Joshua,

Please see Hilcorp responses below. Please let me know if you have any follow up questions.

Thank you,
Drew

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From: Klina, Joshua J (DEC) <joshua.klina@alaska.gov>
Sent: Monday, August 5, 2024 2:30 PM
To: Drew Anderson <ananderson@hilcorp.com>
Subject: Information Request; AQ0067TVP04A; Hilcorp's Monopod Platform

Hello Drew Anderson,

I am currently working on the draft for the Title V renewal of Operating Permit No. AQ0067TBP03. While going through the permit, I have found several items that I wanted to get additional clarification on.

Here are my questions:

1. In Operating Permit No. AQ0067TVP03, Condition 31.6 requires the Permittee to install a non-resettable hour meter prior to startup of the engine. This condition cites 40 C.F.R. 60.4209(a), Subpart IIII. 40 C.F.R. 60.4209(a) reads as follows,

    a. If you are an owner or operator of an emergency stationary CI internal combustion engine that does <mark>not meet the standards applicable to non-emergency engines</mark>, you must install a non-resettable hour meter prior to startup of the engine.

    Could you confirm whether EU ID 23a does or does not meet the standards applicable to non-emergency engines?

Hilcorp Response: EU ID 23a is a 2013 model year, 685 hp engine certified to Tier 3. For Subpart IIII applicability, EU ID 23a is non-emergency since Hilcorp opts to use the relaxed provision under 40 CFR 60.4216(c) for stationary CI ICE located in remote Alaska, similar to EU IDs 8a, 9a, and 10a. As such, EU ID 23a is not required to have a non-resettable hour meter nor is it subject to the hour limits for emergency engines under Subpart IIII. Hilcorp would like the Title V renewal permit to account for this correction for EU ID 23a.

2. In the Statement-of-Basis (SOB) of Operating Permit No. AQ0067TVP03, it states "the Permittee is also subject to [Condition 24 of AQ067TVP03] at such other times as may be required by EPA for EU IDs 1, 2, 8a, 9a, 10a, 23a, and 26." Condition 24 or AQ0067TVP03 addresses 40 C.F.R. 60.8 (Performance Tests). In Table 8 of NSPS Subpart IIII, it states that 40 C.F.R. 60.8 applies to NSPS Subpart IIII, "except that 40 C.F.R. 60.8 only applies to stationary CI ICE with a displacement of greater than 30 liters per cylinder and engines that are not certified. Are any of EU IDs 8a, 9a, 10a, and 23a characterized as CI ICE with a displacement of greater than 30 liters per cylinder and/or not certified?

Hilcorp Response: 40 CFR 60.8 (Performance Test) does not apply EU IDs 8a, 9a, 10a, or 23a. These units are all certified engines and do not have a displacement greater than 30 liters per cylinder.

3. Condition 19 of AQ0067TVP03 contains requirements that limit the fuel consumption of EU IDs 13 and 14. These fuel consumption limits are on a rolling 12 month averaging period. While there is a fuel consumption limit, there does not seem to be a method of tracking specified by the permit. How has Hilcorp been tracking the fuel consumption of each of EU IDs 13 and 14.

Hilcorp Response: EU IDs 13 and 14 currently operate with fuel flow meters on the fueling station. Hilcorp does not think ADEC should add this as a gap-fill requirement, giving Hilcorp the option to use alternate means of monitoring for fuel if there are issues with the fuel flow meters. This level of flexibility was provided during the permitting process for Construction Permit No. 067CP01.

4. In Condition 13.1 or AQ0067TVP03, it requires the Permittee to "install and operate a data acquisition system capable of logging the following parameters for EU ID 26 at intervals of no greater than every three minutes: (a) status of SoLoNOx mode (active or inactive), and (b) the inlet air temperature of EU Id 26 in degrees Fahrenheit (°F)." Can you describe the data acquisition system that would be installed? Such as the physical system itself (such as a computer connected to thermocouples?), manufacturer, and whether their would be a maintenance procedures from the manufacturer? Would EU ID 26 come with this data acquisition system already installed?

Additionally, if any manufacturer or vendor information for the data acquisition system is available, it would be helpful to receive that with your response. Although, I understand that EU ID 26 has not been installed yet, and, consequently, you probably would not have that

information.

Hilcorp Response: EU ID 26 has not yet been procured so additional information is unavailable.

If you have any questions or concerns, please let me know.

Thanks,

Joshua Klina

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Engineering Assistant II

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