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March 10, 2020

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

Subject:

Hilcorp Alaska, LLC - MPU L-Pad Facility Amendment to Title V Operating

Permit Application

Dear Application Intake,

On February 4, 2020, Hilcorp Alaska, LLC (Hilcorp) received a phone call from the Alaska Department of Environmental Conservation (ADEC) noting an error in the permit shield for 40 C.F.R. 60 Subpart OOOOa listed in the draft operating permit for the Milne Point Unit (MPU) L-Pad Facility. The public notice period for the permit has closed and it is currently under review by ADEC. Following conversations with Patrick Dunn and Scott Faber, Hilcorp respectfully requests ADEC reopen the application and incorporate the applicable Subpart OOOOa requirements. The appropriate E forms are attached.

Please contact Julieanna Potter at (907) 777-8444 or <u>jupotter@hilcorp.com</u> with any questions or concerns.

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,

David S. Wilkins Senior Vice President Hilcorp Alaska, LLC

Enclosure: MPU L-Pad Operating Permit Application Amendment – Forms E1 & E4

cc: Julieanna Potter, Hilcorp

Stationary Source-Wide Applicable Requirements

Stationary Source-Wide Applicable Requirements (attach additional sheets as needed):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.055(a)(1)	Insignificant Emissions Units Visible Emissions Standard	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from an industrial process, fuel-burning equipment, or an incinerator to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.	Yes	General MR&R For Insignificant Emission Units: a. The Permittee shall submit annual compliance certifications based on reasonable inquiry. b. The permittee shall comply with the requirements of the Air Pollution Prohibited condition. c. The Permittee shall report in the operating report if an emissions unit has historically been classified as insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and current actual emissions become greater than any of those thresholds; and d. No other monitoring, recordkeeping or reporting is required.

FORM E1Stationary Source-Wide Applicable Requirements

Permit					
and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	40 CFR 60.7(a) & 60.15(d), Subpart A	NSPS Subpart A Notification	For any affected facility or existing facility regulated under NSPS requirements in 40 C.F.R. 60, the Permittee shall furnish the Department and EPA written or electronic notification of: - the date that construction or reconstruction of an affected facility commences postmarked no later than 30 days after such date; - the actual date of initial startup of an affected facility postmarked within 15 days after such date; - any physical or operational change to an existing facility which may increase the emission rate of any air pollutant to which a standard applies unless that change is specifically exempted under an applicable subpart or in 40 C.F.R. 60.14(e), postmarked 60 days or as soon as practicable before the change is commenced - the date of a continuous monitoring system performance demonstration, postmarked not less than 30 days prior to such date; - any proposed replacement of an existing facility, for which the fixed capital cost of the new components exceeds 50 percent of the fixed capital cost that would be required to construct a comparable entirely new facility, postmarked as soon as practicable, but no less than 60 days before commencement of replacement	Yes	Annual Compliance Audit

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N/A	40 CFR 61, Subparts A & M, and Appendix A	Asbestos NESHAP	The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145, 61.150, and 61.152 of Subpart M, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.	Yes.	Annual Compliance Audit.
N/A	40 CFR 82, Subpart F, §82.154(a) – (n)	Subpart F: Refrigerant Recycling and Disposal	The Permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F.	Yes.	Annual Compliance Audit.
N/A	40 CFR 82, Subpart G, §82.174(b) – (d)	Subpart G – Significant New Alternatives Policy	The Permittee shall comply with the applicable prohibitions set out in 40 CFR 82.174 (Protection of Stratospheric Ozone Subpart G).	Yes.	Annual Compliance Audit.
N/A	40 CFR 82, Subpart H, §82.270(b) – (f)	Subpart H – Halon Emissions Reduction	The Permittee shall comply with the applicable prohibitions set out in 40 CFR 82.270 (Protection of Stratospheric Ozone Subpart H).	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	40 CFR 63.1(b) & 63.6(c)(1), Subpart A	NESHAPS Applicability Determinations	The Permittee shall determine rule applicability and designation of affected sources under National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories (40 C.F.R. 63) in accordance with the procedures described in 40 C.F.R. 63.1(b) and 63.10(b)(3). If a source becomes affected by an applicable subpart of 40 C.F.R. 63, the Permittee shall comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 C.F.R. 63.6(c).	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.345(a) & (e)	Standard Terms and Conditions	Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.345 (a) & (f)	Standard Terms and Conditions	The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.	Yes.	Annual Compliance Audit.

