DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit: AQ0272MSS03 Preliminary Date – December 23, 2024

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit AQ0272MSS03 to the Permittee listed below.

Permittee:	**Hilcorp North Slope, LLC** 3800 Centerpoint Dr., Suite 1400 Anchorage, AK 99503
Stationary Source:	**Lisburne Production Center (LPC)**
Location:	Latitude: 70º 17’ 6.3” North; Longitude: 148º 25’ 54.3” West
Project:	LPC Rich Gas Compressor Project
Permit Contact:	Emilie Niedermeyer – Environmental Specialist, (907) 564-4332 emilie.niedermeyer@hilcorp.com

The Permittee submitted an application for Minor Permit AQ0272MSS03 under 18 AAC 50.508(5) for Owner Requested Limits (ORLs) to avoid Prevention of Significant Deterioration (PSD) review under 18 AAC 50.306 for oxides of nitrogen (NO_x).

This permit satisfies the obligation of the Permittee to obtain a minor permit under 18 AAC 50. As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this permit.

James R. Plosay, Manager
Air Permits Program

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Abbreviations and Acronyms

AAAQS.....Alaska Ambient Air Quality Standards
AAC.....Alaska Administrative Code
ADEC.....Alaska Department of Environmental Conservation
AFR.....air fuel ratio
AOS.....Air Online Services
AS.....Alaska Statutes
ASTM.....American Society for Testing and Materials
BAE.....baseline actual emissions
BACT.....best available control technology
bhp.....brake horsepower
CDX.....Central Data Exchange
CEDRI.....Compliance and Emissions Data Reporting Interface
C.F.R.....Code of Federal Regulations
CAA.....Clean Air Act
CO.....carbon monoxide
Department.....Alaska Department of Environmental Conservation
dscf.....dry standard cubic foot
EF.....emission factor
EICO.....CO emission factor at site conditions
$EINO_x$.....NO_x emission factor at site conditions
EPA.....US Environmental Protection Agency
EU.....emissions unit
F_d.....calculated volume of dry combustion products per unit of heat content at stoichiometric conditions based on LPC fuel composition and lower heating value
gr/dscf.....grain per dry standard cubic foot (1 pound = 7000 grains)
gph.....gallons per hour
HAPs.....hazardous air pollutants [as defined in AS 46.14.990]
hp.....horsepower
ID.....emissions unit identification number
ISO.....International Standards Organization
kPa.....kiloPascals
LAER.....lowest achievable emission rate
LHV.....lower heating value
LPC.....Lisburne Production Center
MACT.....maximum achievable control technology [as defined in 40 C.F.R. 63]
MWe.....megawatts (electric)
MMBtu/hr.....million British thermal units per hour
MMscf.....million standard cubic feet
MR&R.....monitoring, recordkeeping, and reporting
NESHAPs.....National Emission Standards for Hazardous Air Pollutants [as contained in 40 C.F.R. 61 and 63]
NO_x.....nitrogen oxides
NRE.....nonroad engine
NSR.....new source review
NSPS.....New Source Performance Standards [as contained in 40 C.F.R. 60]
O & M.....operation and maintenance
O_2.....oxygen
PAL.....plantwide applicability limitation
PM_{10}.....particulate matter less than or equal to a nominal 10 microns in diameter
$PM_{2.5}$.....particulate matter less than or equal to a nominal 2.5 microns in diameter
ppm.....parts per million
ppmv, ppmvd.....parts per million by volume on a dry basis
psia.....pounds per square inch (absolute)
PSD.....prevention of significant deterioration
PAE.....projected actual emissions
PTE.....potential to emit
SER.....Significant Emissions Rate
SIC.....Standard Industrial Classification
SIP.....State Implementation Plan
SPC.....Standard Permit Condition or Standard Operating Permit Condition
SO_2.....sulfur dioxide
The Act.....Clean Air Act
TPH.....tons per hour
TPY.....tons per year
VOC.....volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
VOL.....volatile organic liquid [as defined in 40 C.F.R. 60.111b, Subpart Kb]
vol%.....volume percent
wt%.....weight percent
$wt\%S_{fuel}$.....weight percent of sulfur in fuel

Section 1 Emissions Unit Inventory

Emissions Unit (EU) Authorization. The Permittee is authorized to install and operate the EUs listed in Table 1 in accordance with the terms and conditions of this permit. The information in Table 1 is for identification purposes only, unless otherwise noted in the permit. The specific EU descriptions do not restrict the Permittee from replacing an EU identified in Table 1.

