential |
|--------------------------------|----------------------------------|----------------|--|----------------------------|------------------------------------|------------------------------------|------------------------------------|------------------------------------|
| | | | | | CO ₂ Emissions | CH ₄ Emissions | N ₂ O Emissions | CO ₂ e Emissions |
| <i>Glycol Reboilers</i> | | | | | | | | |
| N/A | Pad H Glycol Reboiler #1 | 0.25 MMBtu/hr | 8,760 hr/yr | 6,852.05 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad H Glycol Reboiler #2 | 0.25 MMBtu/hr | 8,760 hr/yr | 6,174.30 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad H Glycol Reboiler #3 | 0.18 MMBtu/hr | 8,760 hr/yr | 6,198.35 hr/yr | 8.97E+01 tpy | 1.69E-03 tpy | 1.69E-04 tpy | 8.98E+01 tpy |
| N/A | Pad A Glycol Reboiler | 0.08 MMBtu/hr | 8,760 hr/yr | 24.00 hr/yr | 3.84E+01 tpy | 7.24E-04 tpy | 7.24E-05 tpy | 3.85E+01 tpy |
| N/A | Pad B Glycol Reboiler | 0.25 MMBtu/hr | 8,760 hr/yr | 3,556.75 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad C Glycol Reboiler #1 | 0.25 MMBtu/hr | 8,760 hr/yr | 6,870.40 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad C Glycol Reboiler #2 | 0.25 MMBtu/hr | 8,760 hr/yr | 2,338.65 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad D Glycol Reboiler | 0.25 MMBtu/hr | 8,760 hr/yr | 7,114.25 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad E Glycol Reboiler #1 | 0.25 MMBtu/hr | 8,760 hr/yr | 6,094.70 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad E Glycol Reboiler #2 | 0.13 MMBtu/hr | 8,760 hr/yr | 7,158.45 hr/yr | 6.40E+01 tpy | 1.21E-03 tpy | 1.21E-04 tpy | 6.41E+01 tpy |
| N/A | Pad F Glycol Reboiler | 0.25 MMBtu/hr | 8,760 hr/yr | 7,155.90 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad G Glycol Reboiler | 0.50 MMBtu/hr | 8,760 hr/yr | 5,620.70 hr/yr | 2.56E+02 tpy | 4.83E-03 tpy | 4.83E-04 tpy | 2.56E+02 tpy |
| N/A | Pad I Glycol Reboiler | 0.25 MMBtu/hr | 8,760 hr/yr | 7,047.25 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad J Glycol Reboiler #1 | 0.25 MMBtu/hr | 8,760 hr/yr | 6,752.25 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| N/A | Pad J Glycol Reboiler #2 | 0.18 MMBtu/hr | 8,760 hr/yr | 2,857.30 hr/yr | 8.97E+01 tpy | 1.69E-03 tpy | 1.69E-04 tpy | 8.98E+01 tpy |
| N/A | Pad J Glycol Reboiler #3 | 0.13 MMBtu/hr | 8,760 hr/yr | 7,024.90 hr/yr | 6.40E+01 tpy | 1.21E-03 tpy | 1.21E-04 tpy | 6.41E+01 tpy |
| N/A | Pad K Glycol Reboiler | 0.25 MMBtu/hr | 8,760 hr/yr | 6,735.80 hr/yr | 1.28E+02 tpy | 2.41E-03 tpy | 2.41E-04 tpy | 1.28E+02 tpy |
| <i>Glycol Dehydrator Vents</i> | | | | | | | | |
| 4 | Pad H Glycol Dehydration Vent #1 | 5.53 MMsctd | 8,760 hr/yr | 6,852.05 hr/yr | 0.72 tpy | 0 tpy | 0 tpy | 7.23E-01 tpy |
| 5 | Pad H Glycol Dehydration Vent #2 | 55 MMsctd | 8,760 hr/yr | 6,174.30 hr/yr | 1.76 tpy | 0 tpy | 0 tpy | 1.76E+00 tpy |
| 6 | Pad H Glycol Dehydration Vent #3 | 55 MMsctd | 8,760 hr/yr | 6,198.35 hr/yr | 0.88 tpy | 0 tpy | 0 tpy | 8.85E-01 tpy |
| 7 | Pad A Glycol Dehydration Vent | 0.45 MMsctd | 8,760 hr/yr | 24.00 hr/yr | 0.73 tpy | 0 tpy | 0 tpy | 7.31E-01 tpy |
| 8 | Pad B Glycol Dehydration Vent | 0.27 MMsctd | 8,760 hr/yr | 3,556.75 hr/yr | 0.32 tpy | 0 tpy | 0 tpy | 3.24E-01 tpy |
| 9 | Pad C Glycol Dehydration Vent #1 | 5.14 MMsctd | 8,760 hr/yr | 6,870.40 hr/yr | 0.43 tpy | 0 tpy | 0 tpy | 4.33E-01 tpy |
| 10 | Pad C Glycol Dehydration Vent #2 | 5.14 MMsctd | 8,760 hr/yr | 2,338.65 hr/yr | 0.19 tpy | 0 tpy | 0 tpy | 1.89E-01 tpy |
| 13 | Pad D Glycol Dehydration Vent | 3.92 MMsctd | 8,760 hr/yr | 7,114.25 hr/yr | 0.42 tpy | 0 tpy | 0 tpy | 4.19E-01 tpy |
| 14 | Pad E Glycol Dehydration Vent #1 | 1.99 MMsctd | 8,760 hr/yr | 6,094.70 hr/yr | 0.28 tpy | 0 tpy | 0 tpy | 2.81E-01 tpy |
| 15 | Pad E Glycol Dehydration Vent #2 | 3.87 MMsctd | 8,760 hr/yr | 7,158.45 hr/yr | 0.08 tpy | 0 tpy | 0 tpy | 8.32E-02 tpy |
| 16 | Pad F Glycol Dehydration Vent | 6.71 MMsctd | 8,760 hr/yr | 7,155.90 hr/yr | 0.95 tpy | 0 tpy | 0 tpy | 9.46E-01 tpy |
| 17 | Pad G Glycol Dehydration Vent | 2.10 MMsctd | 8,760 hr/yr | 5,620.70 hr/yr | 0.26 tpy | 0 tpy | 0 tpy | 2.60E-01 tpy |
| 18 | Pad I Glycol Dehydration Vent | 3.05 MMsctd | 8,760 hr/yr | 7,047.25 hr/yr | 0.21 tpy | 0 tpy | 0 tpy | 2.06E-01 tpy |
| 21 | Pad J Glycol Dehydration Vent #1 | 2.37 MMsctd | 8,760 hr/yr | 6,752.25 hr/yr | 1.17 tpy | 0 tpy | 0 tpy | 1.17E+00 tpy |
| 22 | Pad J Glycol Dehydration Vent #2 | 2.37 MMsctd | 8,760 hr/yr | 2,857.30 hr/yr | 1.16 tpy | 0 tpy | 0 tpy | 1.16E+00 tpy |
| 23 | Pad J Glycol Dehydration Vent #3 | 2.37 MMsctd | 8,760 hr/yr | 7,024.90 hr/yr | 1.41 tpy | 0 tpy | 0 tpy | 1.41E+00 tpy |
| 24 | Pad K Glycol Dehydration Vent | 3.53 MMsctd | 8,760 hr/yr | 6,735.80 hr/yr | 0.23 tpy | 0 tpy | 0 tpy | 2.30E-01 tpy |
| <i>Insignificant Heaters</i> | | | | | | | | |
| 11 | Process Heater | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 5.12E+02 tpy | 9.66E-03 tpy | 9.66E-04 tpy | 5.13E+02 tpy |
| 20 | Process Heater | 1 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 5.12E+02 tpy | 9.66E-03 tpy | 9.66E-04 tpy | 5.13E+02 tpy |
| 25 | Process Heater | 0.125 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 6.40E+01 tpy | 1.21E-03 tpy | 1.21E-04 tpy | 6.41E+01 tpy |
| 29 | Office Coleman Heater | 0.06 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 3.07E+01 tpy | 5.79E-04 tpy | 5.79E-05 tpy | 3.08E+01 tpy |
| 30 | Shop Perfection Schwank Heater | 0.02 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 1.02E+01 tpy | 1.93E-04 tpy | 1.93E-05 tpy | 1.03E+01 tpy |
| 31 | Electrical Shop Modine Heater | 0.03 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 1.54E+01 tpy | 2.90E-04 tpy | 2.90E-05 tpy | 1.54E+01 tpy |
| 32 | Mechanics Shop Modine Heater | 0.11 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 5.64E+01 tpy | 1.06E-03 tpy | 1.06E-04 tpy | 5.64E+01 tpy |
| 33 | Mechanics Shop Modine Heater | 0.3 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 1.54E+02 tpy | 2.90E-03 tpy | 2.90E-04 tpy | 1.54E+02 tpy |
| 34 | BRWD Heater | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 2.56E+02 tpy | 4.83E-03 tpy | 4.83E-04 tpy | 2.56E+02 tpy |
| 35 | Mechanics Shop Used Oil Heater | 0.5 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 3.57E+02 tpy | 1.45E-02 tpy | 2.90E-03 tpy | 3.58E+02 tpy |
| 36 | Portable Frost Fighter | 0.4 MMBtu/hr | 8,760 hr/yr | 8,760 hr/yr | 2.86E+02 tpy | 1.16E-02 tpy | 2.32E-03 tpy | 2.87E+02 tpy |
| Totals | | | | | 4,276 tpy | 9,43E-02 tpy | 1.20E-02 tpy | 4,282 tpy |

Notes:
² Expected actual annual emissions are not required to be calculated for insignificant emission units. No insignificant emission units at Beluga River that are insignificant on an emission rate basis have potential annual emissions exceeding 80% of the thresholds.