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N/A	18 AAC 50.345 (a) & (g)	Standard Terms and Conditions	The permit does not convey any property rights of any sort, nor any exclusive privilege.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.326(j), 50.400, 50.403, & 50.405	Administration Fees	The Permittee shall pay to the Department all assessed permit administration fees. Administration fee rates are set out in 18 AAC 50.400-403.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.410 & 50.420	Assessable Emissions	The Permittee shall pay to the Department an annual emission fee based on the stationary source's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410. The Department will assess fees per ton of each air pollutant that the stationary source emits or has the potential to emit in quantities greater than 10 tons per year.	Yes.	Annual Compliance Audit.

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N/A	18 AAC 50.410 & 50.420	Assessable Emission Estimates	Emission fees will be assessed as follows: No later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or If no estimate is submitted on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.045(a)	Dilution	The Permittee shall not dilute emissions with air to comply with this permit. Monitoring shall consist of an annual certification that the Permittee does not dilute emissions to comply with this permit.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.045(d)	Reasonable Precautions to Prevent Fugitive Dust	A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.055(g)	Stack Injection	The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a source constructed or modified after November 1, 1982, except as authorized by a construction permit, Title V permit, or air quality control permit issued before October 1, 2004.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance Keep records of: a. The date, time, and nature of all emissions complaints received, b. The name of the person or persons that complained, if known, c. A summary of any investigation using, including reasons the Permittee does or does not believe the emissions have caused a violation of this condition,
N/A	18 AAC 50.110	Air Pollution Prohibited	No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.	Yes.	d. Any corrective actions taken or planned for complaints attributable to emissions from the stationary source Report with each operating report a brief summary report including: a. The number of complaints received b. The number of times the Permittee or Department found corrective action necessary c. The number of times action was taken on a complaint within 24 hours d. The status of corrective actions that were not taken within 24 hours Notify the Department of a complaint attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee initiated corrective actions within 24 hours of receiving the complaint.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.235(a)	Technology- Based Emissions Standard	If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235(d), causes emissions in excess of a technology-based emission, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting requires information on the steps taken to minimize emissions.	Yes.	Report in accordance with the Excess Emissions reporting condition.
N/A	18 AAC 50.065	Open Burning Requirements	If the Permittee conducts open burning at this stationary source, the Permittee shall comply with the requirements of 18 AAC 50.065.	Yes.	Keep written records to demonstrate that the Permittee complies with the limitations in this condition and the requirements of 18 AAC 50.065. Upon request by the Department, submit copies of the records, and Include this condition in the annual compliance certification.
N/A	18 AAC 50.220(a)	Requested Source Tests	In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.220(b)	Operating Conditions	Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing at a point or points that characterize the actual discharge into the ambient air; and at the maximum rated burning or operating capacity of the emission unit or another rate determined by the Department to characterize the actual discharge into the ambient air.	Yes.	Annual Compliance Audit

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Condition Number	Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.220(c)(1)(A) – (F) & (c)(2)	Reference Test Methods	The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit.	Yes.	Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60. Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 61. Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. 63. Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9. Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A. Source testing for emissions of PM2.5 and PM10 must be conducted in accordance with the procedures specified in 40 C.F.R. 60, Appendix A. Source testing for emissions of PM2.5 and PM10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Methods 201 or 201A and 202.

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N/A	18 AAC 50.220(c)(3)	Excess Air Requirements	To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific emission unit type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.345(a)	Test Exemption	The Permittee is not required to comply with the Test Plans, Test Notification or Test Reports conditions when the exhaust is observed for visible emissions by Method 9 Plan.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.345(a) & (l)	Test Deadline Extension	The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.345(a) & (m)	Test Plans	Before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the emission unit will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be performed without resubmitting the plan.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.345(a) & (n)	Test Notification	At least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.345(a) & (o)	Test Reports	Within 60 days after completing a source test, the Permittee shall submit two copies of the results in the format set out in the Source Test Report Outline, adopted by reference in 18 AAC 50.030. The Permittee shall additionally certify the results in accordance with the Certification Condition. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.	Yes.	Annual Compliance Report.
N/A	18 AAC 50.220(f)	Particulate Matter Calculations	In source testing for compliance with the particulate matter standards, the three-hour average is determined using the average of three one-hour test runs.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.326(j), 40 CFR 60.7(f), Subpart A, 40 CFR 71.6(a)(3)(ii)(B)	Recordkeeping Requirements	The Permittee shall keep all records required by this permit for at least five years after the date of collection.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.345(a) & (j), 50.205, 50.326(j), 40 CFR 71.6(a)(3)(iii)(A)	Certification	The Permittee shall certify any permit application, report, affirmation, or compliance certification submitted to the Department and required under the permit by including the signature of a responsible official for the permitted stationary source following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal.	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.326(j), 40 CFR 71.6(a)(3)(iii)(A)	Submittals	Unless otherwise directed by the Department or this permit, the Permittee shall submit reports, compliance certifications, and other submittals required by this permit via the Department's Air Online Services (AOS) System at http://dec.alaska.gov/applications/air/airtoolsweb using the Permittee Portal option. Alternatively, the documents may be certified in accordance with the Certification Condition and submitted either by e-mail under a cover letter using	Yes.	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.345(a) & (i), 50.200, 50.326(a) & (j), 40 CFR 71.5(a)(2) & 71.6(a)(3)	Information Requests	The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the Federal Administrator.	Yes.	Annual Compliance Audit.

