DEPARTMENT OF ENVIRONMENTAL CONSERVATION
OWNER REQUESTED LIMIT

Owner Requested Limit: AQ1328ORL01 **Draft Date – April 29, 2024**
Rescinds PAEL: AQ1328PL201

Owner:	**Mustang Holding, LLC** **301 Calista Ct., Suite 103** **Anchorage, AK 99518**
Stationary Source:	**Mustang Pad**
Location:	Latitude: 70° 14' 55.96" North; Longitude: 150° 17' 3.53" West
Project:	Mustang Project
ORL Contact:	Dan Gleason, (907) 980-1958, dgleason@finnexllc.com

The above-named owner/operator has submitted a complete request for an owner requested limit (ORL) under 18 AAC 50.225(b) for the Mustang Pad. The Alaska Department of Environmental Conservation (Department) approves the ORL to restrict the stationary source's potential emissions increases from an existing stationary source. The ORL allows Mustang Holding, LLC to avoid the requirements for a Title I Minor Permit under 18 AAC 50.502(c)(4), a Title V Operating Permit under 18 AAC 50.326, and a Title I HAP Construction Permit for formaldehyde under 18 AAC 50.316. The Department certifies that the ORL is effective as of the date noted below. Upon effective date of this AQ1328ORL01, the Pre-Approved Emissions Limit (PAEL) No. AQ1328PL201 issued for the Mustang Pad shall be rescinded.

In accordance with 18 AAC 50.225(f), the owner/operator has agreed to the conditions listed in this ORL.

The owner/operator may revise the terms or conditions of this approval under 18 AAC 50.225 (h)(1) by submitting a request under 18 AAC 50.225(b). The owner/operator may request the Department revoke the limit in accordance with 18 AAC 50.225(h)(2). This limit remains in effect until the Department approves a new limit or revokes it.

I understand and agree to the terms and conditions of this approval.

_____ _____
Owner or Operator **Printed Name**

_____
Title

Department approval:

_____ _____
James R. Plosay, Program Manager **Owner Requested Limit Effective Date**
Air Permits Program

CONDITIONS:

1. **ORLs to Avoid Title I Minor Permit under 18 AAC 50.502(c)(4).** To avoid the requirement to obtain a Title I Minor Permit under 18 AAC 50.502(c)(4), the owner/operator shall limit the stationary source's potential emissions in any consecutive 12-month period to below the following thresholds: for Nitrogen Dioxides (NO_x), 40 TPY; particulate matter less than 10 microns in diameter (PM_{10}), 15 TPY; and particulate matter less than 2.5 microns in diameter ($PM_{2.5}$), 10 TPY.

   1.1 The owner/operator shall comply with the operational limits and associated monitoring, recordkeeping, and reporting requirements under Conditions 3 and 4.

2. **ORLs to Avoid Title V Permit Under 18 AAC 50.326 and Title I HAP Construction Permit under 18 AAC 50.316.** To avoid the requirement to obtain a Title V operating permit under 18 AAC 50.326 and a Title I HAP construction permit under 18 AAC 50.316, the owner/operator shall limit the stationary source's potential emissions in any consecutive 12-month period to below the following thresholds: for Carbon Monoxide (CO), 100 TPY; Volatile Organic Compounds (VOC), 100 TPY; and a single HAP (Formaldehyde), 10 TPY.

   2.1 The owner/operator shall comply with the operational limits and associated monitoring, recordkeeping, and reporting requirements under Conditions 3 through 5.

3. **Flare Limit.** To ensure compliance with the ORLs in Conditions 1 and 2, the owner/operator shall limit the amount of upset flaring in EU ID 6 to no more than 100 million standard cubic feet per year.

   3.1 For EU ID 6, install, maintain, and operate a fuel flow meter capable of recording the total amount of flared upset gas, accurate to within ±5 percent.

   3.2 Monitor and record the monthly volume of flared upset gas for EU ID 6, as follows:

      a. Before the end of each calendar month, calculate and record,

         (i) the total volume of upset gas flared in EU IDs 6 for the previous month; and

         (ii) the 12-consecutive-month total volume of upset gas flared in EU ID 6, by adding the previous 12 monthly total volume of flared upset gas.

