



eni us operating

eni us operating co. inc.
3700 Centerpoint Dr., Suite 500
Anchorage, AK 99503
Tel. 907-865-3300
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DELIVERY by E-MAIL

September 30, 2024

Alaska Department of Environmental Conservation
Air Permit Program
Attn: Air Permit Application Intake Clerk
555 Cordova Street
Anchorage, Alaska 99501

**Subject: Nikaitchuq Development
Title V Permit No. AQ0923TVP02
Application Revision for Renewal of the Title V Operating Permit**

Dear Air Permit Application Intake Clerk,

Eni US Operating Co. Inc. (Eni) is revising the permit renewal application under 40 CFR 71.5 and 18 AAC 50.326 for Air Quality Operating Permit No. AQ0923TVP02 submitted on July 22, 2024, for the Nikaitchuq Development stationary source located on the North Slope of Alaska.

Application Organization

The Department's standard Title V operating permit application forms were used where relevant to prepare the revision to the renewal application. The application that accompanies this letter contains the following sections:

Form Series A

ADEC Title V Standard Form A1-R: Stationary Source Supplemental Information or Application Revision

Form Series B

ADEC Title V Standard Forms B2: Emission Unit 32 Details. All applicable emission unit-specific permit conditions are listed using the condition numbering of the current permit and changes to the emission unit-specific permit shields. Condition 28 is removed and requested revisions to this condition are

detailed in Form E3. Please note that any proposed changes to conditions to remove existing terms are indicated as strikethroughs.

Form Series E

ADEC Title V Standard Form E3: Title V Condition Change Request. This form documents all proposed/requested permit revisions. The basis for each proposed/requested permit revision is provided in Form E3.

ADEC Title V Standard Form E5: Alternative Monitoring Procedures. The performance test waivers granted by EPA for NSPS Subpart KKKK-affected turbines at Nikaitchuq are summarized in, and attached to, this form. Amendments from two additional performance test waivers and updates from 40 CFR 63 Subpart ZZZZ have been included.

Test waivers: 2012 EPA test waivers, 2020 EPA test waivers, and 2023 EPA test waivers.

Other Information

Electronic Copy of Application

If you have any questions, please contact me at 907-865-3300 or the application contact Chris Lindsey with SLR International Corporation at 907-264-6916.

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,



Stephanie Rupert

Alaska Safety, Environmental and Quality (SEQ) Manager

cc: Kirsten Hoppe, Eni
Nikaitchuq Environmental Coordinator, Eni
Chris Lindsey, SLR

US EPA Region 10, Part 70 Operating Permit Program, M/S OAW-150, 1200 Sixth Avenue, Suite 900, Seattle, WA 98101 (by email)

Enclosure: Application Revision for Title V Operating Permit Renewal



Application Revision for Renewal of an Air Quality Title V Operating Permit

Nikaitchuq Development

Eni US Operating Co. Inc.

3700 Centerpoint Drive, Suite 500
Anchorage, AK 99519

Prepared by:

SLR International Corporation

2700 Gambell Street, Suite 200, Anchorage, Alaska, 99503

September 30, 2024

Appendices

Appendix A Stationary Source

A.1 Form A1: Stationary Source Supplemental Information or Application Revision

Appendix B Emission Units

B.1 Form B2: Emission Unit Detail Form – Internal Combustion Equipment

Appendix C Pollution Control Devices – *Not Applicable*

Appendix D Emissions Summary – *Not Applicable*

Appendix E Regulatory Requirements

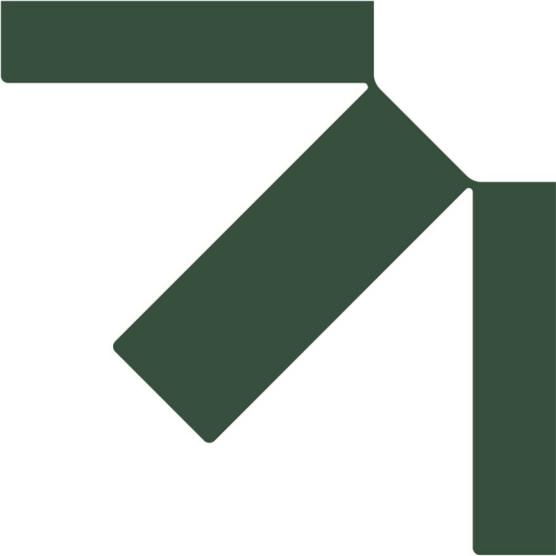
E.1 Form E3: Title V Condition Change Request

E.2 Form E5: Alternative Monitoring Procedures (AMP) From

E.3 Attachment: 2012 EPA Test Waivers, 2020 Test Waivers, and 2023 Test Waivers

Appendix F Permits – *Not Applicable*





Appendix A Stationary Source

Application Revision for Renewal of an Air Quality Title V Operating Permit

Nikaitchuq Development

Eni US Operating Co. Inc.

September 30, 2024



**A.1 Form A1: Stationary Source Supplemental Information or
Application Revision**

FORM A1-R

Stationary Source Supplemental Information or Application Revision

Permit Number: AQ0923TVP02

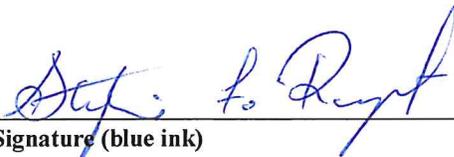
Permit Contact:	Name	Stephanie Rupert
	Title	SEQ Manager Alaska
Mailing Address Line 1	3700 Centerpoint Drive, Suite 500, Anchorage, AK 99503	
Mailing Address Line 2		
	Phone Number	(907) 865-3300
	Email	stephanie.rupert@eni.com
Brief Description of Supplemental Information or Application Revision: This application includes a revised form Form B2 for EU ID 32, Form E3, and Form E4. Supporting documents include two test wavier letters.		

Statement of 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.

Stephanie Rupert

Name of Responsible Official



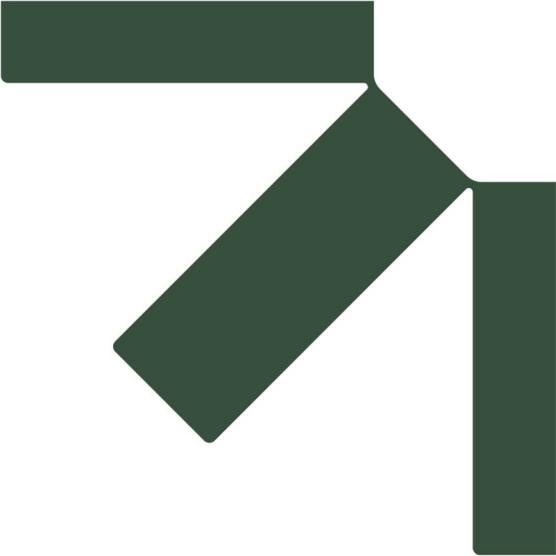
Signature (blue ink)

SEQ Manager Alaska

Title

10/7/24

Date



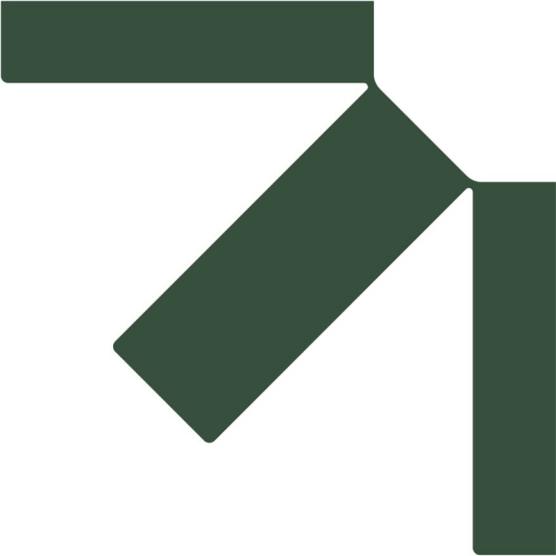
Appendix B Emission Units

Application Revision for Renewal of an Air Quality Title V Operating Permit

Nikaitchuq Development

Eni US Operating Co. Inc.