Permit and Condition	Applicable Requirement	Parameter/		Currently in	Monitoring, Recordkeeping and Reporting
Number	Citation ¹	Pollutant	Limit/Standard/ Requirement	Compliance?	Used to Determine Compliance
N/A	18 AAC 50.235(a)(2), 50.240(c), 50.326(j), & 50.346(b)(2) & (3)	Excess Emissions and Permit Deviation Reports	The Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit	Yes.	Report emissions that present a potential threat to human health or safety and excess emissions that the Permittee believes to be unavoidable as soon as possible after the event commences or is discovered. Report within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology-based emission standard, and Report all other excess emissions and permit deviations: a) Within 30 days after the end of the month during which the excess emissions or deviation occurred, b) If a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides permission to report under (a) above. c) For failure to monitor, as required in other applicable conditions of this permit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.346(a) & 50.326(j), 40 CFR 71.6(a)(3)(iii)(A)	Operating Reports	During the life of this permit, the Permittee shall submit to the Department an operating report by August 1 for the period January 1 through June 30 of the current year and by February 1 for the period July 1 through December 31 of the previous year.	Yes.	The operating report must include all information required to be in operating report by other conditions of this permit, for the period covered by the report. When excess emissions or permit deviations that occurred during the reporting period are not reported under the Excess Emissions and Permit Deviations condition above, identify the date of the deviation, the equipment involved, the permit condition affected, a description of the excess emissions or permit deviation, and any corrective action or preventative measures taken and the date of such actions. When excess emissions or permit deviations have already been reported under the Excess Emissions and Permit Deviations condition above, cite the date or dates of those reports.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.205, 50.345(a) & (j), 50.326(j), 40 CFR 71.6(c)(5)	Annual Compliance Certification	Each year by March 31, the Permittee shall compile and submit to the Department an annual compliance certification report.	Yes.	Certify the compliance status of the stationary source over the preceding calendar year consistent with the monitoring required by this permit. In addition submit a copy of the report directly to the US EPA Region X.
N/A	18 AAC 50.326(j)(4), 50.040(j), & 40 CFR 60.13, 63.10(d),(f), & 71.6(c)(6)	NSPS and NESHAP Reports	Reports. Attach to the operating report required by Condition 86 for the period covered by the report, a copy of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10 unless already submitted to the Department; and Waivers. Upon request by the Department, provide a copy of any EPA granted alternative monitoring requirement, custom monitoring schedule or waiver of the Federal emission standards, recordkeeping, monitoring, performance testing, or reporting requirements. The Permittee shall keep a copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule with the permit.	Yes.	Annual Compliance Audit.

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N/A	18 AAC 50.346(b)(8), 18 AAC 50.200, 40 CFR 51.15, 51.30(a)(1), (b)(1)	Emission Inventory Reporting	The Permittee shall submit to the Department reports of actual emissions, by emission unit, of CO, NH ₃ , NO _X , PM ₁₀ , PM _{2.5} , SO ₂ , VOCs, and Lead (Pb) (and lead compounds) every third year by April 30.	Yes.	Include in the report required by this condition, the required data elements contained within the forms contained in Tables 2a and 2b of Appendix A to Subpart A of 40 CFR 51 and the Emission Inventory Instructions available in Air Online Services (AOS) system for each emissions unit.
N/A	18 AAC 50.040(j)(7), 50.326(b), & 40 CFR 71.10(d)(1)	Permit Applications and Submittals	The Permittee shall comply with the following requirements for submitting application information to the EPA Region 10.	Yes.	 a) The Permittee shall provide a copy of each application for modification or renewal of this permit, including any compliance plan, or application addenda, at the time of the application or addendum is submitted to the Department; b) The information shall be submitted to the US EPA Region X. c) To the extent practicable, the Permittee shall provide to EPA applications in portable document format (pdf), MS Word format (.doc), or other computer-readable format compatible with EPA's national database management system and d) The Permittee shall maintain records as necessary to demonstrate compliance with this condition