   3.3 For each month of the reporting period in the annual operating report required in Condition 7, include:

      a. the total volume of upset gas flared in EU ID 6 for the rolling 12 consecutive-month period, as calculated under Condition 3.2a(ii).

   3.4 Report as excess emissions and/or permit deviation in accordance with Condition 8 if the limit in Condition 3 is exceeded, or if any of the requirements in Conditions 3.1 through 3.3 are not met.

4. Engine Hour Limits. To ensure compliance with the ORLs in Conditions 1 and 2, the owner/operator shall limit the hours of operation of the following EUs per consecutive 12-month period, as follows: for EU IDs 8 and 9, limit to no more than 1,500 hours, combined; and for EU IDs 10 and 11, limit to no more than 1,500 hours, combined.

4.1 For each of EU IDs 8, 9, 10, and 11, install, maintain, and operate a non-resettable hour meter.

4.2 Monitor and record the monthly hours of operations for each of EU IDs 8, 9, 10, and 11, as follows:

a. Before the end of each calendar month, calculate and record,

(i) the combined total hours of operation of EU IDs 8 and 9 for the previous month;

(ii) the combined total hours of operation of EU IDs 10 and 11 for the previous month;

(iii) the 12-consecutive-month combined total hours of operation of EU IDs 8 and 9, by adding the previous 12 monthly combined hours of operation; and

(iv) the 12-consecutive-month combined total hours of operation of EU IDs 10 and 11, by adding the previous 12 monthly combined hours of operation.

4.3 For each month of the reporting period in the annual operating report required in Condition 7, include:

a. the combined total hours of operation of EU IDs 8 and 9 for the rolling 12-consecutive-month period, as calculated under Condition 4.2a(iii); and

b. the combined total hours of operation for EU IDs 10 and 11 for the rolling 12-consecutive-month period, as calculated under Condition 4.2a(iv).

4.4 Report as excess emissions and/or permit deviation in accordance with Condition 8 if the limits under Condition 4 are exceeded, or if any of the requirements in Conditions 4.1 through 4.3 are not met.

5. Catalyst and Flare Operation. To ensure compliance with the ORLs in Condition 2, the owner/operator shall monitor, record and report, as follows:

5.1 For each of EU IDs 1 and 2, install a selective catalytic oxidation system.

a. Install, maintain, and operate, a non-resettable hour meter on each EU.

b. Monitor and record the inlet temperature of the catalyst system on each EU on a daily basis.

c. Remove and replace the selective oxidation catalyst system for each EU that exceeded 25,000 hours of operation from its last catalyst replacement.

d. Record the hours on each selective oxidation catalyst system for each EU at replacement.

5.2 Operate EU ID 6 at all times that the glycol dehydration system is operating, to control emissions from EU ID 5.

5.3 Record the date, time, and duration of any instance in which the flare pilot or flare system are deemed inoperable.

5.4 Include in the annual operating report in accordance with Condition 7:

a. the hours on each oxidation catalyst for EU IDs 1 and 2 at replacement recorded under Condition 5.1d. If a catalyst was not replaced during the reporting period, include in the report the total operating hours of each EU from the date and time operation began to the date before the report is submitted; and

b. the hours in which EU ID 6 was inoperable, as recorded under Condition 5.3.

5.5 Report as excess emissions and/or permit deviation in accordance with Condition 8 if the glycol dehydration system was operating while EU ID 6 was inoperable, or if any of the requirements in Conditions 5.1 through 5.4 are not met.

6. Recordkeeping Requirements. Unless otherwise specified in this authorization, keep all records required by this ORL for at least five years from the date of collection.

7. Annual Operating Reports. Submit one certified copy, of an **annual operating report** for the stationary source to the Department, in accordance with the submission instructions on the Department's Standard Permit Conditions web page https://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/ by February 1 for the preceding calendar year. Certify the report as specified in 18 AAC 50.205 by having the responsible official sign after the following 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."* Attach copies of all excess emission and deviation forms submitted to Department during the reporting period pursuant to Condition 8.