Table 1 – EU Inventory[1]

EU ID[2]	EU Description	Make/Model	Fuel	Rating/Max Capacity	Construction Date
6	Electric Generator Turbine	Solar Mars GSC T-12000	Fuel Gas	12,000 hp, ISO	1986
7	Electric Generator Turbine	Solar Mars GSC T-12000	Fuel Gas	12,000 hp, ISO	1986
8	Electric Generator Turbine	Solar Mars GSC T-12000	Fuel Gas	12,000 hp, ISO	1986
9	Electric Generator Turbine	Solar Mars GSC T-12000	Fuel Gas	12,000 hp, ISO	1986
Upgraded EUs[2]					
6A	Electric Generator Turbine	Solar Mars 90-13000S SoLoNOx	Fuel Gas	13,000 hp, ISO	February 1, 2025[3]
7A	Electric Generator Turbine	Solar Mars 90-13000S SoLoNOx	Fuel Gas	13,000 hp, ISO	March 1, 2025[3]

Notes:

1. Only the EUs affected by the ORLs established under this minor permit appear in Table 1.
2. Each of EU IDs 6 and 7 will be upgraded to a SoLoNOx turbine in accordance with Condition 9.
3. Construction date is tentative and may change based on project schedule.

1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing an upgraded EU, including any applicable minor or construction permit requirements**.**

2. Upon completion of the SoLoNOx upgrade on each of EU ID 6 and EU ID 7,

2.1 EU ID 6 and EU ID 7 shall be referred to as EU ID 6A and EU ID 7A, respectively; and

2.2 all references to EU ID 6 and EU ID 7 in the stationary source's current Title V Operating Permit AQ0272TVP02 Revision 3 shall be replaced by EU ID 6A and EU ID 7A, respectively.

Section 2 Fee Requirements

3. Fee Requirements. The Permittee shall pay to the Department all assessed permit fees. Fee rates are set out in 18 AAC 50.400 – 499.

4. Assessable Emissions. For each period from July 1 through the following June 30, the Permittee shall pay to the Department annual emission fees based on the stationary source's assessable emissions as determined by the Department under 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. The quantity for which fees will be assessed is the lesser of the stationary source's:

4.1 potential to emit of 3,391.87 TPY; or

4.2 projected annual rate of emissions, in TPY, based upon actual annual emissions for the most recent calendar year, or another 12-month period approved in writing by the Department, when demonstrated by credible evidence of actual emissions, based upon the most representative information available from one or more of the following methods:

a. an enforceable test method described in 18 AAC 50.220;

b. material balance calculations;

c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or

d. other methods and calculations approved by the Department, including appropriate vendor-provided emissions factors when sufficient documentation is provided.

5. Assessable Emission Estimates. The Permittee shall comply as follows:

5.1 No later than March 31 of each year, the Permittee may submit an estimate of the stationary source's assessable emissions as determined in Condition 4.2. Submit actual emissions estimates in accordance with the submission instructions on the Department's Standard Permit Conditions web page at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-i-submission-instructions/.

5.2 The Permittee shall include with the assessable emissions report all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.

5.3 If no estimate or waiver letter 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 set out in Condition 4.1.

Section 3 State Emission Standards

6. Industrial Process and Fuel-Burning Equipment Visible Emissions. The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 6A and 7A in Table 1 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

6.1 For EU IDs 6A and 7A, burn only gas as fuel.

a. In the operating report required by Condition 31, indicate whether each of these emission units burned only gas during the period covered by the report.

b. Report under excess emissions and permit deviation report as described in Condition 30 if any fuel other than gas is burned in any of these emissions units.

7. Industrial Process and Fuel-Burning Equipment PM Emissions. The Permittee shall not cause or allow particulate matter emitted from EU IDs 6A and 7A in Table 1 to exceed 0.05 grains per dry standard cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

7.1 For EU IDs 6A and 7A, burn only gas as fuel.

a. In the operating report required by Condition 31, indicate whether each of these emission units burned only gas during the period covered by the report.

b. Report under the excess emissions and permit deviation report described in Condition 30 if any fuel other than gas is burned in any of these emissions units.

8. Sulfur Compound Emissions. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO_2 from EU IDs 6A and 7A in Table 1 to exceed 500 parts per million (ppm) averaged over three hours.