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N/A	18 AAC 50.040(j)(4), 50.326(j), & 40 CFR 71.6(a)(8)	Emissions Trading	No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.	Yes.	Annual Compliance Audit.
N/A	18 AAC 50.040(j)(4) & 50.326(j)	Off Permit Changes	The Permittee may make changes that are not addressed or prohibited by this permit other than those subject to the requirements of 40 CFR Part 72 through 78 or those that are modifications under any provision of Title I of the Act to be made without a permit revision, provided that the following requirements are met: a) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; b) The change shall not qualify for the shield under 40 CFR 71.6(f)	Yes	Provide contemporaneous written notice to EPA and the Department of each such change, except for changes that qualify as insignificant under 18 AAC 50.326(d)-(i). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change. The Permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

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N/A	18 AAC 50.040(j)(4) & 50.326(j)	Operational Flexibility	The Permittee may make CAA Section 502(b)(10) changes within the permitted stationary source without requiring a permit revision if the changes are not modifications under any provision of Title I of the Act and the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions). The permit shield described in 40 CFR 71.6(f) shall not apply to any change made pursuant to this condition.	Yes	 a) The Permittee shall provide EPA and the Department with a written notification no less than seven days in advance of the proposed change. b) For each such change, the notification required by this condition shall include a brief description of the change within the permitted stationary source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
N/A	18 AAC 50.040(j)(3), 50.326(c) & (j)(2)	Permit Renewal	To renew this permit, the Permittee shall submit to the Department an application under 18 AAC 50.326 no sooner than 18 months before the expiration date of this permit and no later than 6 months before the expiration date of this permit. The renewal application	Yes	Annual Compliance Audit.

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N/A	18 AAC 50.326(j)(3) & 50.345(a) & (b)	General Compliance Requirements	Compliance with permit terms and conditions is considered to be compliance with those requirements that are a) Included and specifically identified in the permit, or b) Determined in writing in the permit to be inapplicable.	Yes	Advisory Condition
N/A	18 AAC 50.040(j), 50.326(j) & 50.345(a) & (c)	General Compliance Requirements	The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and, except for those terms or conditions designated in the permit as not federally enforceable, the Clean Air Act, and is grounds for: a) An enforcement action; b) Permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or c) Denial of an operating permit renewal application	Yes	Annual Compliance Audit
N/A	18 AAC 50.040(j) & 50.326(j)	General Compliance Requirements	For applicable requirements with which the stationary source is in compliance, the Permittee shall continue to comply with such requirements.	Yes	Annual Compliance Audit.

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Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
N/A	18 AAC 50.326(j)(3) & 50.345(a) & (d)	General Compliance Requirements	It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.	Yes	Advisory Condition
N/A	18 AAC 50.326(j)(3) & 50.345(a) & (h)	General Compliance Requirements	The Permittee shall allow the Department or an inspector authorized by the Department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to a) Enter upon the premises where a source subject to the permit is located or where records required by the permit are kept; b) Have access to and copy any records required by the permit; c) Inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit and d) Sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements	Yes	Annual Compliance Audit.
N/A	18 AAC 50.040(j) & 50.326(j)	Compliance Schedule	For applicable requirements that will become effective during the permit term, the Permittee shall meet such requirements on a timely basis.	Yes	Annual Compliance Audit.