8. Excess Emissions and Deviation Reports. Report excess emissions and deviations as follows:

8.1 **Excess Emissions Reporting**. Report all emissions or operations that exceed emissions limits of this ORL as follows:

a. In accordance with 18 AAC 50.240(c), as soon as possible report:

(i) excess emissions that present a potential threat to human health or safety; and

(ii) excess emissions believed to be unavoidable.

b. If a continuous or recurring excess emission is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 8.1c.

c. Report all other excess emissions not described in Conditions 8.1a and 8.1b within 30 days after the end of the month during which the excess emissions occurred or as part of the next annual operating report in Condition 7, whichever is sooner.

d. If requested by the Department, provide a more detailed written report as requested to follow up an excess emissions report.

8.2 **Deviations Reporting.** For deviations that are not "excess emissions," as defined in 18 AAC 50.990, report within 30 days after the end of the month during which the deviation occurred or as part of the next annual operating report in Condition 7, whichever is sooner.

8.3 **Reporting Instructions.** When reporting either excess emissions or deviations, the Permittee shall report using the Department's online form for all such submittals, beginning no later than September 7, 2023. The form can be found at the Division of Air Quality's Air Online Services (AOS) system webpage http://dec.alaska.gov/applications/air/airtoolsweb using the Permittee Portal option. Alternatively, upon written Department approval, the Permittee may submit the form contained in Attachment A to this permit. The Permittee must provide all information called for by the form that is used. Submit the report in accordance with the submission instructions on the Department's Standard Permit Conditions webpage found at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/

Statement of Avoided Requirement:

The Mustang Pad is an existing stationary source engaged in producing liquid hydrocarbons from oil and gas field gases (SIC 1321) consisting of four diesel-fired generators, which has been operating under PAEL AQ1328PL201. On February 23, 2024, the Department received an application for proposed emissions units associated with a limited production facility at the pad. The project will entail two fuel gas-fired generator engines, one inlet gas heater, one interstage heater, one glycol dehydration system, and a process flare.

The system is designed with an absorber contact tower with six stages, a glycol circulation flow rate of 3 gallons per minute (gpm), a flash tank with uncontrolled emissions used as a stripping gas, and a regenerator that uses an electric heating element to regenerate the glycol for use.

The existing four diesel-fired generators (EU IDs 8 through 11) will be retained under this ORL. However, once electrical power from EU IDs 1 and 2 becomes available, the camp diesel-fired engines will no longer provide primary electrical power to the camp.

Consistent with the definition of "potential to emit" listed in AS 46.14.990(22), the stationary source's potential emissions increases are verifiable through the monitoring, recordkeeping, and reporting contained in this approval. By installing a catalytic oxidation system on EU IDs 1 and 2, operating the flare (EU ID 6) at all times while the glycol dehydration system is in operation, limiting the amount of gas flared by EU ID 6 during upsets to no more than 100 MMscf/yr, and limiting the operational hours of EU IDs 8 and 9 and EU IDs 10 and 11 to no more than 1500 hours for each grouped EUs, the owner/operator is avoiding the requirements to obtain the following:

- Title I minor permit under 18 AAC 50.502(c)(4) for NO_x, PM_{10}, and $PM_{2.5}$;
- Title I HAP construction permit under 18 AAC 50.316 for formaldehyde; and
- Title V operating permit under 18 AAC 50.326 for CO, VOC, and HAP (formaldehyde).

Without the ORLs, the PSD major classification threshold of 250 TPY each for CO and VOC would be exceeded (see Table 4). Therefore, an ORL is required for these pollutants to avoid PSD major classification. Since thresholds are different for each permit type, the ORLs imposed are based on the most stringent thresholds that will allow the stationary source to avoid all permitting obligations. For example, for CO and VOC, the threshold of 100 TPY each for Title V major classification was used as basis for the ORL. Therefore, the ORL for avoidance of a Title V permit under 18 AAC 50.326 eliminates the need for an ORL for avoidance of PSD major classification under 18 AAC 50.306(a). In the same manner, a NO_x ORL for Title V permit avoidance is not necessary in this case because the more stringent 40-TPY NO_x threshold for Title I minor permit avoidance under 18 AAC 50.502(c)(4) applies.

Table 1 shows the EUs that are subject to ORL authorization AQ1328ORL01, provided in the application. Table 2 shows the existing EU IDs 8 through 11 operating under AQ1328PL201. The Department verified the stationary source's potential emissions increases with the additions of EU IDs 1 through 7 and the requested ORLs, shown in Table 3. In addition, the net change in potential emissions without any of the ORLs is given in Table 4, showing that the applicable thresholds for PSD, Title I, and Title V permitting would be exceeded.