September 30, 2024



**B.1 Form B2: Emission Unit Detail Form – Internal Combustion
Equipment**

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Permit Number: AQ0923TVP02

1.	Emission Unit ID Number // Operating Scenario	32 / Base
2.	Date installation/construction commenced ¹	2010
3.	Date installed	2010
4.	Emission Unit serial number	23877-01
5.	Special control requirements? [if yes, describe]	No
6.	Manufacturer and model number	Solar Taurus 70
7.	Type of combustion device	Dual Fuel Turbine
8.	Rated design capacity (horsepower rating for engines)	N/A
9.	Rated design capacity (heat input, MMBtu/hr rating for turbines)	Approximately 88.5 MMBtu/hr (fuel gas) / 82.6 MMBtu/hr (diesel)
10.	If used for power generation, electrical output (kW)	8,250 kW (fuel gas) / 7,700 kW (diesel)

- ¹. See page 2 of the Form B instructions regarding installation/construction date and consult regulations under 40 C.F.R. 60 (NSPS) and 40 C.F.R. 63 (NESHAP) for applicability dates, e.g.,
- NSPS Subparts IIII and JJJJ, and NESHAP Subpart ZZZZ for engines, and
- NSPS Subparts GG and KKKK, and NESHAP Subpart YYYYY for turbines.
Note that other regulations may apply in addition to the regulations cited.

11. Fuel usage: [for EACH fuel, enter]:

Fuel	Maximum hourly firing rate (specify units)
Natural Gas	Approximately 82.6 Mscf/hr
Diesel	Approximately 646 gal/hr

12.	Describe any specific modifications to the emission unit that must be addressed in the permit: N/A
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FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Applicable Requirements*):

Permit and Condition Number	Applicable Requirement Citation ¹	Parameter/Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Methods Used to Demonstrate Compliance
AQ0923TVP02 – Condition 1	18 AAC 50.040(j)(4), 50.055(a)(1), 50.326(j)(3) & 50.346(c); 40 CFR 71.6(a)(1)	Visible Emissions Standards	Visible emissions may not reduce visibility by more than 20 percent averaged over any six consecutive minutes.	Yes	Incorporate revised Standard Permit Conditions VIII and IX. Monitoring, recordkeeping, and reporting (MR&R) in accordance with Conditions 1.5 and/or 14.
AQ0923TVP02 – Condition 7	18 AAC 50.040(j)(4), 50.055(b)(1), 50.326(j)(3) & 50.346(c); 40 CFR 71.6(a)(1)	Particulate Matter Emissions Standards	Do not cause or allow particulate matter to exceed 0.05 grains per cubic foot of exhaust gas averaged over three hours.	Yes	Incorporate revised Standard Permit Condition IX. MR&R in accordance with Condition 7.6 and 1.5.
AQ0923TVP02 – Condition 15	18 AAC 50.040(j)(4), 50.055(c), 50.326(j)(3) & 50.346(c); 40 CFR 71.6(a)(1)	Sulfur Compound Emissions Standards	The Permittee shall not cause or allow sulfur compound emissions, expressed as SO ₂ , to exceed 500 ppm averaged over three hours.	Yes	Incorporate revised Standard Permit Condition XI. MR&R in accordance with Conditions 15.1 and 27.
AQ0923TVP02 – Condition 20.3 and 20.3a	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a)(1); Conditions 6 & 7, Minor Permit AQ0923MSS11	Pre-Construction Permit Requirements – Emissions and Fuel Control Settings and Stacks	The Permittee shall provide the revised settings and the reason for the revision in the operating report submitted under Condition 95 for that reporting period, if the Permittee makes changes to the emission and fuel control settings and stacks of the turbines, EU IDs 1, 2, 32, and 33.	Yes	Reporting in accordance with Conditions 20.3 and 20.3a.

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

AQ0923TVP02 – Condition 21	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a)(1) & (3); Condition 14, Minor Permit AQ0923MSS11	Limits to Avoid PSD Major Classification	Limit CO and NO _x emissions to no more than 225 tons per 12-month rolling period for each pollutant.	Yes	MR&R as required by Conditions 21.1 through 21.4.
AQ0923TVP02 – Condition 22	18 AAC 50.040(j)(4) & 50.326(j)(4); 40 CFR 71.6(a)(3) & (c)(6)	Verification of Turbine Emission Factors	Conduct a winter performance test on one of EUs 1, 2, 32, or 33 to verify CO and NO _x emission factors.	Yes	MR&R as required by Conditions 22.1 through 22.4.
AQ0923TVP02 – Condition 23.3	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a); Condition 15 and Table 5, Minor Permit AQ0923MSS11	General AAQS Provisions – Minimum Stack Heights Requirements	Maintain the exhaust stack for each EU listed in Table B with a release height (above ground) that meets or exceeds the indicated height.	Yes	Record Review
AQ0923TVP02 – Condition 26.1	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a); Conditions 18.1, 22.1(a) – (c) & (e), and Table 6, Minor Permit AQ0923MSS11	NO ₂ and SO ₂ Ambient Air Quality Protection	Limit the operation on diesel to no more than 600 hr/yr.	Yes	MR&R as required by Conditions 26.1a through 26.1e.

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

AQ0923TVP02 – Condition 27.1	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a); Condition 19, Minor Permit AQ0923MSS11	SO ₂ Ambient Air Quality Protection	While burning natural gas, burn only natural gas with a hydrogen sulfide content that does not exceed 250 ppmv (on an instantaneous basis at standard conditions).	Yes	MR&R as required by Conditions 27.1a through 27.1d.
AQ0923TVP02 – Condition 27.2	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a); Condition 19, Minor Permit AQ0923MSS11	SO ₂ Ambient Air Quality Protection	While burning diesel fuel, burn only ultra low sulfur diesel fuel.	Yes	MR&R as required by Conditions 27.2a through 27.2d.
AQ0923TVP02 – Condition 31	18 AAC 50.040(a)(1); 40 CFR 60.7(b)	NSPS Subpart A Startup, Shutdown, and Malfunction Requirements	Maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the emission unit and malfunctions of associated air-pollution control equipment.	Yes	Recordkeeping in accordance with Condition 31.
AQ0923TVP02 – Condition 32	18 AAC 50.040(a)(1); 40 CFR 60.7(c) & 60.4375(a)	NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report	Submit Excess Emission and Monitoring Systems Performance (EEMSP) reports as specified in this Condition.	Yes	MR&R as required by Conditions 32.1 through 32.4.
AQ0923TVP02 – Condition 33	18 AAC 50.040(a)(1); 40 CFR 60.7(c) & (d)	NSPS Subpart A Summary Report Form	Submit to ADEC and EPA semiannually a “summary report form” as specified in this Condition.	Yes	MR&R as required by Conditions 33, 33.1 and 33.2.

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

AQ0923TVP02 – Condition 36	18 AAC 50.040(a)(1); 40 CFR 60.11(g)	NSPS Subpart A Credible Evidence	For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of the standards set forth in Conditions 41, 42, 48, and 50, nothing in 40 CFR Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the emission unit would have been in compliance with applicable requirements of 40 CFR Part 60 if the appropriate performance or compliance test or procedure had been performed.	N/A	N/A – Advisory Provision
AQ0923TVP02 – Condition 37	18 AAC 50.040(a)(1); 40 CFR 60.12	NSPS Subpart A Concealment of Emissions	The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	Yes	Reasonable Inquiry
AQ0923TVP02 – Condition 46	18 AAC 50.040(a)(2)(QQ) & (j)(4) & 50.326(j); 40 CFR 71.6(a)(1) , & 60.4305(a)	NSPS Subpart KKKK Applicability	For EU IDs 1, 2, 32, and 33 listed in Table A, the Permittee shall comply with the applicable requirements for stationary combustion turbines with a heat input at peak load equal to or greater than 10.7 gigajoules (10 MMBtu) per hour, based on the higher heating value of the fuel, which commenced construction, modification, or reconstruction after February 18, 2005.	Yes	Record Review