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
New Condition	40 CFR 60.5370a(b)	Subpart OOOOa Good Air Pollution Control Practice	At all times, including periods of startup, shutdown, and malfunction, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.	Yes	Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.
New Condition	40 CFR 60.5397a(a)	Subpart OOOOa Fugitive Emissions Requirements	For purposes of this section, fugitive emissions are defined as: any visible emission from a fugitive emissions component¹ observed using optical gas imaging or an instrument reading of 500 ppm or greater using Method 21. ¹As defined under 40 CFR 60.5430a for fugitive emissions component.	Yes	Annual Compliance Audit
New Condition	40 CFR 60.5397a(b), (c), and (d)	Subpart OOO0a Fugitive Emissions Requirement s	Develop an emissions monitoring plan that covers the collection of fugitive emissions components at well sites ² at this facility in accordance with 40 CFR 60.5397a(c) and (d). ² As defined under 40 CFR 60.5430a for <i>well sites</i> .	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
New Condition	40 CFR 60.5397a(e), (f), (g)(1), 60.5415a(h)(1	Subpart OOOOa Fugitive Emissions Monitoring	Conduct monitoring surveys in accordance with the Fugitive Emissions Monitoring Plan. Subsequent Monitoring. Conduct subsequent monitoring surveys at well sites at least semiannually at each well site. Consecutive semiannual monitoring surveys must be conducted at least 4 months apart.	Yes	Annual Compliance Audit
New Condition	40 CFR 60.5397a(g) (3)	Subpart OOOOa Fugitive Emissions Monitoring	Fugitive emissions components that cannot be monitored without elevating the monitoring personnel more than 2 meters above the surface may be designated as difficult-to-monitor Fugitive emissions components that are designated difficult-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(3)(i) through (iv). Fugitive emissions components that cannot be monitored because monitoring personnel would be exposed to immediate danger while conducting a monitoring survey may be designated as unsafe-to-monitor. Fugitive emissions components that are designated unsafe-to-monitor must meet the specifications of 40 CFR 60.5397a(g)(4)(i) through (iv).	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
New Condition	40 CFR 60.5397a(h) (1), (2), 60.5415a(h)(2)	Subpart OOOOa Repair Requirements	Each identified source of fugitive emissions shall be repaired or replaced as soon as practicable, but no later than 30 calendar days after detection of the fugitive emissions. If the repair or replacement is technically infeasible, would require a vent blowdown, a well shutdown or well shut-in, or would be unsafe to repair during operation of the unit, the repair or replacement must be completed during the next scheduled well shutdown, well shut-in, after a planned vent blowdown, or within 2 years, whichever is earlier.	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

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Condition	Requirement	Parameter/		Currently in	Monitoring, Recordkeeping and Reporting
Number	Citation ¹	Pollutant	Limit/Standard/ Requirement	Compliance?	Used to Determine Compliance
New Condition	40 CFR 60.5397a(h) (3), 60.5415(h)(2) Supplementary Information	Subpart OOOOa Repair Requirements	Each repaired or replaced fugitive emissions component must be resurveyed as soon as practicable but no later than 30 days after being repaired, to ensure that there are no fugitive emissions. a) For repairs that cannot be made during the monitoring survey when the fugitive emissions are initially found, the operator may resurvey the repaired fugitive emissions components using either Method 21 or optical gas imaging. b) For each repair that cannot be made during the monitoring survey when the emissions are initially found, a digital photograph must be taken of that component or the component must be tagged for identification purposes. The digital photograph must include the date that the photograph was taken and must clearly identify the component by location within the site (e.g., the latitude and longitude of the component or by other descriptive landmarks visible in the picture).	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Continue d from Above	Continued from Above	Continued from Above	c) Operators that use Method 21 to resurvey the repaired fugitive emissions components are subject to following: (i) A fugitive emissions component is repaired with the Method 21 instrument indicates a concentration of less than 500 ppm above background or when no soap bubbles are observed when the alternative screening procedures specified in section 8.3. of Method 21 are used. (ii) Operators must use the Method 21 monitoring requirements specified in 40 CFR 60.5397a(c)(8)(ii) or the alternative screening procedures in Section 8.3.3 of Method 21.	Yes	Annual Compliance Audit

Permit and Condition	Applicable Requirement	Parameter/		Currently in	Monitoring, Recordkeeping and Reporting
Number	Citation ¹	Pollutant	Limit/Standard/ Requirement	Compliance?	Used to Determine Compliance
New Condition	40 CFR 60.5397a(i), 60.5420a(c)(15), 60.5415a(h)(3)	Subpart OOOOa Fugitive Emissions Recordkeeping	Maintain records of each monitoring survey including: - The fugitive emissions monitoring plan - Records for each monitoring survey including: - Date of survey - Beginning and ending times of survey - Name, training, and experience of operator(s) performing the survey Monitoring instrument used - When OGI is used to perform the survey, maintain records of one or more digital photographs or videos captured from the OGI instrument of each required monitoring survey. The digital photograph must include the date the photograph was taken and the latitude and longitude imbedded within or stored with the digital file. As an alternative to imbedded latitude and longitude within the digital file, the digital photograph or video may consist of an image of the monitoring survey being performed with a separately operating GPS device within the same digital picture or video, provided the latitude and longitude output of the GPS unit can be clearly read in the digital image Fugitive emissions component identification when Method 21 is used Ambient temperature, sky conditions, and maximum wind speed at the time of the survey, - Any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan.	Yes	Annual Compliance Audit