Table 1 – EU Inventory at Mustang Pad

EU ID	Unit Description	Make/Model	Fuel Type	Rating/Size
1	Generator 1	Caterpillar / G3520C	CNG[1]/ Fuel Gas	2,889 bhp
2	Generator 2	Caterpillar / G3520C	CNG[1]/ Fuel Gas	2,889 bhp
3	Inlet Heater	TBD	Fuel Gas	2.5 MMBtu/hr
4	Gas Dehydration Reboiler Heater	TBD	Fuel Gas	1.0 MMBtu/hr
5	Glycol Dehydration Process Vents	TBD	NA	6 MMscf/day
6	Flare	TBD	Fuel Gas	10 MMscf/day
7	Flare - Pilot and Purge Gas	TBD	Fuel Gas	0.2 MMscf/day
8	Camp Generator 1	Caterpillar / C15	ULSD	455 ekW
9	Camp Generator 2	Caterpillar / C15	ULSD	455 ekW
10	Camp Generator 3	Caterpillar / C9	ULSD	334 ekW
11	Camp Generator 4	Caterpillar / C9	ULSD	334 ekW

Notes:
1 Compressed Natural Gas is abbreviated as “CNG”.

Table 2 presents the existing stationary source's PTE, along with the operational hour limits derived from the 39.9 TPY NO_x limit in PAEL AQ1328PL201. Under PAEL AQ1328PL201, the source may operate all emission units under a fuel consumption limit of 132,000 gallons per 12-month period.

Table 2 – Existing Stationary Source PTE Operating Under AQ1328PL201, in Tons per Year (TPY)

EU ID	Unit ID/ Description	Max. Rating or Capacity	Potential Operation/Fuel Consumption	NO_x		CO		VOC		PM/PM-10/PM-2.5		SO_2	
				EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)
8	Camp Generator 1	455 ekW	5,250 hrs/yr	3.5 g/kW-hr	9.20	3.5 g/kW-hr	9.20	0.4 g/kW-hr	1.05	0.1 g/kW-hr	0.26	2.1E-04 lb/gal	0.02
9	Camp Generator 2	455 ekW	5,250 hrs/yr		9.20		9.20		1.05		026		0.02
10	Camp Generator 3	334 ekW	5,500 hrs/yr	3.96 g/hp-hr	10.73	0.59 g/hp-hr	1.60	0.18 g/hp-hr	0.49	0.30 g/hp-hr	0.81	2.1E-04 lb/gal	0.01
11	Camp Generator 4	334 ekW	5,500 hrs/yr		10.73		1.60		0.49		0.81		0.01
Existing Stationary Source Total:					**39.86**		**21.59**		**2.03**		**2.17**		**0.06**

Table 3 presents details of the EUs, their characteristics, and emissions, as verified by the Department. Potential emissions are estimated using maximum annual operation for all fuel burning equipment as defined in 18 AAC 50.990(39) subject to any operating limits. As shown below, the potential emissions increases will not exceed the minor permitting thresholds under 18 AAC 50.502(c)(4).

Table 3 – Restricted PTE of Existing (EU IDs 8 through 11) and New EUs (EU IDs 1 through 7), in Tons per Year (TPY) Subject to ORL Authorization AQ1328ORL01