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

AQ0923TVP02 – Conditions 47 and 47.1	18 AAC 50.040(a)(2)(QQ) & (j)(4) & 50.326(j); 40 CFR 71.6(a)(1) & 60.4333(a) & (b)	NSPS Subpart KKKK GAPCP and General Requirements	Operate and maintain air pollution control equipment, and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.	Yes	Reasonable Inquiry / Record Review
AQ0923TVP02 – Condition 47.2	18 AAC 50.040(a)(2)(QQ) & (j)(4) and 50.326(j); 40 CFR 71.6(a)(1) & 60.4333(a) & (b)	NSPS Subpart KKKK GAPCP and General Requirements	When any of EU IDs 1, 2, 32, and 33 is equipped with heat recovery system and utilizes a common steam header with one or more combustion turbines, the Permittee shall either: a. Determine compliance with the NO _x emissions limit in Condition 48 by measuring the emissions combined with the emissions from the other unit(s) utilizing the common heat recovery unit; or b. Develop, demonstrate, and provide information satisfactory to the Administrator on methods for apportioning the combined gross energy output from the heat recovery unit for each of the affected combustion turbines. The Administrator may approve such demonstrated substitute methods for apportioning the combined gross energy output measured at the steam turbine whenever the demonstration ensures accurate estimation of emissions related under this part.	Yes	Reasonable Inquiry / Record Review
AQ0923TVP02 – Condition 48	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a)(1), 60.4320(a), 60.4325 & Table 1 of Subpart KKKK	NSPS Subpart KKKK NO _x Standard	The Permittee shall meet the NO _x emission limit of: 150 ppm at 15 percent O ₂ or 1,100 ng/J of useful output (8.7 lb/MWh) for turbines located north of the Arctic Circle.	Yes	MR&R as required by Conditions 49.1 through 49.4.

FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

AQ0923TVP02 – Condition 50	18 AAC 50.040(j)(4) & 50.326(j); 40 CFR 71.6(a)(1) & 60.4330(a)(2)	NSPS Subpart K K K K SO ₂ Standard	Do not burn any fuel which contains total potential sulfur emissions in excess of 26 ng SO ₂ /J (0.060 lb SO ₂ /MMBtu) heat input.	Yes	MR&R as required by Conditions 51.1 through 51.4.
AQ0923TVP02 – Condition 79	18 AAC 50.235, 50.326(j) & 50.040(j)(4); 40 CFR 71.6(c)(6)	Technology- Based Emission Standard	If an unavoidable emergency, malfunction (as defined in 18 AAC 50.235(d)), or non-routine repair (as defined in 18 AAC 50.990(64)), causes emissions in excess of a technology-based emission standard listed in Conditions 41, 42, 48, 50, and 64 the Permittee shall the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard.	Yes	MR&R methods in accordance with Conditions 79.1, 79.2, and 94.1b.

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).]

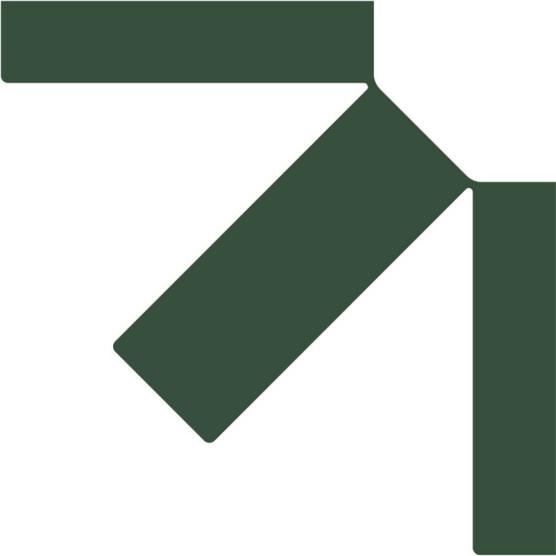
FORM B2

Emission Unit Detail Form - Internal Combustion Equipment (Engines and Turbines)

Non-applicable Requirements Specific to Emission Unit (*attach additional sheets as needed. Form B Supplement - Emission Unit-Specific Permit Shield Request*):

Non-Applicable Requirements ¹	Reason for non-applicability and citation/basis
40 CFR 60 Subpart GG Standards of Performance for Stationary Combustion Turbines	Per 40 CFR 60.4305(b), stationary combustion turbines regulated under 40 CFR Subpart KKKK are exempt from the requirements of Subpart GG.
40 CFR 60 Subpart KKKK Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4335, 60.4355	EU ID 32 does not use water or steam injection.
40 CFR 60 Subpart KKKK Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4340(b), 60.4345, 60.4350, 60.4405, 60.4410	CEMS or continuous parameter monitoring is not used to monitor compliance
40 CFR 60 Subpart KKKK Standards of Performance for Stationary Combustion Turbines 40 CFR 60.4390	EU ID 32 is not an emergency combustion turbine or research and development turbine.
40 CFR 63 Subpart YYYY National Emission Standards for Hazardous Air Pollutants for Stationary Combustion Turbines	The stationary source is not a major source of hazardous air pollutants.

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).]



Appendix C **Pollution Control Devices – *Not Applicable***

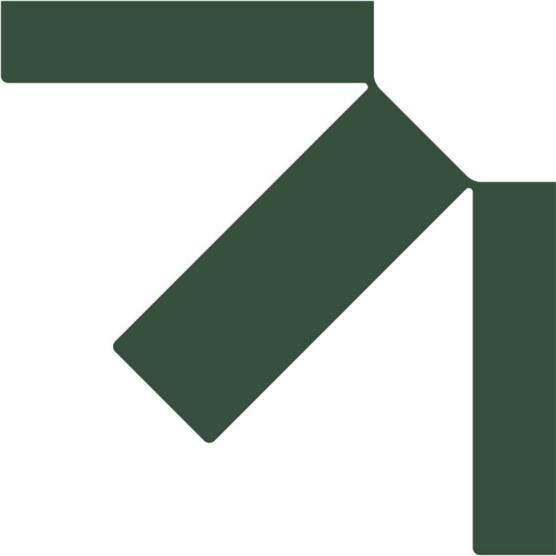
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Operating Permit**

Nikaitchuq Development

Eni US Operating Co. Inc.

September 30, 2024





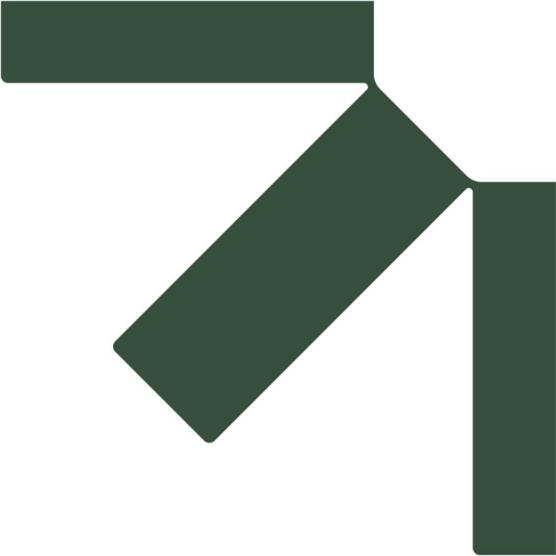
Appendix D Emissions Summary – *Not Applicable*

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Nikaitchuq Development

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September 30, 2024



Appendix E Regulatory Requirements

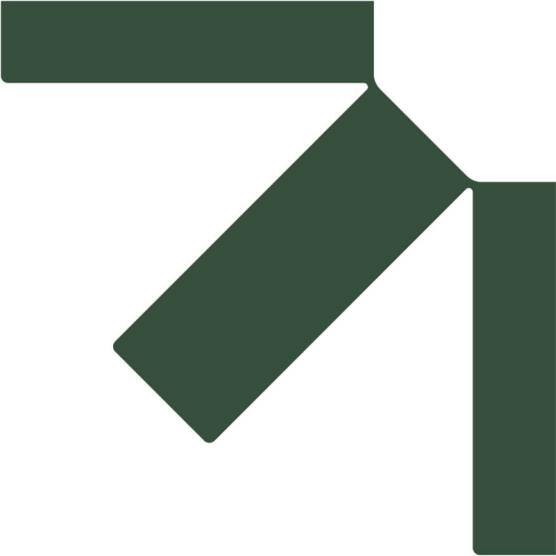
Application Revision for Renewal of an Air Quality Title V Operating Permit