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Continued from Above	Continued from Above	Continued from Above	- Documentation of each fugitive emission including: O location, O any deviations from the monitoring plan or a statement that there were no deviations from the monitoring plan O number and types of components for which fugitive emissions were detected, O number and type of difficult-to-monitor and unsafe- to-monitor fugitive emissions components monitored, O instrument reading of each fugitive emissions component that requires repair when Method 21 is used O number and type of fugitive emissions components that were not repaired as required number and type of components that were tagged as a result of not being repaired during the monitoring survey when the fugitive emissions were initially found	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Continued from Above	Continued from Above	Continued from Above	 if a fugitive emissions component is not tagged, a digital photograph or video of each fugitive emissions component that could not be repaired during the monitoring survey when the fugitive emissions were initially found. The digital photograph or video must clearly identify the location of the component that must be repaired. repair methods applied in each attempt to repair the fugitive emissions components number and type of fugitive emissions components placed on delay of repair and explanation for each delay of repair date of successful repair of the fugitive emissions component instrumentation used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding. 	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition	Applicable Requirement	Parameter/		Currently in	Monitoring, Recordkeeping and Reporting
Number	Citation ¹	Pollutant	Limit/Standard/ Requirement	Compliance?	Used to Determine Compliance
New Condition	40 CFR 60.5397a(j), 60.5420(b)(1) and (7), 60.5415a(h)(4)	Subpart OOOOa Fugitive Emissions Reporting	Submit reports for collections of fugitive emissions components at well sites as follows: Subsequent Reporting. Subsequent annual reports must be submitted no later than the same date each year as the initial annual report. The Permittee may arrance with the Administrator a common schedule on which reports may be submitted as long as the schedule does not extend the reporting period. Reports should include: a) The general information specified in 40 CFR 60.5420a(b)(1)(i). b) An identification of each affected facility being included in the report. c) Beginning and ending dates of the reporting period. d) A certification by a certifying official of truth, accuracy, and completeness. This certification shall state, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Continued from Above	Continued from Above	Continued from Above	a) Records of each monitoring survey including: i. Date of the survey ii. Beginning and ending time of the survey iii. Name of operator(s) performing the survey. If the survey is performed using OGI, the training and experience of the operator. iv. Ambient temperature, sky conditions, and maximum wind speed at the time of the survey. v. Monitoring instrument used. vi. Any deviations from the monitoring plan, or a statement that there were no deviations from the plan. vii. Number and type of components for which fugitive emissions were detected. Number and type of components that were not repaired as required,	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Continued from Above	Continued from Above	Continued from Above	ix. Number and type of difficult-to-monitor and unsafe-to-monitor fugitive emission components monitored. x. The date of successful repair of the fugitive emissions component xi. Number and type of fugitive emission components placed on delay of repair and explanation for each delay of repair. xii. Type of instrument used to resurvey a repaired fugitive emissions component that could not be repaired during the initial fugitive emissions finding.	Yes	Annual Compliance Audit

FORM E1Stationary Source-Wide Applicable Requirements

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
New Condition	40 CFR 60.5420(b) (11). 40 CFR 60.4	Subpart OOOOa Reporting	Submit all reports to the EPA via the CEDRI, accessible through EPA's CDX (https://cdx.epa.gov/). Use the appropriate electronic report in CEDRI or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI website. If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, submit the report to the EPA Region X address at 1600 Sixth Avenue, Seattle, WA, 98101. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI.	Yes	Annual Compliance Audit
New Condition	40 CFR 60.5365a	Subpart OOOOa Hydraulic Fracturing and Refracturing Applicabilit y	At a well affected facility, if hydraulic fracturing or refracturing occurs, comply with applicable sections under 40 CFR 60 Subpart OOOOa.	Yes.	Annual Compliance Audit.