Section 4 Owner Requested Limits

Requirements to Avoid PSD Review under 18 AAC 50.306 for NO_x

9. Upgrading of Combustion Turbines with SoLoNOx Control. To limit NO_x emissions from the LPC power plant combustion turbines resulting from the Rich Gas Compressor Project, the Permittee shall upgrade each of the existing Solar Mars GSC T-12000 Electric Generator turbines (EU IDs 6 and 7) with a Solar Mars 90-13000S SoLoNOx unit.

9.1 Until one of the existing turbines (EU ID 6 or EU ID 7) is upgraded with a Solar Mars 90-13000S SoLoNOx, the Permittee shall:

a. ensure that the rich gas compressor motor is not connected to the LPC internal power bus; and

b. include in the operating report required by Condition 31, a statement certifying that the rich gas compressor motor was not connected to the LPC internal power bus.

9.2 Keep records of the following:

a. the date and EU ID each time one of EU IDs 6 and 7 is upgraded with a Solar Mars 90-13000S SoLoNOx unit; and

b. the date when the upgraded SoLoNOx turbine is available for base load generation.

9.3 Include the information recorded under Condition 9.2 in the first operating report required by Condition 31 following completion of the upgrade for each of EU IDs 6 and 7.

9.4 Report under the excess emissions and permit deviation report described in Condition 30 if any of the requirements in Conditions 9.1 through 9.3 are not met.

10. Operational Load Requirements. Once the Solar Mars 90-13000S SoLoNOx turbines (EU IDs 6A and 7A) become fully operational, the Permittee shall maintain the operating load of each EU above 50% at all times during normal operations (i.e., online at rated temperature range with no malfunction status indicated). Monitor, record, and report as follows:

10.1 Capture the hourly average load for the turbine during all periods of operation. For each calendar day, record the lowest hourly average load for the turbine during normal operations.

10.2 Include in the operating report required by Condition 31, a statement certifying that the operating load of each of EU ID 6A and 7A is above 50% at all times during normal operations, or a copy of the excess emissions and permit deviation report required in Condition 10.3 as applicable, for the period covered by the report.

10.3 Report under the excess emissions and permit deviation report described in Condition 30 anytime the hourly average operating load of the EU does not meet Condition 10, or if any of the requirements in Conditions 10.1 or 10.2 are not met.

11. Operational Hour Requirements. Once each of the Solar Mars 90-13000S SoLoNOx turbines (EU IDs 6A and 7A) become fully operational, the Permittee shall ensure the total hours operated by the EUs during normal operations (i.e., online at rated temperature range with no malfunction status indicated) is at least 75% of the total LPC power plant generation hours on an annual basis. Monitor, record, and report as follows:

11.1 By the end of each calendar month, calculate and record:

a. the total hours operated by EU IDs 6A and 7A;

b. the total generation hours of the LPC power plant;

c. the sum of the last 12 consecutive monthly records for Conditions 11.1a and 11.1b; and

d. the combined total hours operated by EU IDs 6A and 7A for the rolling consecutive 12-month period, as a percentage of the total generation hours of the LPC power plant according to the following formula:

$$Operating\ \%\ of\ the\ upgraded\ EUs = \sum_{12\ months} \frac{Condition\ 11.1a}{Condition\ 11.1b} * 100$$

11.2 Include in the operating report required by Condition 31, the records required by Condition 11.1 for the period covered by the report.

11.3 Report under excess emissions and permit deviation report described in Condition 30 if the operational hour percentage of the upgraded turbines (as calculated in Condition 11.1d) does not meet Condition 11, or if any of the requirements in Conditions 11.1 or 11.2 are not met.

12. Operating Modes. The Permittee shall ensure that EU IDs 6A and 7A do not operate concurrently, including sharing load between transitions.[1] Monitor, record, and report as follows.

12.1 By the end of each calendar month, record the dates and times that EU IDs 6A and/or 7A start and stop, as applicable.

12.2 Include in the operating report required by Condition 31, the records required by Condition 12.1.

12.3 Report under excess emissions and permit deviation report described in Condition 30 if the start and stop times of EU IDs 6A and 7A (as recorded in Condition 12.1) overlap, or if any of the requirements in Conditions 12.1 or 12.2 are not met.

13. Continued Compliance Requirements for PSD major classification avoidance and protection of Alaska Ambient Air Quality Standards (AAAQS). For EU IDs 6A and 7A, the Permittee shall continue to comply with all the EU-specific limits and MR&R requirements associated with the corresponding EU IDs 6 and 7 before the upgrade, as

[1] Transition is only allowed during the following load sharing scenarios: 1) EU IDs 8 and 9 or 2) EU IDs 6A or 7A with EU IDs 8 or 9.

described in the applicable operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50.