Conversions:
 Fuel Gas Heat Content: 1,000 Btu/scf
 Diesel Fuel Heat Content: 137,000 Btu/gal
 Diesel Fuel Density: 7 lb/gal
 Diesel Engine Heat Rate: 7,000 Btu/hp-hr
 NG Engine Heat Rate: 8,000 Btu/hp-hr
 Municipal Solid Waste HHV: 9.95 MMBtu/short ton

| GHG Emission Factors (kg/MMBtu): | Fuel Gas | Diesel | GWP |
|----------------------------------|----------|----------|-----|
| CO ₂ | 53.06 | 73.96 | 1 |
| CH ₄ | 1.00E-03 | 3.00E-03 | 25 |
| N ₂ O | 1.00E-04 | 6.00E-04 | 298 |

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-9. Gas-Fired Turbines - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Total Assessable and Unlimited Heat Input: 539,616 MMBtu/yr¹
Total Estimated Actual Heat Input: 379,293 MMBtu/yr¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | EU ID 1 | |
|--------------------------------------|---------|-------------------------------|---------------------------------------|--|----------------------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | Assessable and Unlimited Potential Emissions | Estimated Actual Emissions |
| 35 | 75070 | Acetaldehyde | 4.00E-05 lb/MMBtu | 1.08E-02 tpy | 7.59E-03 tpy |
| 39 | 107028 | Acrolein | 6.40E-06 lb/MMBtu | 1.73E-03 tpy | 1.21E-03 tpy |
| 48 | 71432 | Benzene | 1.20E-05 lb/MMBtu | 3.24E-03 tpy | 2.28E-03 tpy |
| 99 | 100414 | Ethyl benzene | 3.20E-05 lb/MMBtu | 8.63E-03 tpy | 6.07E-03 tpy |
| 109 | 5000 | Formaldehyde | 7.10E-04 lb/MMBtu | 1.92E-01 tpy | 1.35E-01 tpy |
| 145 | 91203 | Naphthalene | 1.30E-06 lb/MMBtu | 3.51E-04 tpy | 2.47E-04 tpy |
| 162 | N/A | Polycyclic Organic Matter | 2.20E-06 lb/MMBtu | 5.94E-04 tpy | 4.17E-04 tpy |
| 176 | 108883 | Toluene | 1.30E-04 lb/MMBtu | 3.51E-02 tpy | 2.47E-02 tpy |
| 188 | 106423 | Xylenes (isomers and mixture) | 6.40E-05 lb/MMBtu | 1.73E-02 tpy | 1.21E-02 tpy |
| | | | Total HAP Emissions | 0.27 tpy | 0.19 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation, permit-limited operation, or actual operation estimated as the average of 2016 - 2017 hours of operation as noted below:

| | | | | |
|--------------|---|-------|--------------------|-------------|
| (1) 7,700 hp | Solar Taurus 60 Compressor Drive | | | |
| | Assessable and Unlimited Potential Heat Input (EU ID 1) | | 539,616.0 MMBtu @ | 8,760 hr/yr |
| | Estimated Actual Heat Input (EU ID 1) | | 379,292.8 MMBtu @ | 6,157 hr/yr |
| | Total Potential Heat Input | TOTAL | 539,616.0 MMBtu/yr | |
| | Total Estimated Actual Heat Input | TOTAL | 379,292.8 MMBtu/yr | |

² Reference: AP-42, Tables 3.1-3

Permit Number:

AQ0942TVP01, Rev. 2

Table D-11a. Gas-Fired Heaters - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit

Total Actual and Potential Fuel Use: 28 MMscf/yr¹

| No. | CAS No. | Chemical Name | Source Category Emission Calculations | | Assessable and Unlimited Potential Emissions | | | | | | | |
|----------------------------|---------|---------------------|---------------------------------------|---------------------|--|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| | | | Emission Factor ² | All Units | Each of EU ID 11/20 | EU ID 25 | EU ID 29 | EU ID 30 | EU ID 31 | EU ID 32 | EU ID 33 | EU ID 34 |
| 46 | N/A | Arsenic Compounds | 2.00E-04 lb/MMscf | 2.76E-06 tpy | 8.76E-07 tpy | 1.10E-07 tpy | 5.26E-08 tpy | 1.75E-08 tpy | 2.63E-08 tpy | 9.64E-08 tpy | 2.63E-07 tpy | 4.38E-07 tpy |
| 48 | 71432 | Benzene | 2.10E-03 lb/MMscf | 2.89E-05 tpy | 9.20E-06 tpy | 1.15E-06 tpy | 5.52E-07 tpy | 1.84E-07 tpy | 2.76E-07 tpy | 1.01E-06 tpy | 2.76E-06 tpy | 4.60E-06 tpy |
| 58 | N/A | Cadmium Compounds | 1.10E-03 lb/MMscf | 1.52E-05 tpy | 4.82E-06 tpy | 6.02E-07 tpy | 2.89E-07 tpy | 9.64E-08 tpy | 1.45E-07 tpy | 5.30E-07 tpy | 1.45E-06 tpy | 2.41E-06 tpy |
| 75 | N/A | Chromium Compounds | 1.40E-03 lb/MMscf | 1.93E-05 tpy | 6.13E-06 tpy | 7.67E-07 tpy | 3.68E-07 tpy | 1.23E-07 tpy | 1.84E-07 tpy | 6.75E-07 tpy | 1.84E-06 tpy | 3.07E-06 tpy |
| 109 | 5000 | Formaldehyde | 7.50E-02 lb/MMscf | 1.03E-03 tpy | 3.29E-04 tpy | 4.11E-05 tpy | 1.97E-05 tpy | 6.57E-06 tpy | 9.86E-06 tpy | 3.61E-05 tpy | 9.86E-05 tpy | 1.64E-04 tpy |
| 118 | 110543 | N-Hexane | 1.80E+00 lb/MMscf | 2.48E-02 tpy | 7.88E-03 tpy | 9.86E-04 tpy | 4.73E-04 tpy | 1.58E-04 tpy | 2.37E-04 tpy | 8.67E-04 tpy | 2.37E-03 tpy | 3.94E-03 tpy |
| 127 | N/A | Manganese Compounds | 3.80E-04 lb/MMscf | 5.23E-06 tpy | 1.66E-06 tpy | 2.08E-07 tpy | 9.99E-08 tpy | 3.33E-08 tpy | 4.99E-08 tpy | 1.83E-07 tpy | 4.99E-07 tpy | 8.32E-07 tpy |
| 128 | N/A | Mercury Compounds | 2.60E-04 lb/MMscf | 3.58E-06 tpy | 1.14E-06 tpy | 1.42E-07 tpy | 6.83E-08 tpy | 2.28E-08 tpy | 3.42E-08 tpy | 1.25E-07 tpy | 3.42E-07 tpy | 5.69E-07 tpy |
| 145 | 91203 | Naphthalene | 6.10E-04 lb/MMscf | 8.40E-06 tpy | 2.67E-06 tpy | 3.34E-07 tpy | 1.60E-07 tpy | 5.34E-08 tpy | 8.02E-08 tpy | 2.94E-07 tpy | 8.02E-07 tpy | 1.34E-06 tpy |
| 147 | 98953 | Nitrobenzene | 2.10E-03 lb/MMscf | 2.89E-05 tpy | 9.20E-06 tpy | 1.15E-06 tpy | 5.52E-07 tpy | 1.84E-07 tpy | 2.76E-07 tpy | 1.01E-06 tpy | 2.76E-06 tpy | 4.60E-06 tpy |
| 176 | 108883 | Toluene | 3.40E-03 lb/MMscf | 4.68E-05 tpy | 1.49E-05 tpy | 1.86E-06 tpy | 8.94E-07 tpy | 2.98E-07 tpy | 4.47E-07 tpy | 1.64E-06 tpy | 4.47E-06 tpy | 7.45E-06 tpy |
| Total HAP Emissions | | | 2.60E-02 tpy | 8.26E-03 tpy | 8.26E-03 tpy | 1.03E-03 tpy | 4.96E-04 tpy | 1.65E-04 tpy | 2.48E-04 tpy | 9.09E-04 tpy | 2.48E-03 tpy | 4.13E-03 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation as noted below:

Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

| | | | |
|--------------------|--------------------------------|--|--------------------------------|
| (2) 1.0 MMBtu/hr | Process Heater | Actual and Potential Fuel Use (each of EU IDs 11 & 20) | 8.76 MMscf @ 8,760 hr/yr, each |
| (1) 0.125 MMBtu/hr | Process Heater | Actual and Potential Fuel Use (EU ID 25) | 1.1 MMscf @ 8,760 hr/yr |
| (1) 0.06 MMBtu/hr | Office Coleman Heater | Actual and Potential Fuel Use (EU ID 29) | 0.5 MMscf @ 8,760 hr/yr |
| (1) 0.02 MMBtu/hr | Shop Perfection Schwank Heater | Actual and Potential Fuel Use (EU ID 30) | 0.2 MMscf @ 8,760 hr/yr |
| (1) 0.03 MMBtu/hr | Electrical Shop Modine Heater | Actual and Potential Fuel Use (EU ID 31) | 0.3 MMscf @ 8,760 hr/yr |
| (1) 0.11 MMBtu/hr | Mechanics Shop Modine Heater | Actual and Potential Fuel Use (EU ID 32) | 1.0 MMscf @ 8,760 hr/yr |
| (1) 0.30 MMBtu/hr | Mechanics Shop Modine Heater | Actual and Potential Fuel Use (EU ID 33) | 2.6 MMscf @ 8,760 hr/yr |
| (1) 0.50 MMBtu/hr | BRWD Heater | Actual and Potential Fuel Use (EU ID 34) | 4.4 MMscf @ 8,760 hr/yr |

Total Actual and Potential Fuel Use: TOTAL 27.6 MMscf/yr

² Reference: AP-42, Table 1.4-3 & 1.4-4

³ Actual emissions for units that are considered insignificant under 18 AAC 50.326(g) are not required to be included in accordance with the instructions for D forms.

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-11b. Gas-Fired Heaters - Assessable and Unlimited Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Total Assessable and Unlimited Potential Fuel Use: 34 MMscf/yr ¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | Assessable and Unlimited Potential Emissions |
|--------------------------------------|---------|---------------------|---------------------------------------|--|
| No. | CAS No. | Chemical Name | Emission Factor ² | Insignificant Reboilers |
| 46 | N/A | Arsenic Compounds | 2.00E-04 lb/MMscf | 3.44E-06 tpy |
| 48 | 71432 | Benzene | 2.10E-03 lb/MMscf | 3.61E-05 tpy |
| 58 | N/A | Cadmium Compounds | 1.10E-03 lb/MMscf | 1.89E-05 tpy |
| 75 | N/A | Chromium Compounds | 1.40E-03 lb/MMscf | 2.41E-05 tpy |
| 109 | 5000 | Formaldehyde | 7.50E-02 lb/MMscf | 1.29E-03 tpy |
| 118 | 110543 | n-Hexane | 1.80E+00 lb/MMscf | 3.09E-02 tpy |
| 127 | N/A | Manganese Compounds | 3.80E-04 lb/MMscf | 6.53E-06 tpy |
| 128 | N/A | Mercury Compounds | 2.60E-04 lb/MMscf | 4.47E-06 tpy |
| 145 | 91203 | Naphthalene | 6.10E-04 lb/MMscf | 1.05E-05 tpy |
| 147 | 98953 | Nitrobenzene | 2.10E-03 lb/MMscf | 3.61E-05 tpy |
| 176 | 108883 | Toluene | 3.40E-03 lb/MMscf | 5.85E-05 tpy |
| | | | Total HAP Emissions | 3.24E-02 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation as noted below:
(17) Insignificant Glycol Reboilers, total rating

3.93 MMBtu/hr

Assessable and Unlimited Potential Fuel Use

34.383 MMscf @ 8,760.0

Total Assessable and Unlimited Potential Fuel Use:

TOTAL

34.4 MMscf/yr

² Reference: AP-42, Table 1.4-3 & 1.4-4

Conversions:

Fuel Gas Heat Content:

1,000 Btu/scf

³ Actual emissions for units that are considered insignificant under 18 AAC 50.326(g) are not required to be included in accordance with the instructions for D forms.

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-12. Insignificant Diesel-Fired Heater - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Total Actual and Potential Fuel Use: 26 kgal/yr ¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | Actual and Potential Emissions |
|--------------------------------------|---------|-------------------------------|---------------------------------------|--------------------------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | EU ID 36 |
| 48 | 71432 | Benzene | 2.14E-04 lb/kgal | 2.74E-06 tpy |
| 99 | 100414 | Ethyl benzene | 6.36E-05 lb/kgal | 8.13E-07 tpy |
| 109 | 5000 | Formaldehyde | 3.30E-02 lb/kgal | 4.22E-04 tpy |
| 145 | 91203 | Naphthalene | 1.13E-03 lb/kgal | 1.45E-05 tpy |
| 162 | N/A | Polycyclic Organic Matter | 5.01E-05 lb/kgal | 6.40E-07 tpy |
| 176 | 108883 | Toluene | 6.20E-03 lb/kgal | 7.93E-05 tpy |
| 188 | 106423 | Xylenes (isomers and mixture) | 1.09E-04 lb/kgal | 1.39E-06 tpy |
| | | | Total HAP Emissions | 5.21E-04 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation as noted below:

Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

(1) 0.4 MMBtu/hr Portable Frost Fighter
 Actual and Potential Fuel Use (EU ID 36) 25.6 kgal @ 8,760 hr/yr

Total Actual and Potential Fuel Use TOTAL 25.6 kgal/yr

² Reference: AP-42, Table 1.3-9

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-13. Insignificant Waste Oil Fired Heater - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Actual and Potential Fuel Use:

32 kgal/yr ¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | Actual and Potential Emissions |
|--------------------------------------|---------|-----------------------------------|---------------------------------------|--------------------------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | EU ID 35 |
| 12 | 106467 | 1,4-Dichlorobenzene(p) | 8.00E-07 lb/kgal | 1.28E-08 tpy |
| 45 | N/A | Antimony Compounds | 3.40E-04 lb/kgal | 5.44E-06 tpy |
| 46 | N/A | Arsenic Compounds | 2.50E-03 lb/kgal | 4.00E-05 tpy |
| 55 | 117817 | Bis(2-ethylhexyl)phthalate (DEHP) | 2.20E-03 lb/kgal | 3.52E-05 tpy |
| 58 | N/A | Cadmium Compounds | 1.50E-04 lb/kgal | 2.40E-06 tpy |
| 75 | N/A | Chromium Compounds | 1.90E-01 lb/kgal | 3.04E-03 tpy |
| 76 | N/A | Cobalt Compounds | 5.70E-03 lb/kgal | 9.11E-05 tpy |
| 127 | N/A | Manganese Compounds | 2.20E-03 lb/kgal | 3.52E-05 tpy |
| 145 | 91203 | Naphthalene | 1.30E-02 lb/kgal | 2.08E-04 tpy |
| 146 | N/A | Nickel Compounds | 5.00E-02 lb/kgal | 7.99E-04 tpy |
| 156 | 108952 | Phenol | 2.40E-03 lb/kgal | 3.84E-05 tpy |
| 158 | 7723140 | Phosphorus | 3.60E-02 lb/kgal | 5.75E-04 tpy |
| | | | Total HAP Emissions | 4.87E-03 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation as noted below:

Hours of operation are not required to be tracked for insignificant units. Therefore actual hours of operation are estimated as equal to the maximum full-time operation.