EU ID	Unit ID/ Description	Max. Rating or Capacity	Potential Operation/Fuel Consumption	NO_x		CO		VOC		PM/PM-10/PM-2.5		SO_2	
				EF[2]	PTE[1](tpy)	EF[2]	PTE[1](tpy)	EF[2]	PTE[1] (tpy)	EF[3]	PTE[1] (tpy)	EF[4]	PTE[1] (tpy)
1	Generator 1	2,889 bhp	8,760 hrs/yr	0.50 g/bhp-hr	13.92	2.14 g/bhp-hr	32.77[5]	0.73 g/bhp-hr	11.18[4]	0.02 lb/MMBtu	1.71	16.8 lb/MMscf	1.56
2	Generator 2	2889 bhp	8,760 hrs/yr	0.50 g/bhp-hr	13.92	2.14 g/bhp-hr	32.77[5]	0.73 g/bhp-hr	11.18[4]	0.02 lb/MMBtu	1.71	16.8 lb/MMscf	1.56
3	Inlet Heater	2.5 MMBtu/hr	8,760 hrs/yr	2.2 lb/MMscf	0.02	84 lb/MMscf	0.88	5.5 lb/MMscf	0.06	7.6 lb/MMscf	0.08	16.8 lb/MMscf	0.18
4	Gas Dehydration Reboiler Heater	1.0 MMBtu/hr	8,760 hrs/yr	2.2 lb/MMscf	0.009	84 lb/MMscf	0.35	5.5 lb/MMscf	0.02	7.6 lb/MMscf	0.03	16.8 lb/MMscf	0.07

EU ID	Unit ID/ Description	Max. Rating or Capacity	Potential Operation/Fuel Consumption	NO_x		CO		VOC		PM/PM-10/PM-2.5		SO_2	
				EF[2]	PTE[1](tpy)	EF[2]	PTE[1](tpy)	EF[2]	PTE[1] (tpy)	EF[3]	PTE[1] (tpy)	EF[4]	PTE[1] (tpy)
5	Glycol Dehydration Process Vents	6 MMscf/day	8,760 hrs/yr	NA	0	NA	0	103.717 tpy	2.07[6]	NA	0	NA	0
6	Flare	10 MMscf/day	100 MMscf/yr	0.068 lb/MMBtu	3.57	0.31 lb/MMBtu	16.28	0.66 lb/MMBtu	34.65	40 µg/L	1.14	16.8 lb/MMscf	0.84
7	Flare - Pilot and Purge Gas	0.2 MMscf/day	8,760 hrs/yr	0.068 lb/MMBtu	2.61	0.31 lb/MMBtu	11.88	0.66 lb/MMBtu	25.29	40 µg/L	0.83	16.8 lb/MMscf	0.61
8	Camp Generator 1	455 ekW	1,500 hrs/yr	3.5 g/kW-hr	2.63	3.5 g/kW-hr	2.63	0.4 g/kW-hr	0.30	0.1 g/kW-hr	0.08	2.1E-04 lb/gal	0.005
9	Camp Generator 2	455 ekW											
10	Camp Generator 3	334 ekW	1,500 hrs/yr	3.96 g/hp-hr	2.93	0.59 g/hp-hr	0.44	0.18 g/hp-hr	0.13[7]	0.30 g/hp-hr	0.22	2.1E-04 lb/gal	0.004
11	Camp Generator 4	334 ekW											
Existing Stationary Source Total:					**39.86**		**21.59**		**2.03**		**2.17**		**0.06**
Stationary Source's Total with ORLs:					**39.60**		**97.98**		**84.89**		**5.80**		**4.83**
Change in PTE with ORLs:					**-0.26**		**+76.39**		**+82.86**		**+3.63**		**+4.77**

Notes

1 PTE was calculated using the following parameters and conversions: (a) AP-42 Appendix A, Page A-6: 1050 Btu/scf; (b) 100 ppm sulfur content; (c) ULSD sulfur content of 0.0015 wt. percent; (d) Fuel consumption of EU IDs 1 and 2 @ 100% load to be 21,146 scf/hr (9,336 Btu/ekW-hr); (e) BSFC from AP-42 Section 3.4, Page 3.4-5: 7,000 Btu/hp-hr; (f) Distillate Oil from AP-42, Appendix A, Page A-5: 140,000 Btu/gal; and (g) Distillate Oil from EPA AP-42 Appendix A, Page A-6 of 7.05 lb/gal.

2 NOx, CO, and VOC EFs are as follows: (a) Vendor Data for EU IDs 1 (5% O_2 [dry]), 2 (5% O_2 [dry]), and 8 through 11 (100% load); (b) EPA AP-42, Table 1.4-2 for EU IDs 3 and 4; (c) GRI-GlyCalc for EU ID 5 VOC EF (5.7559 tpy from flash tank off-gas, and 97.9611 tpy from uncontrolled regenerator emissions); and (d) EPA AP-42, Table 13.5-2 for EU IDs 6 and 7.