¹ Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]

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Permit Number: AQ1527TVP01

Non-applicable requirements (attach additional sheets as needed):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 C.F.R. 60 Subpart J, Ja, GGG, GGGa, QQQ	Stationary source does not meet the definition for a petroleum refinery.
40 C.F.R. 60 Subpart KKK	Stationary source is not a natural gas processing plant as defined in subpart.
40 C.F.R. 60 Subpart LLL	Stationary source does not operate natural gas sweetening unit(s).
40 C.F.R. 60 Subpart OOOO	Stationary source does not contain onshore affected facilities that commenced construction after August 23, 2011, and on or before September 18, 2015
40 C.F.R. 60 Subpart E, Ea, Eb, Ec, F, G, Ga, H, I, L, M, N, Na, O, P, Q, R, S, T, U, V, W, X, Y, Z, AA, AAa, BB, CC, DD, EE, HH, KK, LL, MM, NN, PP, QQ, RR, SS, TT, UU, VV, VVa, WW XX, AAA, BBB, DDD, FFF, HHH, III, JJJ, NNN, OOO, PPP, RRR, SSS, TTT, UUU, VVV, WWW, AAAA, CCCC, DDDD, EEEE, LLLL	No affected facility.
40 C.F.R. 61 Subpart J	No process components in benzene service, as defined by subpart (10% benzene by weight).
40 C.F.R. 61 Subpart M: §61.142	Stationary source is not an Asbestos Mill.
40 C.F.R. 61 Subpart M: §61.143	Stationary source roadways not exposed to asbestos tailings or asbestos containing waste.
40 C.F.R. 61 Subpart M: §61.144	Stationary source does not engage in any manufacturing operations using commercial asbestos.
40 C.F.R. 61 Subpart M: §61.146	Stationary source does not spray apply asbestos containing materials.
40 C.F.R. 61 Subpart M: §61.147	Stationary source does not engage in any fabricating operations using commercial asbestos.
40 C.F.R. 61 Subpart M: §61.148	Stationary source does not install or reinstall, on any stationary source component, insulation material containing commercial asbestos.
40 C.F.R. 61 Subpart M: §61.149	Applies to only those facilities subject to 61.142.
40 C.F.R. 61 Subpart M: §61.151	Applies only to those facilities subject to 61.142, 61.144, or 61.147.
40 C.F.R. 61 Subpart M: §61.152	Stationary source does not use air cleaning equipment.

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40 C.F.R. 61 Subpart M: §61.153	No reporting requirements apply for sources subject to 61.145.
40 C.F.R. 61 Subpart M: §61.154	Stationary source is not an active waste disposal site and does not receive asbestos containing waste material.
40 C.F.R. 61 Subpart M: §61.155	Stationary source does not process regulated asbestos containing material (RACM).
40 C.F.R. 61 Subpart V	Stationary source does not operate equipment in volatile hazardous air pollutant (VHAP) service, as defined by subpart (> or = 10% VHAP by weight).
40 C.F.R. 61 Subpart Y	Stationary source does not operate storage vessels in benzene service.
40 C.F.R. 61 Subpart BB	Stationary source does not conduct benzene transfer operations.
40 C.F.R. 61 Subpart FF	Stationary source does not benzene waste operations.
40 C.F.R. 61 Subpart B, C, D, E, F, H, I, K, L, N, O, P, Q, R, T, W	No affected facility.
40 C.F.R. 63, Subpart B	Stationary source is not a major source of HAPs.
40 C.F.R. 63 Subpart T	Stationary source does not operate halogenated solvent cleaning machines.
40 C.F.R. 63 Subpart CC, UUU	Stationary source does not meet the definition for a petroleum refinery.
40 C.F.R. 63 Subpart VV	Provisions only apply to oil-water separators and organic-water separators affected by 40 C.F.R. 60, 61, or 63 that specifically reference 40 C.F.R. 63 Subpart VV.
40 C.F.R. 63 Subpart HH	Area sources and stationary source are exempt from the subpart because it exclusively processes, store, or transfers "black oil" and stationary source is not a major source of HAPS.
40 C.F.R. 63 Subpart EEEE	Stationary source is not a major source of HAPs and does not distribute organic liquids.
40 C.F.R. 63 Subpart HHH	Stationary source does not transmit or store natural gas prior to entering the pipeline to a local distribution company or to a final end user and stationary source is not a major source of HAPS.