(1) 0.5 MMBtu/hr Mechanics Shop Used Oil Heater
Actual and Potential Fuel Use (EU ID 35)

32.0 kgal @ 8,760 hr/yr

Total Actual and Potential Fuel Use

TOTAL

32.0 kgal/yr

² Reference: AP-42, Table 1.11-4 and 1.11-5

Table D-14. Diesel-Fired Reciprocating ICE ≤ 600 hp - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit

Total Assessable Potential Heat Input: 986 MMBtu/yr¹
 Total Unlimited Potential Heat Input: 4,928 MMBtu/yr¹
 Total Estimated Actual Heat Input: 471 MMBtu/yr¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | Assessable Potential Emissions | | | | Unlimited Potential Emissions | | | | Estimated Actual Emissions | | | |
|--------------------------------------|---------|-------------------------------|---------------------------------------|--------------------------------|---------------------|---------------------|---------------------|-------------------------------|---------------------|---------------------|---------------------|----------------------------|---------------------|---------------------|---------------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | EU ID 3 | EU ID 12 | EU ID 19 | EU ID 42 | EU ID 3 | EU ID 12 | EU ID 19 | EU ID 42 | EU ID 3 | EU ID 12 | EU ID 19 | EU ID 42 |
| 9 | 106990 | 1,3-Butadiene | 3.91E-05 lb/MMBtu | 7.71E-06 tpy | 6.42E-06 tpy | 9.18E-07 tpy | 4.22E-06 tpy | 3.85E-05 tpy | 3.21E-05 tpy | 4.59E-06 tpy | 2.11E-05 tpy | 4.74E-06 tpy | 3.12E-06 tpy | 3.40E-07 tpy | 1.02E-06 tpy |
| 35 | 75070 | Acetaldehyde | 7.67E-04 lb/MMBtu | 1.51E-04 tpy | 1.26E-04 tpy | 1.80E-05 tpy | 8.28E-05 tpy | 7.56E-04 tpy | 6.30E-04 tpy | 9.00E-05 tpy | 4.14E-04 tpy | 9.31E-05 tpy | 6.12E-05 tpy | 6.67E-06 tpy | 1.99E-05 tpy |
| 39 | 107028 | Acrolein | 9.25E-05 lb/MMBtu | 1.82E-05 tpy | 1.52E-05 tpy | 2.17E-06 tpy | 9.99E-06 tpy | 9.12E-05 tpy | 7.60E-05 tpy | 1.09E-05 tpy | 4.99E-05 tpy | 1.12E-05 tpy | 7.38E-06 tpy | 8.04E-07 tpy | 2.40E-06 tpy |
| 48 | 71432 | Benzene | 9.33E-04 lb/MMBtu | 1.84E-04 tpy | 1.53E-04 tpy | 2.19E-05 tpy | 1.01E-04 tpy | 9.20E-04 tpy | 7.60E-04 tpy | 1.09E-04 tpy | 5.04E-04 tpy | 1.13E-04 tpy | 7.44E-05 tpy | 8.11E-06 tpy | 2.42E-05 tpy |
| 109 | 5000 | Formaldehyde | 1.18E-03 lb/MMBtu | 2.33E-04 tpy | 1.94E-04 tpy | 2.77E-05 tpy | 1.27E-04 tpy | 1.16E-03 tpy | 9.69E-04 tpy | 1.38E-04 tpy | 6.37E-04 tpy | 1.43E-04 tpy | 9.41E-05 tpy | 1.03E-05 tpy | 3.06E-05 tpy |
| 162 | N/A | Polycyclic Organic Matter | 1.68E-04 lb/MMBtu | 3.31E-05 tpy | 2.76E-05 tpy | 3.94E-06 tpy | 1.81E-05 tpy | 1.66E-04 tpy | 1.38E-04 tpy | 1.97E-05 tpy | 9.07E-05 tpy | 2.04E-05 tpy | 1.34E-05 tpy | 1.46E-06 tpy | 4.36E-06 tpy |
| 176 | 108883 | Toluene | 4.09E-04 lb/MMBtu | 8.06E-05 tpy | 6.72E-05 tpy | 9.60E-06 tpy | 4.42E-05 tpy | 4.03E-04 tpy | 3.36E-04 tpy | 4.80E-05 tpy | 2.21E-04 tpy | 4.96E-05 tpy | 3.29E-05 tpy | 3.56E-06 tpy | 1.06E-05 tpy |
| 188 | 106423 | Xylenes (isomers and mixture) | 2.85E-04 lb/MMBtu | 5.62E-05 tpy | 4.68E-05 tpy | 6.69E-06 tpy | 3.08E-05 tpy | 2.81E-04 tpy | 2.34E-04 tpy | 3.34E-05 tpy | 1.54E-04 tpy | 3.46E-05 tpy | 2.27E-05 tpy | 2.48E-06 tpy | 7.40E-06 tpy |
| Total HAP Emissions | | | | 7.64E-04 tpy | 6.36E-04 tpy | 9.09E-05 tpy | 4.18E-04 tpy | 3.82E-03 tpy | 3.18E-03 tpy | 4.55E-04 tpy | 2.09E-03 tpy | 4.70E-04 tpy | 3.09E-04 tpy | 3.37E-05 tpy | 1.01E-04 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation, permit-limited operation, or actual operation estimated as the average of 2016 - 2017 hours of operation as noted below:

| | | | | |
|---------------------------------------|--------------------|--|------------------|------------------------|
| (1) 420 kW | John Deere Engine | Assessable Potential Heat Input (EU ID 3) | 394 MMBtu/yr @ | 100 hr/yr ³ |
| | | Unlimited Potential Heat Input (EU ID 3) | 1,971 MMBtu/yr @ | 500 hr/yr ⁵ |
| | | Estimated Actual Heat Input (EU ID 3) | 243 MMBtu/yr @ | 62 hr/yr |
| (1) 350 kW | Cummins Engine | Assessable Potential Heat Input (EU ID 12) | 329 MMBtu/yr @ | 100 hr/yr ⁴ |
| | | Unlimited Potential Heat Input (EU ID 12) | 1,643 MMBtu/yr @ | 500 hr/yr ⁵ |
| | | Estimated Actual Heat Input (EU ID 12) | 160 MMBtu/yr @ | 49 hr/yr |
| (1) 50 kW | Detroit Engine | Assessable Potential Heat Input (EU ID 19) | 47 MMBtu/yr @ | 100 hr/yr ⁴ |
| | | Unlimited Potential Heat Input (EU ID 19) | 235 MMBtu/yr @ | 500 hr/yr ⁵ |
| | | Estimated Actual Heat Input (EU ID 19) | 17 MMBtu/yr @ | 37 hr/yr |
| (1) 230 kW | Caterpillar Engine | Assessable Potential Heat Input (EU ID 42) | 216 MMBtu/yr @ | 100 hr/yr ³ |
| | | Unlimited Potential Heat Input (EU ID 42) | 1,080 MMBtu/yr @ | 500 hr/yr ⁵ |
| | | Estimated Actual Heat Input (EU ID 42) | 52 MMBtu/yr @ | 24 hr/yr |
| Total Assessable Potential Heat Input | | TOTAL | 986 MMBtu/yr | |
| Total Unlimited Potential Heat Input | | TOTAL | 4,928 MMBtu/yr | |
| Total Estimated Actual Heat Input | | TOTAL | 471 MMBtu/yr | |

² Reference: AP-42, Tables 3.3-2

³ EU IDs 3 and 42 are limited to 100 hours per calendar year of operation by 40 CFR 60.4211, Subpart IIII.

⁴ EU IDs 12 and 19 are limited to 100 hours per calendar year of operation by 40 CFR 63.6640(f)(2), Subpart ZZZZ.

⁵ According to a memorandum from John S. Seltz of the EPA, 500 hours of operation is an appropriate default assumption for estimating the number of hours an emergency generator could be expected to operate per year.

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-15. Incinerator - Estimated Actual and Potential HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Total Assessable and Unlimited Potential Waste Burned: 657 tons/yr¹
Total Estimated Actual Waste Burned: 4 tons/yr¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | Assessable and Unlimited Potential Emissions | Estimated Actual Emissions |
|--------------------------------------|---------|--------------------|---------------------------------------|--|----------------------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | EU ID 26 | |
| 46 | N/A | Arsenic Compounds | 4.37E-03 lb/ton | 1.44E-03 tpy | 8.90E-06 tpy |
| 58 | N/A | Cadmium Compounds | 1.09E-02 lb/ton | 3.58E-03 tpy | 2.22E-05 tpy |
| 75 | N/A | Chromium Compounds | 8.97E-03 lb/ton | 2.95E-03 tpy | 1.83E-05 tpy |
| 120 | 7647010 | Hydrochloric acid | 6.40E+00 lb/ton | 2.10 tpy | 1.30E-02 tpy |
| 124 | N/A | Lead Compounds | 2.13E-01 lb/ton | 7.00E-02 tpy | 4.34E-04 tpy |
| 128 | N/A | Mercury Compounds | 5.60E-03 lb/ton | 1.84E-03 tpy | 1.14E-05 tpy |
| 146 | N/A | Nickel Compounds | 7.85E-03 lb/ton | 2.58E-03 tpy | 1.60E-05 tpy |
| | | | Total HAP Emissions | 2.18 tpy | 1.35E-02 tpy |

Notes/Comments:

¹ Total heat consumption based on maximum full-time operation, permit-limited operation, or actual operation estimated as the average of 2016 - 2017 hours of operation as noted below:

| | | | |
|----------------|---|--------------|--------------------|
| (1) 150 lbs/hr | Thermal Engine Corp. Incinerator | | |
| | Assessable and Unlimited Potential Tons Burned (EU ID 26) | 657 tons @ | 8,760 hr/yr |
| | Estimated Actual Tons Burned (EU ID 26) | 4.1 tons @ | 54.3 hr/yr |
| | Total Assessable and Unlimited Potential Tons Burned | TOTAL | 657 tons/yr |
| | Total Estimated Actual Tons Burned | TOTAL | 4 tons/yr |

² Reference: AP-42, Table 2.1-2

Permit Number:

AQ0942TVP01, Rev. 2

**Table D-16. Gasoline Dispensing Facility - Estimated Potential and Actual HAP Emissions
Hilcorp Alaska, LLC - Beluga River Unit**

Total Potential VOCs: 1.5 tpy¹

| Section 112 Hazardous Air Pollutants | | | Source Category Emission Calculations | | Actual and Potential Emissions | |
|--------------------------------------|---------|-------------------------------|--|---------|-----------------------------------|------------|
| No. | CAS No. | Chemical Name | Emission Factor ² | | EU ID 44 | |
| 14 | 540841 | 2,2,4-Trimethylpentane | 0.8 | wt.%VOC | 1.16E-02 | tpy |
| 48 | 71432 | Benzene | 0.9 | wt.%VOC | 1.31E-02 | tpy |
| 99 | 100414 | Ethyl benzene | 0.1 | wt.%VOC | 1.45E-03 | tpy |
| 118 | 110543 | N-Hexane | 1.6 | wt.%VOC | 2.32E-02 | tpy |
| 162 | N/A | Polycyclic Organic Matter | 0.5 | wt.%VOC | 7.26E-03 | tpy |
| 176 | 108883 | Toluene | 1.3 | wt.%VOC | 1.89E-02 | tpy |
| 188 | 106423 | Xylenes (isomers and mixture) | 0.5 | wt.%VOC | 7.26E-03 | tpy |
| Total HAP Emissions | | | | | 0.08 | tpy |

Notes/Comments:

¹ Total VOC based on full time operation as noted below:

Actual hours of operation are not required to be tracked and are assumed to be the same as full time operation.

(1) <10,000 gal/mo Gasoline Dispensing Facility
Potential VOC Emissions (EU ID 44)

1.5 tpy VOC

Total Potential VOCs:

TOTAL

1.5 tpy VOC

² Emission factors from Table 4, "Normal" column in *Developing a Consistent Methodology to Calculate VOC and HAP Evaporative Emissions for Stage I and Stage II Operations at Gasoline Service Stations for the 1999 NEI*

FORM E3
Title V Condition Change Request

Permit Number: AQ0942TVP01, Revision 2

Title V Permit Information (*attach additional sheets as needed*):

| Current Title V Operating Permit Condition Number | Type of change (revise or remove) | Reason for change | Requested Alaska Title V Operating Permit Condition |
|---|-----------------------------------|--|--|
| AQ0942TVP01, Rev. 2, Table A | Revise | EU ID 43 was installed in April 2015 and EU ID 44 was inadvertently left out of the original permit application. | Add EU IDs 43 and 44. Please see Form B for unit descriptions. |
| AQ0942TVP01, Rev. 2, Table A | Revise | EU ID 42 was installed in 2012 but the engine was manufactured in 2009 and certified to Tier 3 standards. | Add a footnote stating "EU ID 42 is a model year 2009 engine." |
| AQ0942TVP01, Rev. 2, Table A Note 2 | Revise | Revise the table note to account for the fact that the GDUs now only include the dehydrator vents. | Revise the footnote as follows: <u>"GDUs include only the dehydrator vents that are subject to recordkeeping under 40 CFR 63 Subpart HH. Glycol reboilers have been assigned separate IDs and moved to the insignificant emission unit list."</u> |
| AQ0942TVP01, Rev. 2, List of Abbreviations and Conditions | Revise | Corrects typographical error. | Please update "g/hphr" to "g/hp-hr." |
| AQ0942TVP01, Rev. 2, Conditions 1, 1.1, 6, 6.1, 9, 9.5-9.7, Condition 9.5 heading | Revise | Updates conditions to account for installation of EU 43. | Add reference to EU ID 43. |

FORM E3
Title V Condition Change Request

| | | | |
|--|--------|--|---|
| AQ0942TVP01, Rev. 2, Condition 2.3 | Revise | Clarifies when the VE observation is required if Condition 2.3 is triggered, and clarifies the information required by the VE observation form when conducting a VE observation under Condition 2.3. | “When required by Condition 2.2, observe visible emissions for 18 consecutive minutes to obtain a minimum of 72 observations in accordance with Method 9 of 40 CFR 60, Appendix A. <u>For each observation, record the information required by Condition 4.1. Complete the observation within 30 days after the end of the month during which the operational threshold in Condition 2.2 is exceeded or during the unit’s next scheduled operation, whichever is later. Method 9 monitoring is not required to be completed any more frequently than at least once each calendar year.</u> ” |
| AQ0942TVP01, Rev. 2, Condition 2.4 | Revise | Clarifies requirement, and is consistent with other VE reporting. | Replace with the following: 2.4. Report in accordance with Condition 5.1b. |
| AQ0942TVP01, Rev. 2, Condition 2.5 | Revise | Clarifies requirement, and is consistent with other VE reporting. | Replace with the following: 2.5. Report in accordance with Condition 5.2. |
| AQ0942TVP01, Rev. 2, Conditions 3, 3.1a, 4, 4.1, and 5.1 | Revise | Hilcorp does not utilize the Smoke/No Smoke Plan at any of its facilities. Removing the requirements streamlines the permit. | Revise conditions to delete all references to Smoke/No Smoke Plan and revise as necessary. |
| AQ0942TVP01, Rev. 2, Conditions 3.2, 3.3, 4.2 | Remove | Hilcorp does not utilize the Smoke/No Smoke Plan at any of its facilities. Removing the requirements streamlines the permit. | Conditions 3.2, 3.3, 4.2. <i>Remove.</i> |
| AQ0942TVP01, Rev. 2, Condition 5.2b | Revise | The additional reference ensures that Condition 5.2b requires reporting for failure to monitor under both Condition 3 and Condition 2.3. | Add reference to monitoring required by Condition 2.3. |

FORM E3
Title V Condition Change Request

| | | | |
|--|--------|---|---|
| AQ0942TVP01, Rev. 2, Condition 7.3 | Revise | The visible emissions limit is a 6-minute average opacity value. | Revise as indicated below: 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 <u>average</u> opacity that... |
| AQ0942TVP01, Rev. 2, Condition 8.2 | Revise | Corrects typographical error. | Please add a space between “7.2” and “within.” |
| AQ0942TVP01, Rev. 2, Conditions 8.3a and 8.3c | Revise | As indicated in Footnote 1 of the permit, all EUs subject to Condition 7.2 have a stack diameter less than 18 inches. Therefore, Condition 7.2 includes only one threshold. | Revise Condition 8.3a as indicated: a. the dates, EU IDs, and results when an observed 18-minute average was greater than an applicable <u>the</u> threshold in Condition 7.2. Revise Condition 8.3c as indicated: c. copies of any VE observation results (opacity observations) greater than the thresholds <u>threshold</u> of Condition 7.2, if they were not already submitted. |
| AQ0942TVP01, Rev. 2, Condition 9.1b | Revise | The requirement to keep a receipt specifying a fuel grade and amount is only relevant for fuel that requires a sulfur content less than 0.5 percent by weight as described in Condition 9.1a. Condition 9.1b requires testing of fuels that do not require a sulfur content less than 0.5 percent by weight, so there is no point in requiring that receipts be kept regarding delivery of this type of fuel. | Revise as indicated: b. If the fuel grade does not require a sulfur content less than 0.5 percent by weight, keep receipts that specify fuel grade and amount and |