Section 5 Federal Requirements

40 C.F.R. Part 60 New Source Performance Standards (NSPS)

NSPS Subpart A – General Provisions

14. Upon completion of the SoLoNOx upgrade on each of EU IDs 6 and 7, all conditions under NSPS Subpart A section in the stationary source's Title V Operating Permit AQ0272TVP02 Revision 3 will no longer apply to EU IDs 6 and 7. NSPS Subpart A requirements provided in Conditions 15 through 22 of this minor permit apply to the SoLoNOx upgraded EU IDs 6A and 7A.

15. NSPS Subpart A Notification. Unless exempted by a specific subpart, for any affected facility[2] or existing facility[3] regulated under NSPS requirements in 40 C.F.R. 60, the Permittee shall furnish the Administrator[4] written notification or, if acceptable to both the EPA and the Permittee, electronic notification, as follows:

[18 AAC 50.035 & 50.040(a)(1)]
[40 C.F.R. 60.7(a) & 60.15(d), Subpart A]

15.1 a notification of the date construction (or reconstruction as defined under 40 C.F.R. 60.15) of an affected facility is commenced postmarked no later than 30 days after such date. This requirement shall not apply in the case of mass-produced facilities which are purchased in completed form;

[40 C.F.R. 60.7(a)(1), Subpart A]

15.2 a notification of the actual date of initial startup of an affected facility postmarked within 15 days after such date;

[40 C.F.R. 60.7(a)(3), Subpart A]

15.3 a notification of 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). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include[5]

a. information describing the precise nature of the change,

b. present and proposed emission control systems,

c. productive capacity of the facility before and after the change, and

d. the expected completion date of the change;

[40 C.F.R. 60.7(a)(4), Subpart A]

[2] *Affected facility* means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 C.F.R. 60.2.
[3] *Existing facility* means, with reference to a stationary source, any apparatus of the type for which a standard is promulgated in 40 C.F.R. Part 60, and the construction or modification of which was commenced before the date of proposal of that standard; or any apparatus which could be altered in such a way as to be of that type, as defined in 40 C.F.R. 60.2.
[4] The Department defines the "the Administrator" to mean "the EPA and the Department."
[5] The Department and EPA may request additional relevant information subsequent to this notice.

15.4 a notification of the anticipated date for conducting the opacity observations required by 40 C.F.R. 60.11(e)(1). The notifications shall also include, if appropriate, a request for the EPA to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date;

[40 C.F.R. 60.7(a)(6), Subpart A]

15.5 a notification of any proposed replacement of components at 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, and including the following information:

[40 C.F.R. 60.15(d), Subpart A]

a. the name and address of owner or operator,

b. the location of the existing facility,

c. a brief description of the existing facility and the components that are to be replaced,

d. a description of the existing and proposed air pollution control equipment,

e. an estimate of the fixed capital cost of the replacements, and of constructing a comparable entirely new facility,

f. the estimated life of the existing facility after the replacements, and

g. a discussion of any economic or technical limitations the facility may have in complying with the applicable standards of performance after the proposed replacements.

16. NSPS Subpart A Startup, Shutdown, & Malfunction Requirements. The Permittee shall maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of EU IDs 6A and 7A, any malfunction of the air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for EU IDs 6A and 7A is inoperative.

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.7(b), Subpart A]

17. NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report. The Permittee shall submit excess emissions and monitoring systems performance (EEMSP)[6] report and/or summary report form (see Condition 18) to the Administrator semiannually, except when more frequent reporting is specifically required by an applicable subpart; or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information:

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.7(c), Subpart A]

17.1 the date and time of commencement and completion of each time period of excess emissions, and the process operating time during the reporting period; and

[40 C.F.R. 60.7(c)(1), Subpart A]

17.2 specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of EU IDs 6A and 7A; the nature and cause of any malfunction (if known), and the corrective action taken or preventative measures adopted.