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- E.1 Form E3: Title V Condition Change Request**
 - E.2 Form E5: Alternative Monitoring Procedures (AMP) From**
 - E.3 Attachment: 2012 EPA Test Waivers, 2020 Test Waivers, and 2023 Test Waivers**

FORM E3
Title V Condition Change Request

Permit Number: AQ0923TVP02

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
Condition 1.1	Revise	Update Condition 1.1 to be consistent with Standard Permit Condition (SPC) VIII – Visible Emissions and Particulate Matter Monitoring Plan for Gas Fuel-Burning Equipment, as revised as of July 22, 2020.	Update to match the recently revised standard permit condition.
Conditions 1.2 and 7.2	Revise	EU ID 69 was removed from service and replaced with an electric unit.	For each of EU IDs 69 through 70, 71, 109, 110, 114, and 115
Condition 1.3	Revise	EU IDs 64, 68, and 116 are significant per 18 AAC 50.326(d)(1), but otherwise insignificant based on historical actual emissions. Visible emissions MR&R is only necessary if emissions exceed the significant emissions thresholds. EUs 64, 68, and 116 have historically had actual emissions less than the significant emissions thresholds in 18 AAC 50.326(e).	Update this condition to add EUs 64, 68, and 116. and make consistent with Standard Permit Condition (SPC) IX (Revised July 22, 2020), for emissions units that are significant per 18 AAC 50.326(d)(1) but are otherwise insignificant based on historical actual emissions per 18 AAC 50.326(e). ... and EU ID 50 (fire water pump), <i>EU IDs 64, 68, and 116</i> listed in Table A...
Condition 1.4	Revise	EU ID 107 was removed from service and replaced with an electric unit. Remove EU IDs 64, 68, and 116 from this Condition since these EU IDs are significant per 18 AAC 50.326(d)(1) but are otherwise insignificant based on historical actual emissions per 18 AAC 50.326(e). See requested changes to Condition 1.3.	For the liquid fuel-fired engines, turbines, boilers, and heaters, EU IDs 3, 47, 49, 64, 68, 93, 107, and 108 and 116 ...
Conditions 2 and 2.1	Revise	EU ID 107 was removed from service and replaced with an electric unit.	...EU IDs 3, 9 through 13, 23, 24, 47, 49, 50, 64, 68, 93, 98 through 101, 107, 108, and 116...

FORM E3
Title V Condition Change Request

Condition 6	Remove	EU ID 96 was removed from service and is inoperable.	Please remove condition.
Condition 7	Revise	EU ID 96 was removed from service and is inoperable.	...the gasoline dispensing facility (EU ID 118), and the incinerator (EU ID 96) , listed in Table A...
Condition 7.3	Revise	EU IDs 64, 68, and 116 are significant per 18 AAC 50.326(d)(1), but otherwise insignificant based on historical actual emissions. PM MR&R is only necessary if emissions exceed the significant emissions thresholds. EUs 64, 68, and 116 have historically had actual emissions less than the significant emissions thresholds in 18 AAC 50.326(e).	Update this condition to add EUs 64, 68, and 116. and make consistent with Standard Permit Condition (SPC) IX (Revised July 22, 2020), for emissions units that are significant per 18 AAC 50.326(d)(1) but are otherwise insignificant based on historical actual emissions per 18 AAC 50.326(e). ... and EU ID 50 (fire water pump), <i>EU IDs 64, 68, and 116</i> listed in Table A...
Condition 7.4	Revise	Remove EU IDs 64, 68, and 116 from this Condition since these EU IDs are significant per 18 AAC 50.326(d)(1) but are otherwise insignificant based on historical actual emissions per 18 AAC 50.326(e). See requested changes to Condition 7.3.	For the liquid fuel-fired engines, turbines, boilers, and heaters, EU IDs 3, 47, 49, 64, 68, 93, 107, and 108 and 116 ...
Condition 7.5	Revise	EU ID 107 was removed from service and replaced with an electric unit.	For the liquid fuel-fired boilers, and heaters, EU IDs 407 and 108 , EU IDs 9...
Condition 11	Revise	EU ID 107 was removed from service and replaced with an electric unit.	The Permittee shall conduct source tests on EU IDs 9 through 13, EU IDs 23 and 24 (if triggered per Condition 7.3), EU IDs 98 through 101, 407, and 108...
Condition 15	Revise	EU IDs 69 and 107 were removed from service and replaced with electric units.	The Permittee shall not cause or allow sulfur compound emissions, expressed as SO ₂ , from EU IDs 1 through 4, 9 through 13, 23, 24, 32, 33, 47, 49, 50, 64, 68, 70 through 71, 93 through 95, 98 through 101, 106, 108 through 116, and 123, listed in Table A to exceed 500 ppm averaged over three hours

FORM E3
Title V Condition Change Request

Condition 21	Revise	EU IDs 69 and 107 were removed from service and replaced with electric units. EU ID 96 was removed from service and is inoperable.	...EU IDs 1, 2, 3, 4, 9 through 13, 23, 24, 32, 33, 47, 49, 50, 64, 68, 69 , 70, 71, 93 through 95 96 , 98 through 101, 106, 108 through 112, and 114 through 116 listed in Table A to no more than 225 tons...
Condition 21.1d	Revise	EU IDs 69 and 107 were removed from service and replaced with electric units.	Group D (Heaters and Boilers, EU IDs 9 through 13, 23, 24, 69 , 70, 71, 94, 95, 98 through 101, 106, 108 through 112, 114, and 115).
Condition 21.1e	Remove	EU ID 96 was removed from service and is inoperable.	Please remove condition.
Condition 23.2b	Revise	EU IDs 69 and 107 were removed from service and replaced with electric units.	The Permittee may use capped stacks for the following units: EU IDs 47, 69 70, through 71, 94, 95, and 106, 108 through 112, 114, and 115.

FORM E3
Title V Condition Change Request

Condition 28	Revise	On January 5, 2023, Eni received a waiver from EPA conditionally granting an alternative monitoring plan for EU ID 32.	<p>Source Testing Requirements, EU ID 32. If the 12-month rolling total operating hours for EU ID 32 when operating on ULSD exceeds the limit specified in Table C, the Permittee shall comply with the following: A performance test shall be performed in accordance with 40 CFR 60.4400 to demonstrate continuous compliance with the NOx emission limit in Table 1 of NSPS KKKK for EU 32 when fired on ULSD not later than the earlier of the following dates:</p> <ul style="list-style-type: none"> a. Five years (60 months) after the previous performance test, or b. If cumulative operation of EU 32 on ULSD since the previous performance test exceeds the limit specified in Table C, the later of the following dates: <ul style="list-style-type: none"> i. Within 180 days after the end of the calendar month during which the cumulative operation of EU 32 on ULSD since the previous performance test exceeds 600 hours, or ii. when a performance test would have been required by 40 CFR 60.4340(a) (within 14 or 26 months).
Condition 29	Remove	EU ID 96 was removed from service and is inoperable.	Please remove condition.
Condition 49.1c	Revise	On June 8, 2020, Eni received a modification to the 2012 test waivers to include “maintenance engine swaps.”	<p>Please revise the condition to include a new subcondition for the following:</p> <p>(iv) Should a maintenance engine swap occur, the timing between tests shall remain as though no replacement had occurred and any initial testing that may be required as a result of a replacement is waived.</p>