FORM E3
Title V Condition Change Request

| | | | |
|---|--------|---|---|
| AQ0942TVP01, Rev. 2, Condition 9.2 | Revise | No fuel testing is required under Condition 9.1a. A method does not have to be listed in both 18 AAC 50.035(b)-(c) and 40 C.F.R. 60.17 to be preapproved for use. | Revise as indicated: 9.2. Fuel testing under Condition 9.1 <u>9.1.b</u> must follow an appropriate method listed in 18 AAC 50.035(b)-(c) and or 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1). |
| AQ0942TVP01, Rev. 2, Condition 9.3 | Revise | Consistent with language used in Condition 9.1. | Replace the word “load” with the word “shipment.” |
| AQ0942TVP01, Rev. 2, Conditions 10.2 and 10.3. | Revise | Corrects language. | Replace the phrase “maintain records <u>for</u> ” with the phrase “maintain records <u>of</u> ” in Condition 10.2 and Condition 10.3. |
| AQ0942TVP01, Rev. 2, Conditions 12, 23.1 and Footnote 4 | Revise | Corrects typographical error. | Please change “EU 37” to “EU <u>ID</u> 37.” |
| AQ0942TVP01, Rev. 2, Condition 12.1 | Revise | More exact language as indicated will decrease confusion. | Revise as indicated: 12.1. Include the following information regarding the emission units included in EU ID 37 in the operating reports submitted under Condition 66: <ul style="list-style-type: none"> a. <u>the</u> number of emission units <u>individual units</u> operated <u>as EU ID 37</u> during the reporting period; b. <u>the</u> rated capacity of each <u>individual emission</u> unit; c. <u>the</u> aggregate capacity of all emission units <u>EU ID 37 units</u>; and d. <u>the</u> location of each emission unit. |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 13 | Revise | Remove EU ID 26 from this condition per the Application for Significant Modification submitted on February 7, 2018. | Revise the condition to remove reference to EU ID 26. |
| AQ0942TVP01, Rev. 2, Condition 14.4 citation | Revise | Corrects citation. | Please add "Subpart A" to the citation. |
| AQ0942TVP01, Rev.2, Footnotes 2 and 3. | Revise | Remove outdated effective dates. | Please remove "effective 7/1/07." |
| AQ0942TVP01, Rev. 2, Condition 18 | Revise | Correct a typographical error. | Update the language as described below: "...of any credible evidence or information relevant to whether EU IDs-1 would have been in compliance..." |
| AQ0942TVP01, Rev. 2, Conditions 20.1, 20.2, 21, and 22 | Revise | A citation of the location in 18 AAC 50 where Subpart III is adopted by reference should be included. | In citations associated with these condition, revise the first citation as follows: [18 AAC 50.040(c)(23)(a)(2)(OO); 18 AAC 50.040(j)(4); 18 AAC 50.326(j)] |
| AQ0942TVP01, Rev. 2, Condition 21 | Revise | 60.4201(d) applies to manufacturers of marine CI engines, and is not relevant to EU IDs 3 or 42. 60.4204(b) applies to non-emergency CI engines. 60.4205(b) applies to emergency CI engines. Hilcorp requests a reclassification of EU IDs 3 and 42 as emergency engines under Subpart III. | Revise the condition to require compliance with the emissions standards for new CI engines in <u>60.4205(b)</u> (instead of 60.4204). In the citation, delete the reference to 60.4201(d) and change the reference from 60.4204(b) to <u>60.4205(b)</u> . |
| AQ0942TVP01, Rev. 2, Condition 21 citation | Revise | Correct a typographical error. | Please add brackets to the last citation. |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 22 | Revise | Correct a formatting error. | Please update the formatting of the condition to make the following not bold: “For EU IDs 3 and 42, the...” |
| AQ0942TVP01, Rev. 2, Condition 22 | Revise | 60.4209(b) does not apply because neither EU 3 nor EU 42 is equipped with a particulate filter to comply with 60.4204. | In citation, delete reference to 60.4209(b). |
| AQ0942TVP01, Rev. 2, Condition 22.1 | Revise | Update permit condition to clarify requirements. The correct citation and permit language in Condition 22.1 are from 60.4211(c) because EU 3 and EU 42 are MY2007 or later engines (EU 3 is MY 2008 and EU 42 is MY 2009). 60.4202(g) and 60.4216(b) contain the specific language that allows an engine located in areas of Alaska not accessible by the FAHS to be certified according to the provisions of 40 CFR 94. | Revise the condition as follows: 22.1. Purchasing <u>Purchase</u> an engine certified according to 40 C.F.R. Part 89 or 40 C.F.R. Part 94, as applicable, for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's <u>emissions-related</u> specifications, <u>except as permitted in Condition 22.2.</u> [40 C.F.R. 60.4211(c) (b) , 60.4202(g), 60.4216(b), Subpart III] |
| AQ0942TVP01, Rev. 2, Condition 23 | Revise | Addresses changes necessary to add EU 43, clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations. | Revise as indicated below: 23. NSPS Subpart JJJJ Standards: For engines included in EU ID 37, <u>and for EU ID 43</u> , the Permittee shall comply with the standards in Conditions 23.1 through 23.5 <u>23.6.</u> [18 AAC 50.040(a)(2)(PP) & (j)(4); 18 AAC 50.326(j)] [40 C.F.R. 71.6(a)(1)] [40 C.F.R. 60.4230(a)(4), <u>Subpart JJJJ</u>] |

FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP01, Rev. 2, Condition 23.1</p> | <p>Revise</p> | <p>Clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations.</p> | <p>Revise as indicated below:</p> <p>23.1. The Permittee shall not allow emissions from any engine included in EU <u>ID 37</u> to exceed:</p> <ul style="list-style-type: none"> a. 1.0 gram per horsepower-hour (g/hp-hr^{hp-hr}) or 82 parts per million by dry volume (ppmvd) at 15% O₂ for NO_x; b. 2.0 g/hp-hr^{hp-hr} or 270 ppmvd at 15% O₂ for CO; and a. 0.7 g/hp-hr^{hp-hr} or 60 ppmvd at 15% O₂ for VOC. Do not include emissions of formaldehyde when calculating VOC emissions. <p>[40 C.F.R. 60.4233(e), Table 1, & Table 1 Footnote d, <u>Subpart JJJJ</u>]</p> |
| <p>AQ0942TVP01, Rev. 2, Condition 23.2</p> | <p>Revise</p> | <p>Addresses changes necessary to add EU 43, clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations.</p> | <p>Re-number this condition to 23.3 and revise as indicated below:</p> <p>23.2. <u>23.3</u> Operate and maintain each engine <u>included in EU ID 37 and EU ID 43</u> such that the emission standards in Condition 23.1 <u>Conditions 23.1 and 23.2</u> are met over the lifetime of the engine.</p> <p>[40 C.F.R. 60.4234, <u>Subpart JJJJ</u>]</p> |

FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP01, Rev. 2, Condition 23.3</p> | <p>Revise</p> | <p>Addresses changes necessary to add EU 43, clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations.</p> | <p>Re-number this condition to 23.4 and revise as indicated below:</p> <p>23.3. <u>23.4.</u> The Permittee shall demonstrate compliance with the emissions standards in Conditions <u>23.1 and 23.2</u> as follows:</p> <p>a. For <u>EU ID 43</u> and each engine <u>included in EU ID 37</u> less than or equal to 500 HP, keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test to demonstrate compliance. If the engine has been rebuilt (as defined in 40 CFR 94.11(a)), conduct an additional performance test within 180 days of the subsequent startup of the emission unit.</p> <p>b. For each engine <u>included in EU ID 37</u> greater than 500 HP, keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, you must conduct an initial performance test and conduct subsequent performance testing every 8,760 hours or 3 years, whichever comes first, thereafter to demonstrate compliance.</p> <p>c. If utilized, the air to fuel ratio must be maintained and operated appropriately to ensure proper operation of the engine and control device to minimize emissions at all times. <u>For rich burn engines included in EU ID 37 and for EU ID 43, it is expected that air-to-fuel ratio controllers will be used with the operation of three-way catalysts/non-selective catalytic reduction. The AFR controller must be maintained and operated appropriately in order to ensure proper operation of the engine and control device to minimize emissions at all times.</u></p> <p>[40 C.F.R. 60.4243(b)(2) & 40 C.F.R. 60.4243(f) & (g), <u>Subpart JJJJ</u>]</p> |
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FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP01, Rev. 2, Condition 23.4</p> | <p>Revise</p> | <p>Addresses changes necessary to add EU 43, clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations.</p> | <p>Renumber to 23.5 and revise as indicated below:</p> <p>23.4. <u>23.5</u> The Permittee shall conduct all performance tests required under Condition 23.3 <u>23.4</u> in accordance with 40 CFR 60.4244.</p> <p style="text-align: right;">[40 C.F.R. 60.4243(b)(2), <u>Subpart JJJJ</u>] [40 C.F.R. 60.4244(d) —(g), <u>Subpart JJJJ</u>]</p> |
| <p>AQ0942TVP01, Rev. 2, Condition 23.5</p> | <p>Revise</p> | <p>Addresses changes necessary to add EU 43, clarifies requirements, incorporates exact rule language, corrects typographical errors, and corrects citations.</p> | <p>Renumber to 23.6 and revise as indicated below:</p> <p>23.5. <u>23.6</u> The Permittee shall meet the following notification, reporting, and recordkeeping requirements <u>for EU IDs 37 and 43</u>:</p> <p>a. Keep records of</p> <ul style="list-style-type: none"> (i) all notifications submitted to comply with Subpart JJJJ and all documentations supporting any notification; (ii) maintenance conducted on the <u>engines engine(s)</u>; and (iii) documentation that the engine meets <u>engines meet the</u> emission standards. <p style="text-align: right;">[40 C.F.R. 60.4245(a)(1), (2), & (4), <u>Subpart JJJJ</u>]</p> <p>b. Submit to the Department <u>and EPA</u> a copy of each performance test as required in Condition 23.3 <u>23.4</u> within 60 days after completion of the test.</p> <p style="text-align: right;">[40 C.F.R. 60.4245(d), <u>Subpart JJJJ</u>]</p> |