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40 C.F.R. 63 Subpart B, F, G, H, I, J, L, M, N, O, Q, R, S, U, W, X, Y, AA, BB, DD, EE, GG, II, JJ, KK, LL, MM, OO, PP, QQ, RR, SS, TT, UU, WW, XX, YY, CCC, DDD, EEE, GGG, III, JJJ, LLL, MMM, NNN, OOO, PPP, QQQ, RRR, TTT, UUU, VVV, XXX, AAAA, CCCC, DDDD, FFFF, GGGG, HHHH, IIII, JJJJ, KKKK, MMMM, NNNN, OOOO, PPPP, QQQQ, RRRR, SSSS, TTTT, UUUU, VVVV, WWWW, XXXX, AAAAA, BBBBB, CCCCC, EEEEE, FFFFF, GGGGG, HHHHH, IIII, JJJJJ, KKKKK, LLLLL, MMMMM, NNNNN, PPPPP, QQQQQ, RRRRR, SSSSS, TTTTT, UUUUU, WWWWW, YYYYY, ZZZZZ, BBBBBB, DDDDDD, EEEEEE, FFFFFF, GGGGGG, HHHHHH, LLLLLL, MMMMMM, NNNNN, OOOOOO, PPPPPP, QQQQQQ, RRRRRR, SSSSS, TTTTTT, VVVVVV, WWWWWW, XXXXXX, YYYYYY, ZZZZZZ, AAAAAAA, BBBBBBBB, CCCCCCC, DDDDDDD, EEEEEEE, HHHHHHHH	No affected facility.
40 CFR 64 – Compliance Assurance Monitoring	No pollutant-specific emission unit uses a control device to achieve compliance with any emission limitation or standard that was proposed by the Administrator before November 15, 1990. The stationary source is exempted from CAM associated with any rule that was proposed under CAA 111 and 112 by the Administrator after November 15, 1990, as specified in 40 CFR 64.2(b)(1)(i).
40 C.F.R. 68 – Risk Management Programs	Naturally occurring hydrocarbon mixtures: (crude oil, condensate, natural gas and produced water) prior to entry into a petroleum refining process unit (NAICS code 32411) or a natural gas processing plant (NAICS code 211112) are exempt from the threshold determination. (see final Rule exempting from threshold determination regulated flammable substances in naturally occurring hydrocarbons mixtures prior to initial processing, 63 FR 640 [January 6, 1998]). Less than 10,000 lb of other mixtures containing regulated flammable substances that meet the criteria for an NFPA rating of 4 for flammability are stored at the stationary source. Therefore, CFP, B-Pad, and E-Pad, a crude petroleum and natural gas production stationary source, (NAICS code 211111) does not process or store regulated flammable or toxic substances in excess of threshold quantities.
40 C.F.R. 82 Subpart A: §82.1	Stationary source does not produce, transform destroy, import or export Class I or Group I or II substances or products.
40 C.F.R. 82 Subpart B: §82.30	Stationary source does not service motor vehicles air conditioners.

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40 C.F.R. 82 Subpart C: §82.60	Stationary source is not the ultimate consumer and not a manufacturer or distributor of Class I or II products or substances.	
40 C.F.R. 82 Subpart D: §82.80	Subpart applies only to Federal departments, agencies, and instrumentalities.	
40 C.F.R. 82 Subpart E: §82.100	Stationary source is not the ultimate consumer and not a manufacturer or distributor of Class I and II products or substances.	
40 C.F.R. 82 Subpart F: §82.158	Stationary sources does not manufacture or import recovery and recycling equipment.	
40 C.F.R. 82 Subpart F: §82.160	Stationary source does not contract equipment testing organization to certify recovery and recycling equipment.	
40 C.F.R. 82 Subpart F: §82.164	Stationary source does not sell reclaimed refrigerant.	
40 C.F.R. 82 Subpart F: Appendix C	Stationary source is not a third party entity that certifies recovery equipment.	
40 C.F.R. 82 Subpart F: Appendix D	Stationary source does not have technician certification program.	
40 C.F.R. 82 Subpart G: §82.174 (a)	Stationary source does not manufacture substitute chemicals or products for ozone-depleting compounds.	
40 C.F.R. 82 Subpart H: §82.270 (a)	Stationary source does not manufacture halon.	
40 C.F.R. 82 Subpart I: §82.304	Stationary source does not sell or distribute any identified banned products.	
18 AAC 50.055(a)(2) through (9) 18 AAC 50.055(b)(2) through (6) 18 AAC 50.075	No affected emission units within the permitted stationary source.	
18 AAC 50.060 and 50.070	Not an affected emission unit, operation, or industry.	
18 AAC 50.085 and 50.090	Regulations only apply to facilities within the Port of Anchorage.	
Non-Road Engines		
18 AAC 50.055	The limits of 18 AAC 50.055 do not apply to non-road engines. Non-road (mobile) internal combustion engines are not included in the definition of fuel-burning equipment under 18 AAC 50.990.	
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Citations must be specific. Include sub-paragraph level detail [e.g. 18 AAC 50.055(a)(1), or 40 C.F.R. 60.332(a)(2).]