FORM E3
Title V Condition Change Request

New Footnote to Condition 49.1c	Revise	On June 8, 2020, Eni received a modification to the 2012 test waivers to include “maintenance engine swaps.”	A maintenance engine swap includes the replacement of the engine core of a turbine with a tuned and inspected equivalent component.
Condition 55 .1a	Revise	The term “annually” was further defined in 40 CFR 63 Subpart ZZZZ.	Change oil and filter every 1,000 hours of operation or annually <i>within 1 year + 30 days of the pervious change</i> , whichever comes first, except as allowed by Condition 55.4;
Condition 55 .1b	Revise	The term “annually” was further defined in 40 CFR 63 Subpart ZZZZ.	Inspect air cleaner every 1,000 hours of operation or annually <i>within 1 year + 30 days of the pervious change</i> , whichever comes first, and replace as necessary; and
Condition 55 .1c	Revise	The term “annually” was further defined in 40 CFR 63 Subpart ZZZZ.	Inspect all hoses and belts every 500 hours of operation or annually <i>within 1 year + 30 days of the pervious change</i> , whichever comes first, and replace as necessary.
Footnote 21	Revise	Changes to 40 CFR 63 Subpart ZZZZ occurred on August 30, 2024.	The provisions of NESHAP Subpart ZZZZ listed in Conditions 53 through 57 are current as amended through February 27, 2014 August 30, 2024. Should EPA promulgate revisions to this subpart, the Permittee shall be subject to the revised final provisions as promulgated and not the superseded provisions summarized in these conditions.
Condition 74	Revise	EU IDs 69 and 107 were removed from service and replaced with electric units. EU ID 96 was removed from service and is inoperable.	The Permittee shall do the following for EU IDs 4, 9 through 20, 23, 24, 69 through 70 , 71, 74, 75, 78, 94, 95, 97 through 105, 107 108 through 110, 111, 112, 114, 115, 117, and 123 through 125:

FORM E5
Alternative Monitoring Procedures (AMP) Form

Permit Number: AQ0923TVP02

Stationary Source-Wide Alternative Monitoring Procedures and/or EPA Waivers (attach additional sheets as needed):

Condition for which AMP or EPA waiver is applicable	Parameter/ Pollutant	Limit/Standard/ Requirement	Currently in Compliance?	Monitoring, Recordkeeping and Reporting Used to Determine Compliance
Condition 28	Test Waiver for Turbine Subject to NSPS KKKK while operating on ULSD	A performance test shall be performed in accordance with 40 CFR 60.4400 to demonstrate continuous compliance with the NOx emission limit in Table 1 of NSPS KKKK for EU 32 when fired on ULSD not later than the earlier of the following dates: a. Five years (60 months) after the previous performance test, or b. If cumulative operation of EU 32 on ULSD since the previous performance test exceeds 600 hours, the later of the following dates: i. Within 180 days after the end of the calendar month during which the cumulative operation of EU 32 on ULSD since the previous performance test exceeds 600 hours, or ii. when a performance test would have been required by 40 CFR 60.4340(a) (within 14 or 26 months).	Yes	See performance test waiver letters included with the renewal application revision in Appendix E – R1 and Form E3-R1.
Condition 49.1c	Performance Test Waiver - Subject to NSPS KKKK	In each annual performance test, the Permittee may elect to test only one of EUs 1, 2, 32 while operating on natural gas, and 33 if the Permittee satisfies the provisions of Conditions 49.1c(i) through 49.1c(iii).	Yes	Monitoring, recordkeeping, and reporting as required by Conditions 49.1 through 49.4. See performance test waiver letters included with the renewal application in Appendix E.

Condition 49.1c	Amended Performance Test Waiver - Subject to NSPS KKKK	If a replacement of the engine core of a turbine with a tuned and inspected equivalent component occurs (a maintenance engine swap), the timing between tests shall remain as though no replacement had occurred and any initial testing that may be required as a result of a replacement is waived.	Yes	See performance test waiver letters included with the renewal application revision in Appendix E – R1 and Form E3-R1.

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).]



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
AIR, WASTE AND TOXICS

MAR 15 2012

Mr. Larry Burgess
HSE Manager – Alaska
Eni US Operating Company, Inc.
3800 Centerpoint Drive, Suite 300
Anchorage, Alaska 99503

Re: Eni US Operating Company, Inc. Oliktok Point Processing Facility
Initial Performance Test Waiver Request
New Source Performance Standards Subpart A – General Provisions
New Source Performance Standards Subpart KKKK – Standards of Performance for
Stationary Combustion Turbines

Dear Mr. Burgess:

The purpose of this letter is to respond to Eni US Operating Co. Inc's (Eni) letter, dated September 25, 2011, requesting the United States Environmental Protection Agency (EPA) to waive the initial performance test for emission unit number (EU No.) 32 (one of four identical gas-fired combustion turbines) at the Oliktok Point Processing Facility, Nikaitchuq Development Site, North Slope, Alaska. Eni also requested that subsequent periodic performance tests be conducted on one of the four combustion turbines.

EU No. 32, as well as the remaining three gas-fired combustion turbine (EU Nos. 1, 2, and 33) are an affected source subject to New Source Performance Standard (NSPS), Subpart A, General Provisions, and NSPS Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. Pursuant to NSPS § 60.7(a)(1), Eni provided the EPA with notification on September 9, 2010 that construction of three identical Solar Taurus 70-10301S turbines¹ (EU Nos. 1, 2 and 33) commenced when Eni entered into a contractual obligation to purchase the units. Eni also provided notification to the EPA on February 17, 2012, that the forth-identical Solar Taurus 70-10301S turbine² (EU No. 32) commenced construction onsite on September 15, 2011. All four turbines each have a maximum power output of 7,520 kWe and burn natural gas.

On July 20, 2011, the EPA approved Eni's request to waive the initial performance test for one of three turbines identified as EU Nos. 1, 2, and 33 in Air Quality Control Minor Permit No. AQ0923MSS05. Eni is now asking the EPA to waive the initial performance test for EU No. 32.

¹ These turbines are identified as EU Nos. 1, 2 and 33 in Air Quality Control Minor Permit No. AQ0923MSS05, issued by the Alaska Department of Environmental Conservation (ADEC).

² This turbine is identified as EU No 32 in Air Quality Control Minor Permit No. AQ0923MSS05, issued by the ADEC

Eni us operating co. inc. Oliktok Point Processing Facility
NSPS KKKK Initial and Subsequent Performance Test Waiver
March 14, 2012
Page 2 of 2

Pursuant to NSPS § 60.4400(a), EU No. 32 must comply with the emission standard for NO_x found in Table 1 to the subpart. NSPS § 60.8(a) requires an initial performance test to be conducted within 60 days of achieving maximum production rates but no later than 180 days after initial startup. EU Nos. 1 and 33 were tested in March 2011 and demonstrated compliance with the NO_x emission limit.³ According to Eni, as of February 29, 2012, the construction of EU No. 32 was not complete and the EU did not commenced initial startup.

According to NSPS § 60.8(b)(4), the EPA can waive a performance test if the owner/operator has demonstrated by other means that the affected facility is in compliance with the standard. Based on the EPA's review of the information presented by Eni and the NSPS Subpart A, the EPA grants Eni's request to waive the initial performance test for the Solar Taurus 70-10301S combustion turbine, Model AA28223000, Serial Number 23877-01 (EU No. 32). This March 14, 2012, initial subsequent performance test waiver is being combined with the EPA's July 20, 2011, initial subsequent performance test waiver applicable to Solar Taurus 70-10301S combustion turbine, Model AA28223000, Serial Numbers 21213-01 (EU No. 1), 21213-02 (EU No. 2), 23877-01 (EU No. 32), and 21213-03 (EU No. 33). (SEE Enclosure A)

Eni is required, as part of this waiver, to conduct subsequent performance tests on a different Solar Taurus 70-10301S (EU No, 1, 2, 32, or 33) combustion turbine so that by the end of the initial performance test and the three subsequent performance tests, all four turbines will be tested. In the event any subsequent performance test result is greater than 50 percent of the NO_x NSPS of 150 ppm, Eni will be required to conduct performance test on the Solar Taurus 70-10301S combustion turbine within 60 days of that test. Pursuant to NSPS §60.4375(b), a written report of the performance test should be submitted to the EPA. Once Eni can demonstrate that the NO_x performance test for all four Solar Taurus 70-10301S combustion turbine is less than or equal to 50 percent of the standard, Eni may continue to use this waiver.