FORM E3
Title V Condition Change Request

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| AQ0942TVP02, Rev. 2, Conditions 24.1- 24.5 | Revise | Corrects a formatting error. | Please bold the initial statements, e.g., NOx Emission Standard . |
| AQ0942TVP02, Rev. 2, Condition 24.2 | Revise | In conjunction with the change to Condition 24.5 requested below, the change to Condition 24.2 clarifies the testing requirement. Note that Conditions 24.2a and 24.2b describe when testing is allowed to be completed less frequent than annually. | Revise as indicated below: 24.2. NOx Emissions Standard Monitoring. The Permittee shall perform annual performance tests <u>(no more than 14 calendar months following the previous performance test)</u> in accordance with Condition 24.5 to demonstrate continuous compliance, as follows: <u>except as allowed under Conditions 24.2a and 24.2b.</u> |
| AQ0942TVP02, Rev. 2, Condition 24.2b | Revise | The referenced limit is in Condition 24.1 and not in Condition 24. Also correct the citation to state 60.4400 instead of just 4400. | Please revise as indicated below: 24.2 b. If the results of any subsequent performance test exceed 75 percent of the NOx emission limit in Condition <u>24.1</u> , the Permittee must resume annual performance tests. [40 CFR 60.4340(a) & <u>60.4400</u>] |
| AQ0942TVP02, Rev. 2, Condition 24.3 | Revise | Corrects typographical error. | Please revise as indicated below: “...keep records of all performance tests <u>test</u> data in ...” |
| AQ0942TVP02, Rev. 2, Condition 24.4 | Revise | Should reference Condition 60 which is the Source Test report condition rather than the Operating Report condition, Condition 66. | Please revise as indicated below: 24.4. Reporting. The Permittee shall submit a written report of the results of each performance test required under Conditions 24.2 and 24.5 before the close of business on the 60 th day following the completion of the performance test and in accordance with Condition 66 <u>60</u> . |

FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP02, Rev. 2, Condition 24.5</p> | <p>Revise</p> | <p>In conjunction with the change to Condition 24.2 requested above, the proposed change to Condition 24.5 clarifies the testing requirement.</p> <p>In conjunction with the request to remove Conditions 24.5a-24.5f (see below), the proposed change to Condition 24.5 replaces the detailed test methodology language with a reference to the rule.</p> | <p>Revise as indicated below:</p> <p>24.5. Performance Tests. The Permittee shall conduct an initial performance test as required in Condition 16, and conduct subsequent NOx performance tests on an annual basis (no more than 14 calendar months following the previous performance test), as provided in Conditions 24.2.a and 24.2.b. <u>Performance tests shall be conducted in accordance with 40 C.F.R 60.4400.</u></p> |
| <p>AQ0942TVP02, Rev. 2, Condition 24.5.a - f</p> | <p>Remove</p> | <p>We propose to add the reference to the test methods in Condition 24.5 (see above). This approach is both preferable and practical because it simplifies the permit and the test methodology is directly utilized by the source test contractor, not the Permittee. The source test contractor should refer directly to the rule to determine the required testing procedures and not to the permit.</p> | <p>Conditions 24.5 a – f. <i>Remove.</i></p> |

FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP02, Rev. 2, Condition 27, Condition 27 header</p> | <p>Revise</p> | <p>Add reference to 40 CFR 60 Subpart OOOOa and incorporate updates to Subpart OOOO, and corrects some typographical errors.</p> | <p>Please revise the condition as follows:</p> <p><u>Equipment Potentially Subject to NSPS Subpart OOOO and Subpart OOOOa</u></p> <p>27. The Permittee shall comply with the requirements of 40 CFR <u>60</u> Subpart OOOO (Standards of Performance for Crude Oil and Natural Gas Production, Transmission, and Distribution <u>for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015</u>) and 40 CFR 60 Subpart OOOOa (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after September 18, 2015), as applicable, to any gas <u>or oil</u> well, centrifugal compressor, reciprocating compressor, pneumatic controller, <u>pneumatic pump</u>, collection of fugitive emissions components at <u>wellsites and/or compressor stations</u>, and storage vessel affected facility located at the stationary source. <p style="text-align: right;">[40 CFR 60.5360 – 5430, Subpart OOOO] [40 CFR 60.5360a-5432a, Subpart OOOOa]</p> </p> |
| <p>AQ0942TVP02, Rev. 2, Condition 28 header</p> | <p>Revise</p> | <p>Corrects typographical error.</p> | <p>Please revise the header for Condition 28 as follows:</p> <p>Emission Units Subject to NESHAPS <u>NESHAP</u> Subpart A (EU IDs 2, 12, 19, 4-10, 13-18, and 21-24, and 44)</p> |