[40 C.F.R. 60.7(c)(2), Subpart A]

17.3 When no excess emissions have occurred, such information shall be stated in the report.

[40 C.F.R. 60.7(c)(4), Subpart A]

18. NSPS Subpart A Summary Report Form. The Permittee shall submit to the Department and to EPA one "summary report form" in the format shown in Figure 1 of 40 C.F.R. 60.7 (see ATTACHMENT A) for each pollutant monitored for EU ID(s) 6A and 7A. The report shall be submitted semiannually, postmarked by the 30th day following the end of each six-month period, except when more frequent reporting is specifically required by an applicable subpart or the EPA, as follows:

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.7(c) & (d), Subpart A]

18.1 If the total duration of excess emissions for the reporting period is less than one percent of the total operating time for the reporting period and CMS downtime for the reporting period is less than five percent of the total operating time for the reporting period, submit a summary report form **unless** the EEMSP report described in Condition 17 is requested.

[40 C.F.R. 60.7(d)(1), Subpart A]

[6] The federal EEMSP report is not the same as the state excess emission report required by Condition 30. Excess emissions are defined in applicable subparts.

18.2 If the total duration of excess emissions for the reporting period is one percent or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is five percent or greater of the total time for the reporting period, then submit a summary report form **and the EEMSP report** described in Condition 17.

[40 C.F.R. 60.7(d)(2), Subpart A]

19. NSPS Subpart A Recordkeeping. For EU IDs 6A and 7A, the Permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 C.F.R. Part 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years, in accordance with the applicable operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50, following the date of such measurements, maintenance, reports, and records.

[18 AAC 50.040(a)(1) & (j)(4)]
[40 C.F.R. 71.6(a)(3)(ii)(B)]
[40 C.F.R. 60.7(f), Subpart A]

20. NSPS Subpart A Performance (Source) Tests. The Permittee shall conduct source tests according to the applicable operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50 and as required in this condition on any affected facility.

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.8(a) – (f), Subpart A]

20.1 Except as specified in 40 C.F.R. 60.8(a)(1),(a)(2), (a)(3), and (a)(4), within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, or at such other times specified by 40 C.F.R. Part 60, and at such other times as may be required by the Administrator, the Permittee shall conduct performance test(s) and furnish EPA and the Department a written report of the results of such performance test(s).

[40 C.F.R. 60.8(a), Subpart A]

20.2 Conduct source tests and reduce data as set out in 40 C.F.R. 60.8(b), and provide the Department copies of any EPA waivers or approvals of alternative methods.

[40 C.F.R. 60.8(b), Subpart A]

20.3 Conduct source tests under conditions specified by EPA to be based on representative performance of EU IDs 6A and 7A. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 C.F.R. 60.8(c), Subpart A]

20.4 Provide the EPA and the Department at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the EPA and the Department the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the Permittee shall notify the EPA and the Department as soon as possible of any delay in the original test date, either by providing at least 7 days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the EPA and the Department by mutual agreement.

[40 C.F.R. 60.8(d), Subpart A]

20.5 Provide or cause to be provided, performance testing facilities as follows:

a. Sampling ports adequate for test methods applicable to EU IDs 6A and 7A. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow during performance tests, as demonstrated by applicable test methods and procedures;

b. Safe sampling platform(s);

c. Safe access to sampling platform(s); and

d. Utilities for sampling and testing equipment.

[40 C.F.R. 60.8(e), Subpart A]

20.6 Unless otherwise specified in the applicable subpart, each performance test shall consist of three separate runs using the applicable test method.

a. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply.

b. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances, beyond the owner or operator's control, compliance may, upon the EPA's approval, be determined using the arithmetic mean of the results of the two other runs.

c. Unless otherwise specified in a relevant standard or test method, or as otherwise approved by the Administrator in writing, the report for a performance test shall include the elements identified in 40 C.F.R. 60.8(f)(2)(i) through (vi).

[40 C.F.R. 60.8(f), Subpart A]

21. 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 26 and 27, nothing in 40 C.F.R. Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU IDs 6A and 7A would have been in compliance with applicable requirements of 40 C.F.R. Part 60 if the appropriate performance or compliance test or procedure had been performed.

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.11(g), Subpart A]

22. 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 a standard set forth in Conditions 26 and 27. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[18 AAC 50.040(a)(1)]
[40 C.F.R. 60.12, Subpart A]

NSPS Subpart KKKK – Stationary Combustion Turbines (EU IDs 6A and 7A)[7]

23. Upon completion of the SoLoNOx upgrade on each of EU IDs 6 and 7, all conditions under NSPS Subpart GG section in the stationary source's Title V Operating Permit AQ0272TVP02 Revision 3 will no longer apply to EU IDs 6 and 7. NSPS Subpart KKKK requirements provided in Conditions 24 through 27 of this minor permit apply to the SoLoNOx upgraded EU IDs 6A and 7A.