The initial performance test waiver granted to Eni for three of four Solar Taurus combustion turbines and waiver of subsequent performance tests at the Oliktok Point Processing Facility at the Nikaitchuq Development Site does not alter the other requirements of NSPS Subparts A and KKKK. If you have questions regarding this response, please contact Natasha Greaves at (206) 553-7079.

Sincerely,


Krishna Viswanathan, Manager
Federal Delegated & Federal Programs

Enclosure

³ Emissions were less than 10 % of the allowable NO_x emission rate in Table 1 of the Subpart.

ENCLOSURE A



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

JUL 20 2011

OFFICE OF
AIR WASTE AND TOXICS

Mr. Larry Burgess
HSE Manager – Alaska
Eni us operating company incorporated
3800 Centerpoint Drive, Suite 300
Anchorage, Alaska 99503

Re: Eni us operating co. inc. Oliktok Point Processing Facility
Initial Performance Test Waiver Request
New Source Performance Standards Subpart A – General Provisions
New Source Performance Standards Subpart KKKK – Standards of Performance for Stationary
Combustion Turbines

Dear Mr. Burgess:

The purpose of this letter is to respond to eni us operating co. inc's letter, dated July 14, 2011, requesting the United States Environmental Protection Agency to waive the initial performance test for one of three identical gas-fired combustion turbines at the Oliktok Point Processing Facility, Nikaitchuq Development Site, North Slope, Alaska.

The turbine is an affected source subject to New Source Performance Standard (NSPS), Subpart A, General Provisions, and NSPS Subpart KKKK, Standards of Performance for Stationary Combustion Turbines. Pursuant to NSPS § 60.7(a)(1), eni provided EPA with notification on September 9, 2010, that construction of three identical Solar Taurus 70-10301S turbines had commenced when eni entered into a contractual obligation to purchase the units. These turbines each have a maximum power output of 7,520 kWe and burn natural gas. These turbines are identified as Emission Units 1, 2 and 33 in Air Quality Control Minor Permit No. AQ0923MSS05, issued by the Alaska Department of Environmental Conservation.

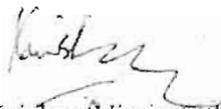
Pursuant to NSPS § 60.4400(a), EU numbers 1, 2 and 33 must comply with the emission standard for NOx found in Table 1 to the subpart. NSPS § 60.8(a) requires an initial performance test to be conducted within 60 days of achieving maximum production rates but no later than 180 days after initial startup. EU numbers 1 and 33 were tested in March 2011, and demonstrated compliance with the NOx emission limit.¹ EU 2 is now approaching the 180 day testing deadline after initial startup and has not yet conducted a performance test.

According to NSPS § 60.8(b)(4), EPA can waive a performance test if the owner/operator has demonstrated by other means that the affected facility is in compliance with the standard. Based on EPA's review of NSPS Subpart A, EPA grants eni's request to waive the initial performance test for the Solar Taurus 70-10301S combustion turbine, Model AA28223000, Serial Number 21213-02 (EU No. 2).

¹ Emissions were less than 10 % of the allowable NOx emission rate in Table 1 of the Subpart.

The initial performance test waiver granted to eni for one Solar Taurus combustion turbine at the Oliktok Point Processing Facility at the Nikaitchuq Development Site does not alter the other requirements of NSPS Subparts A and KKKK. If you have questions regarding this response, please contact John Pavitt of the Alaska Operations Office, at (907) 271-3688.

Sincerely,



Krishna Viswanathan, Acting Manager
Federal and Delegated Programs Unit

cc: Jim Baumgartner, ADEC, Juneau
ADEC Compliance Technician, Fairbanks
Dani Baldwin, SLR International Corp.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
AIR, WASTE AND TOXICS

APR 26 2012

Mr. Larry Burgess
HSE Manager – Alaska
Eni US Operating Company, Inc.
3800 Centerpoint Drive, Suite 300
Anchorage, Alaska 99503

Re: Eni US Operating Company, Inc. Oliktok Point Processing Facility
Initial Performance Test Waiver Request - Clarification
New Source Performance Standards Subpart A – General Provisions
New Source Performance Standards Subpart KKKK – Standards of Performance for
Stationary Combustion Turbines

Dear Mr. Burgess:

The purpose of this letter is to provide clarification to Eni US Operating Co. Inc. (Eni), on the United States Environmental Protection Agency's (EPA) March 15, 2012, letter, waiving the initial and subsequent performance test for four identical gas-fired combustion turbines at the Oliktok Point Processing Facility, Nikaitchuq Development Site, North Slope, Alaska. (SEE Enclosure A)

The initial and subsequent performance test waiver applies to four Solar Taurus 70-10301S turbines (EU Nos. 1, 2, 32 and 33). In the March 15, 2012, letter, EPA stated that "In the event any subsequent performance test result is greater than 50 percent of the NO_x NSPS of 150 ppm, Eni will be required to conduct performance test on the Solar Taurus 70-10301S combustion turbine within 60 days of that test. Pursuant to NSPS §60.4375(b), a written report of the performance test should be submitted to the EPA. Once Eni can demonstrate that the NO_x performance test for all four Solar Taurus 70-10301S combustion turbine is less than or equal to 50 percent of the standard, Eni may continue to use this waiver."

With this letter, EPA is clarifying that if a subsequent performance test result is greater than 50 percent of the NO_x NSPS of 150 ppm, Eni is required to conduct a performance test of each of

Eni US Operating Co. Inc. Oliktok Point Processing Facility
NSPS KKKK Initial and Subsequent Performance Test Waiver - Clarification
April 26, 2012
Page 2 of 2

the remaining Solar Taurus combustion turbines within 60 days of receiving the final test report.
This clarification does not alter the other requirements of NSPS Subparts A and KKKK. If you
have questions regarding this response, please contact Natasha Greaves at (206) 553-7079.

Sincerely,



Krishna Viswanathan, Manager
Federal Delegated & Federal Programs

Enclosure



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

AIR & RADIATION
DIVISION

June 8, 2020

Mr. Larry Burgess
HSE Manager, Alaska
Eni US Operating Company, Inc.
3800 Centerpoint Drive, Suite 300
Anchorage, Alaska 99503

Re: Test Waiver for Turbines Subject to NSPS KKKK at the Oliktok Point Processing Facility

Dear Mr. Burgess:

This is a response to your letter on behalf of Eni US Operating Company, Inc. (Eni) submitted to the U.S. Environmental Protection Agency, Region 10, dated April 28, 2020, requesting a modification to a waiver from ongoing performance testing under 40 CFR part 60 subpart KKKK, *Standards of Performance for Stationary Combustion Turbines* (NSPS KKKK) at the Oliktok Point Processing Facility. Specifically, Eni is requesting that the waiver that allows one of four identical combustion turbines to be tested alternatively to assure compliance with all four units shall continue to apply after “maintenance engine swaps.” We are granting your request as described below.

Background

Eni operates four identical 8.25-megawatt Solar Taurus 70-10301S turbines at the Oliktok Point Processing Facility, Nikaitchuq Development Site, in North Slope Borough. The turbines are identified in the facility’s part 70 operating permit (AQ0923TVP02) issued by the Alaska Department of Environmental Conservation (ADEC) as emission units (EU) 1, 2, 32, and 33. EU 1, 2, and 33 are fired exclusively on fuel gas produced on-site. EU 34 is a dual fuel unit fired on fuel gas or liquid fuel, which, according to condition 27.2, can only be ultra low sulfur diesel.

NSPS KKKK limits emissions of oxides of nitrogen (NO_x) from turbines with an output of less than or equal to 30 megawatts located above the arctic circle to no greater than 150 parts per million (ppm), corrected to 15 percent oxygen. According to 40 CFR 60.4340(a), turbines that do not use water or steam injection to comply with the limit and that have not installed continuous emission monitoring systems or continuous parameter monitoring systems shall demonstrate initial and continuous compliance through source testing. The initial source test must be performed within 60 days of achieving the maximum firing rate, but not later than 180 days after initial startup, and subsequent tests are performed annually thereafter. If NO_x emissions from a source test do not exceed 75 percent of the standard, testing frequency may be reduced to every other year.