FORM E3
Title V Condition Change Request

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| <p>AQ0942TVP01, Rev. 2, Condition 28</p> | <p>Revise</p> | <p>The format requested provides additional clarity.</p> | <p>Replace with the language below:</p> <p>28. <u>NESHAP (40 C.F.R. 63) General Provisions.</u> <u>Affected facilities subject to a Federal Part 63 NESHAP are subject to the General Provisions outlined under Subpart A of the respective Federal regulation as follows:</u> <u>[18 AAC 50.040(j) & 50.326(j)]</u> <u>[40 C.F.R. 71.6(a)(1)]</u></p> <p><u>28.1 Triethylene Glycol (TEG) Dehydration Units Subject to Subpart HH.</u> <u>For EU IDs 4-10, 13-18, and 21-24, comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A described in Table 2 to Subpart HH.</u> <u>[40 C.F.R. 63.764 & Table 2, Subpart HH]</u> <u>[40 C.F.R. 63.1 - 63.15, Subpart A]</u></p> <p><u>28.2 RICE Subject to Subpart ZZZZ.</u> <u>For EU IDs 2, 12, and 19, comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A described in Table 8 to Subpart ZZZZ.</u> <u>[40 C.F.R. 63.6665 & Table 8, Subpart ZZZZ]</u> <u>[40 C.F.R. 63.1 - 63.15, Subpart A]</u></p> <p><u>28.3 Area Source Existing Gasoline Dispensing Facility Subject to Subpart CCCCCC.</u> <u>For EU ID 44, comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A described in Table 3 to Subpart CCCCCC.</u> <u>[40 C.F.R. 63.11130 & Table 3, Subpart CCCCCC]</u> <u>[40 C.F.R. 63.1 - 63.15, Subpart A]</u></p> |
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FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Conditions 28 and 29 (citations) | Revise | Corrects typographical errors. | Move citations of 63.774(a) and 63.775(a) that follow Condition 29 to instead be part of the citations that follow Condition 28 because they describe Subpart A requirements. Also, change “63,775(a)” to “63.775(a).” |
| AQ0942TVP01, Rev. 2, Condition 29 | Revise | Corrects typographical errors. | Please add a space between “40” and “CFR” and add “Subpart HH” to the citations. |
| AQ0942TVP01, Rev. 2, Condition 29.1 | Revise | Corrects formatting errors. | Please bold “Recordkeeping Requirements.” |
| AQ0942TVP01, Rev. 2, Footnote 6 | Revise | Add a reference to EU ID 43 to the 2 nd sentence of the footnote and correct a typographical error. | Revise Footnote 6 as follows: ⁶ ... EU IDs 3, 37, and 42, <u>and 43</u> are new affected sources under 40 CFR 63, Subpart ZZZZ . Per 40 CFR 63.6590(c), by complying with 40 CFR 60 Subparts IIII and Subpart JJJJ , they comply with 40 CFR 63, Subpart ZZZZ . |
| AQ0942TVP01, Rev. 2, Conditions 30, 31, 34.2, and 35.2 | Remove | Hilcorp is requesting to reclassify EU ID 2 as an emergency engine under Subpart ZZZZ . This requirement no longer applies. | Conditions 30, 31, 34.2, and 35.2. <i>Remove.</i> |
| AQ0942TVP01, Rev. 2, Conditions 32, 33.3, and 34.1 | Revise | Hilcorp is requesting to reclassify EU ID 2 as an emergency engine under Subpart ZZZZ . Update the condition to include EU ID 2. | Revise the condition to include EU ID 2. |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 32.1 | Revise | Hilcorp is requesting to reclassify EU IDs 2, 12 and 19 as emergency engines under Subpart ZZZZ. Revise the condition as indicated in order to address the emergency engine requirements applicable to EUs 2, 12 and 19 upon reclassification as emergency engines under Subpart ZZZZ. | Change the oil change frequency in Condition 32.1 from “1,000 hours” to “500 hours”. |
| AQ0942TVP01, Rev. 2, Condition 32.3 | Revise | Hilcorp is requesting to reclassify EU IDs 2, 12 and 19 as emergency engines under Subpart ZZZZ. Revise the condition as indicated in order to address the emergency engine requirements applicable to EUs 12 and 19 upon reclassification as emergency engines under Subpart ZZZZ. | Change the citation that follows Condition 32.3 as follows: [40 CFR 63, Subpart ZZZZ, 63.6603(a), (b), 63.6625(i) and Table 2d, Item 1 <u>Item 4, Subpart ZZZZ</u>] |
| AQ0942TVP01, Rev. 2, Condition 32.2 | Revise | Adds missing rule language. | Add the phrase “ <u>and replace as necessary.</u> ” to the end of the sentence. |
| AQ0942TVP01, Rev. 2, Condition 32.2b | Revise | Clarifies/corrects rule references. 63.6625(e)(3) specifically applies to emergency CI RICE. 63.6625(e)(4) applies to non-emergency CI RICE rated at less than or equal to 300 hp. With this application, we are reclassifying EU IDs 12 and 19 as emergency CI RICE. | Revise citation as shown below: [40 C.F.R. 63.6625(e)(3)(<u>3 & 4</u>), 63.6640(a) & Table 6, item 9, Subpart ZZZZ] |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 33.2 | Revise | Correct language for grammatical and typographical errors. | Correct the language as follows: “For EU IDs 2, 12, and 19, minimize the engine’s time spent at idle during startup and minimize the engine’s startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup <u>apply.</u> ” |
| AQ0942TVP01, Rev. 2, Condition 35.1 | Revise | Corrects the citation pertaining to the condition. | Revise the citation under Condition 35.1 as indicated below: [40 CFR <u>63.6640(e)</u> , 63.6650(f), <u>Subpart ZZZZ</u>] |
| AQ0942TVP01, Rev. 2, Condition 36 | Remove | All notifications are associated with 1) the initial compliance demonstration, which has already been completed; 2) engines using a CMS, or 3) engines using an alternative monitoring method. Furthermore, the requirement of Condition 28 to comply with 40 C.F.R. 63, Subpart A, encompasses the notification requirements outlined in Condition 36. | Condition 36. <i>Remove.</i> |
| AQ0942TVP01, Rev. 2, Conditions 38.2 and 38.3 | Remove | Halon is not used at Beluga River, therefore the requirements stated in Conditions 38.2 and 38.3 do not apply. | Conditions 38.2 and 38.3. <i>Remove.</i> |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 39 | Revise | The suggested language more closely matches the rule, and clarifies notification requirements not included in the current permit language. | <p>Replace Condition 39 language with the following:</p> <p><u>NESHAPs Applicability Determinations.</u> <u>The Permittee shall determine rule applicability and designation of affected sources under National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories (40 C.F.R. 63) in accordance with the procedures described in 40 C.F.R. 63.1(b). If a source becomes affected by an applicable subpart of 40 C.F.R. 63, the Permittee shall notify the Department and the Administrator as required by the applicable subpart and in accordance with 40 C.F.R. 63.9(b)(1) and 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).</u></p> <p style="text-align: center;">[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), 63.1(c)(5), 63.6(c)(1) & 63.9(b)(1), Subpart A]</p> |
| AQ0942TVP01, Rev. 2, Condition 44 | Revise | Standard permit condition revised after issuance of AQ0942TVP01 Rev. 2. | Update to Standard Permit Condition I.1. (Revised May 18, 2016) |
| AQ0942TVP01, Rev. 2, Condition 45 | Revise | Standard permit condition revised after issuance of AQ0942TVP01 Rev. 2. | Update to Standard Permit Condition I.2. (Revised May 18, 2016) |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 63 | Revise | Remove the requirement to submit copies of the reports based upon the September 1, 2014 policy and procedure (04.02.110) to remove obsolete obligations. Also, clarify the last sentence to clearly state that original reports may be submitted electronically. As written, it could be understood that the electronic submittal pertains to another copy of the same report. | Revise the condition as indicated: Submittals. Unless otherwise directed by the Department or this permit (<u>e.g., Condition 66 for operation reports</u>), the Permittee shall send an original <u>version</u> 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 <u>submit</u> data reports, emission -source test reports, or other records <u>electronically</u> under a cover letter certified in accordance with Condition 62. |
| AQ0942TVP01, Rev. 2, Condition 65.1c(i) | Revise | It is impossible to report a deviation until it is discovered. If a deviation is not discovered within 30 days of the end of the month that the deviation occurred, it is impossible to comply with the condition. | Add the phrase “or is discovered” after the word “occurred.” |
| AQ0942TVP01, Rev. 2, Condition 65.1c(iii) | Revise | Clarifies the permit deviation reporting requirement and associated deadlines. | Revise the condition as follows: (iii) <u>according to the required deadline</u> for failure to monitor, <u>as specified in Conditions 2.5, 5.2b, and 8.1b</u> as required in other applicable conditions of this permit. |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 66 | Revise | <p>Update the deadlines for submittal of the operating reports to coincide with the deadlines for reporting for other Hilcorp permits.</p> <p>Update the condition to reflect the intent to allow one of the two copies of the operating report to be submitted electronically.</p> | <p>Revise the condition as follows:</p> <p>Operating Reports. During the life of this permit, the Permittee shall submit to the Department an original and one copy of an operating report by August 15 <u>1</u> for the period January 1 to June 30 of the current year and by February 15 <u>1</u> for the period July 1 to December 31 of the previous year. <u>The copy of the operating report may be submitted electronically under a cover letter certified in accordance with Condition 62.</u></p> |
| AQ0942TVP01, Rev. 2, Condition 66, and subconditions | Revise | Standard permit condition revised after issuance of AQ0942TVP01 Rev. 2. | Update to Standard Permit Condition VII.1. (Revised May 18, 2016) |
| AQ0942TVP01, Rev. 2, Condition 66.4d (citation) | Revise | Update the citation to the correct reference for the standard operating permit condition that addresses operating reports. | Change the citation from “18 AAC 50.346(a)” to “18 AAC 50.346(b)(6).” |
| AQ0942TVP01, Rev. 2, Condition 67 | Revise | <p>Clarifies the number of required copies of compliance certification reports to be submitted. We ask that the Department remove the requirement to submit a copy of the annual compliance certification report based upon the September 1, 2014 policy and procedure (04.02.110) to remove obsolete obligations. Also, add a reference to Condition 63 to point the reader to additional information regarding report submittal, including the option to submit the report electronically.</p> | <p>Revise the condition as indicated and add a new footnote as shown:</p> <p>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 <u>according to Condition 63.</u></p> <p><New footnote> <u>A single copy of the signed certification must also be submitted to EPA, per Condition 67.2.</u></p> |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Condition 68 | Revise | Standard permit condition revised after issuance of AQ0942TVP01 Rev. 2. | Update to Standard Permit Condition XV.1. (Revised May 18, 2016) |
| AQ0942TVP01, Rev. 2, Condition 69.2 | Revise | <p>Although 40 CFR 60.13 and 63.10(d) and (f) discuss the fact that affected sources can obtain from EPA approval for various types of waivers, alternative requirements, and custom schedules, they do not pertain to the underlying requirement of this condition, which is to provide copies of said documents to the Department. These rules also do not include a requirement to keep a copy of said documents with the permit, which is another underlying requirement of the condition.</p> <p>In addition, 40 C.F.R. 60.13 specifically addresses the fact that affected sources can obtain from EPA approval for various types of waivers and alternative monitoring pertaining to CEMS operation and relative accuracy testing. However, there are no CEMS at the BRU, so the waivers and alternative monitoring provisions discussed in 40 C.F.R. 60.13 are not relevant to BRU.</p> <p>For these reasons, 40 C.F.R. 60.13 and 40 C.F.R. 63.10(d) and (f) should not be cited with the “NSPS and NESHAP Reports” condition.</p> | <p>Revise the citation following Condition 69.2 as follows:</p> <p>[40 C.F.R. 60.13, 63.10(d and f); & 71.6(c)(6)]</p> |
| AQ0942TVP01, Rev. 2, Condition 76.2c (citation) | Revise | Correct typographical error. | Change the citation from “326(j)” to “50.326(j).” |

FORM E3
Title V Condition Change Request

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| AQ0942TVP01, Rev. 2, Section 13 – Emission Inventory Form | Revise | Standard permit condition revised after issuance of AQ0942TVP01 Rev. 2. | Update to Standard Permit Condition XVI. (Revised May 18, 2016) |
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