3 PM EFs are as follows: (a) EPA AP-42, Table 3.2-3 for EU IDs 1 and 2; (b) EPA AP-42 Table 1.4-2 for EU IDs 3 and 4; (c) EPA AP-42, Table 13.5-1 (lightly smoking flares) for EU IDs 6 and 7; and (d) Vendor Data for EU IDs 8 through 11 (100% load).

4 SO_2 EFs were derived using mass balance via the following calculations (assumes 379.9 scf for 1 mol at standard temperature [60 °F] and pressure [14.7 psia]):

(a) EU IDs 1 through 4, 6, and 7: $\frac{100\ ppm * \frac{64\ lb\ SO_2}{1\ mol\ of\ SO_2} * \frac{1\ mol}{379.9\ scf}}{1000000} = 16.8\ lb/MMscf$ and;

(b) EU IDs 8 through 11: $\frac{0.0015\ wt\%}{100} * 7.05 \frac{lb}{gal} = 2.1 * 10^{-4}\ lb/gal$

5 Assumes catalyst control efficiency of 45%.

6 Assumes flare combustion efficiency of 98%.

7 Emission factor used is for total hydrocarbons, including methane, and is therefore a conservative assumption of emissions for VOC.

Table 4 presents the existing PTE of EU IDs 8 through 11, along with new unrestricted PTE of EU IDs 1 through 7. As shown in the table, the potential emissions increases without the ORLs would exceed the minor permit thresholds under 18 AAC 50.502(c)(4), Title V thresholds under 18 AAC 50.326, and PSD thresholds under 18 AAC 50.306.

Table 4 – Existing Stationary Source's PTE and Unrestricted PTE of New EU IDs 1 through 7, in Tons per Year (TPY)

EU ID	Unit ID/ Description	Max. Rating or Capacity	Potential Operation/Fuel Consumption	NO_x		CO		VOC		PM/PM-10/PM-2.5		SO_2	
				EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)	EF	PTE (tpy)
1	Generator 1	2,889 bhp	8,760 hrs/yr	0.50 g/bhp-hr	13.92	2.14 g/bhp-hr	59.57	0.73 g/bhp-hr	20.32	0.02 lb/MMBtu	1.71	16.8 lb/MMscf	1.56
2	Generator 2	2889 bhp	8,760 hrs/yr	0.50 g/bhp-hr	13.92	2.14 g/bhp-hr	59.57	0.73 g/bhp-hr	20.32	0.02 lb/MMBtu	1.71	16.8 lb/MMscf	1.56
3	Inlet Heater	2.5 MMBtu/hr	8,760 hrs/yr	2.2 lb/MMscf	0.02	84 lb/MMscf	0.88	5.5 lb/MMscf	0.06	7.6 lb/MMscf	0.08	16.8 lb/MMscf	0.18
4	Gas Dehydration Reboiler Heater	1.0 MMBtu/hr	8,760 hrs/yr	2.2 lb/MMscf	0.009	84 lb/MMscf	0.35	5.5 lb/MMscf	0.02	7.6 lb/MMscf	0.03	16.8 lb/MMscf	0.07
5	Glycol Dehydration Process Vents	6 MMscf/day	8,760 hrs/yr	NA	0	NA	0	103.717 tpy	103.72	NA	0	NA	0
6	Flare	10 MMscf/day	8,760 hrs/yr	0.068 lb/MMBtu	130.3	0.31 lb/MMBtu	594.04	0.66 lb/MMBtu	1,264.73	40 µg/L	41.68	16.8 lb/MMscf	30.74
7	Flare - Pilot and Purge Gas	0.2 MMscf/day	8,760 hrs/yr	0.068 lb/MMBtu	2.61	0.31 lb/MMBtu	11.88	0.66 lb/MMBtu	25.29	40 µg/L	0.83	16.8 lb/MMscf	0.61
8	Camp Generator 1	455 ekW	5,250 hrs/yr	3.5 g/kW-hr	9.20	3.5 g/kW-hr	9.20	0.4 g/kW-hr	1.05	0.1 g/kW-hr	0.26	2.1E-04 lb/gal	0.02
9	Camp Generator 2	455 ekW	5,250 hrs/yr		9.20		9.20		1.05		026		0.02
10	Camp Generator 3	334 ekW	5,500 hrs/yr	3.96 g/hp-hr	10.73	0.59 g/hp-hr	1.60	0.18 g/hp-hr	0.49	0.30 g/hp-hr	0.81	2.1E-04 lb/gal	0.01
11	Camp Generator 4	334 ekW	5,500 hrs/yr		10.73		1.60		0.49		0.81		0.01
Existing Stationary Source Total:					**39.86**		**21.59**		**2.03**		**2.17**		**0.06**
Stationary Source's Total without new ORLs:					**200.64**		**747.88**		**1,437.54**		**48.20**		**34.79**
Change in PTE without ORLs:					**+160.78**		**+726.29**		**+1,435.51**		**+46.03**		**+34.73**