On March 15, 2012, the EPA granted a waiver allowing Eni to forego initial testing for EU 32 in addition to one of the other three turbines and to allow like-for-like testing to demonstrate ongoing compliance such that Eni would be allowed to test one turbine to assure compliance with all four. Testing must alternate, such that after four required tests all of the turbines must be tested. Should any test result exceed 50 percent of the NSPS KKKK limit for NO_x, Eni would be required to test the other three turbines within 60 days of receiving the final test report. Once Eni can provide test results at or below 50 percent of the NSPS KKKK limit, Eni may continue to use the waiver.

NO_x Test Results To-date (fired on gas)

EU	Test Date	NO _x (ppm @ 15% O ₂)
1	March 2011	2.6
33	March 2011	5.1
2	May 2012	6.3
32	July 2014	5.2
33	March 2016	8.7
1	April 2018	5.8
2	March 2020	7.7

In your recent letter, you explain that Eni may periodically replace the engine core of a turbine with a tuned and inspected equivalent component. Given the wide margin between tested NO_x concentrations and the 150 ppm NSPS KKKK limit (a margin of greater than 94 percent) you propose that turbines provided as maintenance engine swaps should be covered under the existing test waiver,

Regulatory Background

The EPA has authority to waive a performance test requirement, including an initial performance test, pursuant to the provisions at 40 CFR 60.8(b)(4), if the owner or operator of the source has demonstrated by other means to the Administrator’s satisfaction that the affected facility is in compliance with the standards. According to EPA’s Clean Air Act National Stack Testing Guidance issued on April 27, 2009, a waiver for one or more similar units “may be appropriate on a case-by-case basis when criteria similar to the following are met”:

1. the units are located at the same facility;
2. the units are produced by the same manufacturer, have the same model number or other manufacturer’s designation in common, and have the same rated capacity and operating specifications;
3. the units are operated and maintained in a similar manner; and
4. the delegated agency, based on documentation submitted by the facility:
 - a. determines that the margin of compliance for the identical units tested is significant and can be maintained on an ongoing basis; or
 - b. determines based on a review of sufficient emissions data that, though the margin of compliance is not substantial, other factors allow for the determination that the variability of emissions for identical tested units is low enough for confidence that the untested unit will be in compliance. These factors may include, but are not limited to, the following:
 - (1) historical records at the tested unit showing consistent/invariant load;
 - (2) fuel characteristics yielding low variability, e.g., oil and, therefore, assurance that emissions will be constant and below allowable levels;

- (3) statistical analysis of a robust emissions data set demonstrate sufficiently low variability to convey assurance that the margin of compliance, though small, is reliable.

Determination

Eni has demonstrated to the EPA's satisfaction that the four Solar Taurus 70 turbines identified in the facility's title V permit as EU 1, 2, 32, and 33 can comply with the NO_x standard in NSPS KKKK with a sufficient margin of compliance when fired on fuel gas. The units are located at the same facility and are produced by the same manufacturer with the same model number. Furthermore, you have provided evidence that replacement components will be functionally equivalent and will be maintained and operated in a similar manner to the components they replace and can also comply with the NO_x standard in NSPS KKKK with a sufficient margin of compliance when fired on fuel gas.

For these reasons, we are affirming and amending the waiver granted in 2012 to Eni, effective from the date of this letter, by:

1. Affirming that the waiver applies to any maintenance engine swaps;
2. Allowing the timing between tests to be determined as though no replacement had occurred; and
3. Waiving any initial testing that may be required as a result of replacement.

Any compliance obligation not specifically waived in this letter continues to apply. If you have any questions regarding this letter, please contact Geoffrey Glass at (206) 553-1847 or at glass.geoffrey@epa.gov.

Sincerely,

Kelly McFadden, Manager
Stationary Source Unit

Enclosure

cc: Mr. James Plosay
ADEC (email)

Ms. Jeanette Brena
SLR Consultants (email)

Mr. Chris Lindsey
SLR Consultants (email)

Mr. John Pavitt
EPA, Alaska Operations Office (email)

Ms. Jennifer Curtis
EPA, AOO (email)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

AIR & RADIATION
DIVISION

January 5, 2023

Mr. Larry Burgess
SEQ Manager, Alaska
Eni US Operating Company, Inc.
3800 Centerpoint Drive, Suite 300
Anchorage, Alaska 99503

Re: Test Waiver for Turbine Subject to NSPS KKKK at the Oliktok Point Processing Facility

Dear Mr. Burgess:

This is a response to your letter on behalf of Eni US Operating Company, Inc. (Eni) submitted to the U.S. Environmental Protection Agency, Region 10, dated July 8, 2022, requesting a waiver from ongoing performance testing under 40 CFR part 60 subpart KKKK, *Standards of Performance for Stationary Combustion Turbines* (NSPS KKKK) at the Oliktok Point Processing Facility. Specifically, Eni is requesting a reduced testing frequency for a unit that combusts diesel fuel infrequently. We are conditionally granting your request as described below.

Background

Eni operates four identical 8.25-megawatt Solar Taurus 70-10301S turbines at the Oliktok Point Processing Facility, Nikaitchuq Development Site, in North Slope Borough, Alaska. The turbines are identified in the facility's part 70 operating permit (AQ0923TVP02, January 22, 2020) issued by the Alaska Department of Environmental Conservation as emission units (EU) 1, 2, 32, and 33. EU 1, 2, and 33 are fired exclusively on fuel gas produced locally on the North Slope. EU 32 is a dual fuel unit fired on fuel gas or liquid fuel, which, according to condition 27.2, can only be ultra low sulfur diesel (ULSD). ULSD is delivered commercially from outside North Slope Borough.

According to condition 1.5, EU 32 shall combust gas as the primary fuel with ULSD as a backup fuel. Condition 28 requires Eni to conduct a performance test for EU 32 when operation on ULSD exceeds the limit specified in Table C, which is 600 hours per year.¹

NSPS KKKK limits emissions of oxides of nitrogen (NO_x) from turbines with an output of less than or equal to 30 megawatts located above the Arctic Circle to no greater than 150 parts per million (ppm), corrected to 15 percent oxygen. According to 40 CFR 60.4340(a), turbines that do not use water or steam injection to comply with the limit and that have not installed continuous emission monitoring systems or continuous parameter monitoring systems shall demonstrate initial and continuous compliance through source testing. The initial source test must be performed within 60 days of

¹ A year means a rolling 12-continuous month period. This is clear from the requirements of condition 28 and was confirmed by ADEC staff.

achieving the maximum firing rate, but not later than 180 days after initial startup, and subsequent tests are performed annually thereafter. If NO_x emissions from a source test do not exceed 75 percent of the standard, testing frequency may be reduced to every other year.

Eni provided historical source operations test data for EU 32 when firing ULSD going back to 2013. NO_x emissions, corrected to 15 percent oxygen, vary from 104.0 to 126.4 ppm, or 69.3 to 78.3 percent of the standard.

Table 1: Annual Hours of Operation on ULSD and Test Results for EU 32

	2022	2021	2020	2019	2018	2017	2016	2015		2014	2013
Hours of Operation	TBD	417	20	179	18	19	15	23		88	4
Test Date	03/20		03/18		04/01		05/21	03/25	01/22		11/05
NO _x (ppm @ 15% O ₂)	126.4		105.4		109.0		110.0	116.5	109.9		104.0

Notes:

- (1) The January 2015 test results were invalidated by ADEC for a NO_x converter error.
- (2) Eni reports that for eight days in 2019, Conoco Phillips was working on their gas line and could not deliver fuel to the facility.
- (3) The facility had a planned shutdown in 2021 resulting in increased diesel fuel consumption. The next facility shutdown is not planned for at least the next five years.
- (4) According to an email dated December 14, 2022, EU 32 had operated on diesel fuel for 13 hours in 2022.

According to 40 CFR 60.4400(b)(1), “If the stationary combustion turbine combusts both oil and gas as primary or backup fuels, separate performance testing is required for each fuel.”