Attachment A. Notification Form[1]

Mustang Pad — **Stationary Source Name**

AQ1328ORL01 — **Air Quality ORL Number.**

Mustang Holding, LLC

Company Name

When did you discover the Excess Emissions/ORL Deviation?

Date: ____/____/____ Time: ____:____

When did the event/deviation occur?

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

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

What was the duration of the event/deviation? ____:____ (hrs:min) or ____days

(total # of hrs, min, or days, if intermittent then include only the duration of the actual emissions/deviation)

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

☐ Excess Emissions - Complete Section 1 and Certify

Note: All "excess emissions" are also "ORL deviations." However, use only Section 1 for events that involve excess emissions.

☐ Deviation from ORL Conditions - Complete Section 2 and Certify

Note: Use only Section 2 for ORL deviations that do not involve excess emissions.

☐ Deviation from COBC[2], CO[3], or Settlement Agreement - Complete Section 2 and Certify

1 Form based on SPC IV (revised as of July 22, 2020).
2 Compliance Order By Consent
3 Compliance Order

Section 1. Excess Emissions

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

(b) **Cause of Event** (Check one that applies. Complete a separate form for each event, as applicable.):

☐Start Up/Shut Down
☐Natural Cause (weather/earthquake/flood)
☐Control Equipment Failure
☐Scheduled Maintenance/Equipment Adjustments
☐Bad fuel/coal/gas
☐Upset Condition
☐Other _____

(c) **Description**

Describe briefly what happened and the cause. Include the parameters/operating conditions exceeded, limits, monitoring data and exceedance. Attach supporting information if necessary.

(d) **Emissions Units (EU) Involved:**

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

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

(e) **Type of Incident:** (Please check all that apply and provide the value requested, if any):

☐ Opacity _____%
☐ Control Equipment Down
☐ Emission Limit Exceeded
☐ Flaring
☐ Other**:** _____
☐ Venting _____(gas/scf)
☐ Fugitive Emissions
☐ Marine Vessel Opacity

(f) **Corrective Actions:**

Describe actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence. Attach supporting information if necessary.

(g) **Unavoidable Emissions:**

Do you intend to assert that these excess emissions were unavoidable? ☐ YES ☐ NO

Do you intend to assert the affirmative defense of 18 AAC 50.235? ☐ YES ☐ NO

Certify Report (<u>go to end of form</u>)

Section 2. ORL Deviations

(a) **ORL Deviation Type:** (Check all boxes that apply per event. Complete a separate form for each event, as applicable.)

- ☐ Emissions Unit-Specific Requirements
- ☐ Stationary Source-Wide Specific Requirements
- ☐ Monitoring/Recordkeeping/Reporting Requirements
- ☐ General Source Test Requirements
- ☐ Compliance Certification Requirements
- ☐ Standard/Generally Applicable Requirements
- ☐ Other: _____

(b) **Emissions Units (EU) Involved:**

Identify the emissions units involved in the event, using the same identification number and name as in the ORL. List the corresponding ORL condition and the deviation.

EU ID	EU Name	ORL Condition /Potential Deviation

(c) **Description of Potential Deviation:**

Describe briefly what happened and the cause. Include the parameters/operating conditions and the potential deviation. Attach supporting information if necessary.

(d) **Corrective Actions:**

Describe actions taken to correct the deviation or potential deviation and to prevent future recurrence. Attach supporting information if necessary.

Certification:

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

Printed Name:_____Title_____Date _____

Signature:_____Phone number_____