Regulatory Basis

The EPA has authority to waive a performance test requirement, including an initial performance test, pursuant to the provisions at 40 CFR 60.8(b)(4), if the owner or operator of the source has demonstrated by other means to the Administrator’s satisfaction that the affected facility is in compliance with the standards. Because the State of Alaska has not requested delegation of NSPS KKKK, the EPA remains the Administrator for this subpart.

Determination

Eni has demonstrated to the EPA’s satisfaction that EU 32 has consistently, and with low variability, met the NO_x emission limit in NSPS KKKK when fired on ULSD and only operates on ULSD infrequently as a backup fuel. Therefore, the EPA is granting Eni’s request to waive annual (or biennial) testing of EU 32 as required by 40 CFR 60.4340(a), effective immediately, provided the following conditions are met:

1. A performance test shall be performed in accordance with 40 CFR 60.4400 to demonstrate continuous compliance with the NO_x emission limit in Table 1 of NSPS KKKK for EU 32 when fired on ULSD not later than the earlier of the following dates:
 - a. Five years (60 months) after the previous performance test, or
 - b. If cumulative operation of EU 32 on ULSD since the previous performance test exceeds 600 hours, the later of the following dates:

- i. Within 180 days after the end of the calendar month during which the cumulative operation of EU 32 on ULSD since the previous performance test exceeds 600 hours, or
 - ii. when a performance test would have been required by 40 CFR 60.4340(a) (within 14 or 26 months).
2. The results of any performance test performed pursuant to condition 1 of this waiver may be used to demonstrate continuous compliance with the NO_x emission limit in Table 1 of NSPS KKKK for EU 32 only when the unit is fired on ULSD.
3. A written report of the results of each performance test conducted pursuant to condition 1 of this waiver shall be submitted to the EPA before the close of business on the 60th day following the completion of the performance test. Written reports shall contain the information specified in 40 CFR 60.8(f)(2).
4. Test reports and notifications submitted to the EPA pursuant to condition 1 of this waiver shall be submitted via the EPA's Compliance and Emission Data Reporting Interface (CEDRI). CEDRI can be accessed through the EPA's Central Data Exchange at <https://cdx.epa.gov>.
5. This waiver will automatically terminate if the NO_x emission result from a performance test for EU 32 when fired on ULSD exceeds the NO_x emission limit in Table 1 of NSPS KKKK.

Any compliance obligation not specifically waived in this letter continues to apply. Nothing in this letter prevents the EPA from requiring additional testing under section 114 of the Clean Air Act or ADEC from requiring additional testing under its state authority.

If you have any questions regarding this letter, please contact Geoffrey Glass at (206) 553-1847 or at glass.geoffrey@epa.gov.

Sincerely,

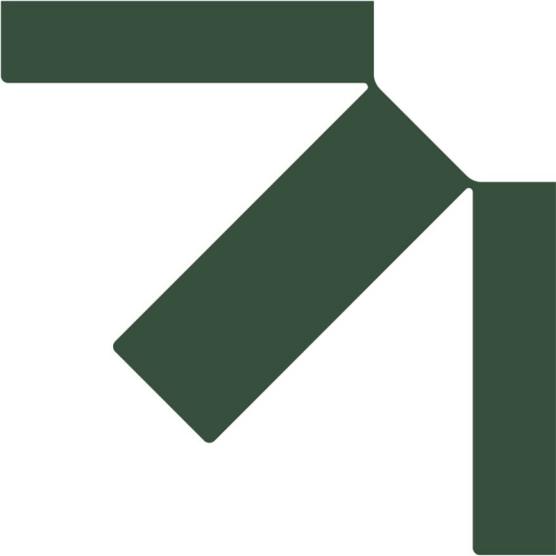
Karl Pepple, Acting Manager
Air Permits and Toxics Branch

Enclosure

cc: Mr. James Plosay
ADEC

Ms. Grace Germain
ADEC

Mr. Chris Lindsey
SLR Consultants



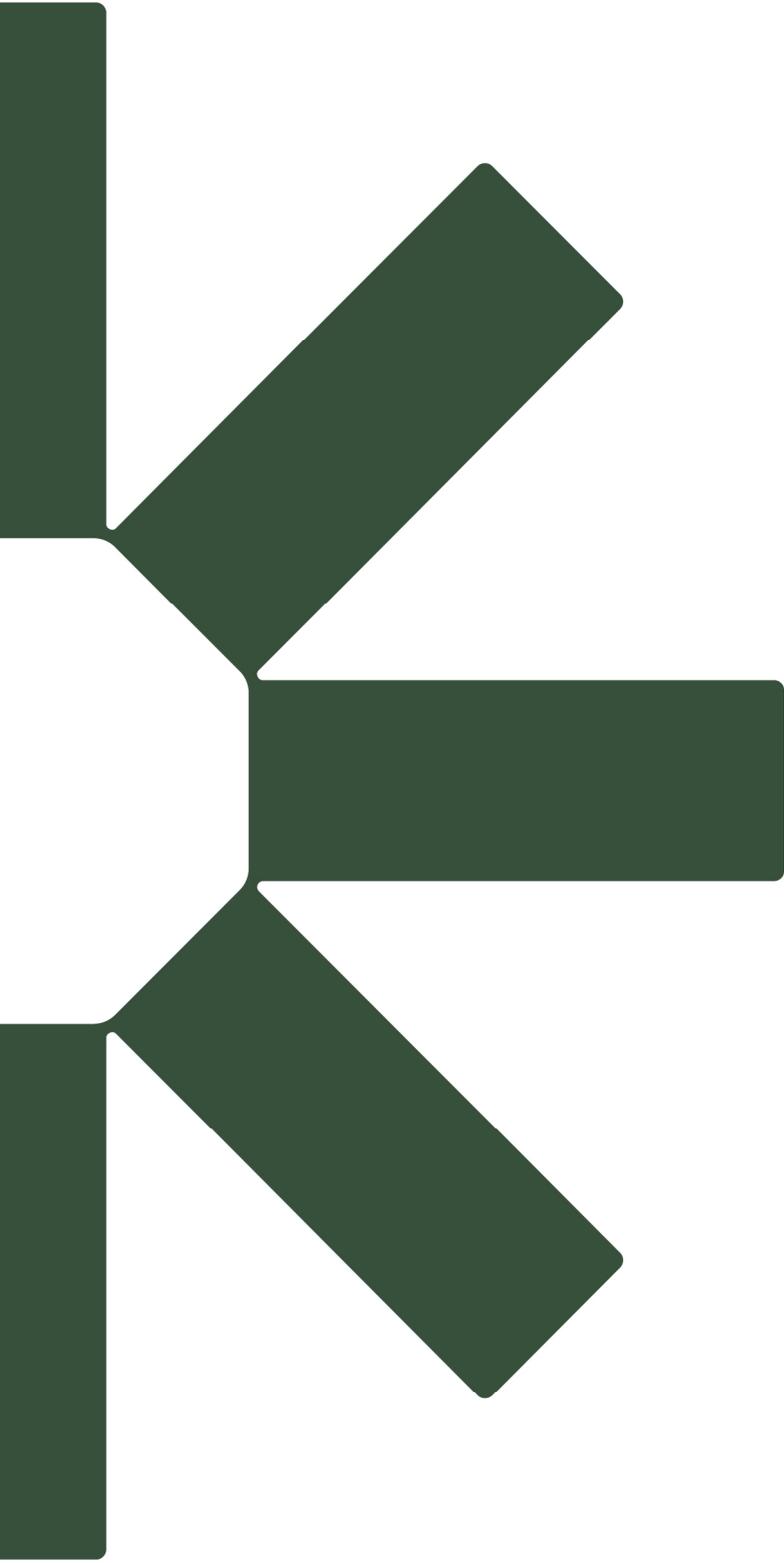
Appendix F *Permits – Not Applicable*

Application Revision for Renewal of an Air Quality Title V Operating Permit

Nikaitchuq Development

Eni US Operating Co. Inc.

September 30, 2024



Making Sustainability Happen