24. NSPS Subpart KKKK Applicability. For EU IDs 6A and 7A, the Permittee shall comply with the applicable requirements for stationary combustion turbines with a heat input a 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.

[18 AAC 50.040(a)(2)(QQ), (j)(4), & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
[40 C.F.R. 60.4305(a), Subpart KKKK]

25. NSPS Subpart KKKK General Compliance Requirements. Demonstrate compliance as follows:

25.1 Operate and maintain EU IDs 6A and 7A in a manner consistent with good air pollution control practice for minimizing emissions at all times including startup, shutdown, and malfunction.

[18 AAC 50.040(j)(4) & 50.326(j)]
[40 C.F.R. 60.4333(a), Subpart KKKK]

26. NSPS Subpart KKKK NO_x Standard. For each of EU IDs 6A and 7A, turbines located north of the Arctic Circle (latitude 66.5 degrees north), the Permittee shall meet the NO_x emissions limit of 150 ppmv at 15 percent O_2 or 1,100 ng/J of useful output (8.7 lb/MWh).

[7] The provisions of NSPS Subpart KKKK listed in Conditions 24 through 27 are current as amended through December 7, 2020. 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.

[18 AAC 50.040(a)(2)(QQ), 50.040(j)(4), & 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
[40 C.F.R. 60.4320(a) & Table 1 (Line 12), Subpart KKKK]

26.1 **NO_x Monitoring.** The Permittee shall conduct an initial NO_x performance test as required by Conditions 20 and 26.2. Subsequent NO_x performance tests shall be conducted on an annual basis (no more than 14 calendar months following the previous performance test) in accordance with Condition 26.2 to demonstrate continuous compliance, except as follows:

[40 C.F.R. 60.4400(a), Subpart KKKK]

a. If the NO_x emission result from the performance test is less than or equal to 75 percent of the NO_x emission limit in Condition 26, the Permittee may reduce the frequency of the subsequent performance tests to once every 2 years (no more than 26 calendar months following the previous performance test)

b. If the results of any subsequent performance test exceed 75 percent of the NO_x emission limit in Condition 26, the Permittee must resume annual performance tests.

[40 C.F.R. 60.4340(a), Subpart KKKK]

26.2 **NO_x Performance Testing Requirements.** The Permittee shall conduct NO_x performance tests, as required by Condition 26.1, as follows:

[40 C.F.R. 60.4400, Subpart KKKK]

a. The Permittee may use either one of the two methodologies described below in Condition 26.2a(i) or 26.2a(ii) to conduct a performance test. For each test run:

(i) Measure the NO_x concentration (in ppm), using EPA Method 7E or EPA Method 20 in Appendix A of 40 C.F.R 60. For units complying with the output based standard, concurrently measure the stack gas flow rate, using EPA Methods 1 and 2 in Appendix A of 40 C.F.R 60, and measure and record the electrical and thermal output from the unit. Then, use the following equation to calculate the NO_x emission rate:

$$E = \frac{\left(1.194 \times 10^{-7}\right) \times (NO_x)_c \times (Q_{std})}{P}$$

Where:

E	=	NO_x emission rate, in lb/MWh
1.194×10^{-7}	=	conversion constant, in lb/(dscf-ppm)
NO_x	=	average NO_x concentration for the run, in ppm
Q_{std}	=	stack gas volumetric flow rate, in dcf/hr
P	=	gross electrical and mechanical energy output of the combustion turbine, in MW (for simple-cycle operation), for combined-cycle operation, the sum of all electrical and mechanical output from the combustion and steam

turbines, or, for combined heat and power operation, the sum of all electrical and mechanical output from the combustion and steam turbines plus all useful recovered thermal output not used for additional electric or mechanical generation, in MW, calculated according to 40 C.F.R. 60.4350(f)(2); or

(ii) Measure the NO_x and diluent gas concentrations, using either EPA Methods 7E and 3A, or EPA Method 20 in Appendix A of 40 C.F.R. 60. Concurrently measure the heat input to the unit, using a fuel flow meter(s), and measure the electrical and thermal output of the unit. Use EPA Method 19 in Appendix A of 40 C.F.R. 60 to calculate the NO_x emission rate in lb/MMBtu. Then, use Equations 1 and, if necessary, 2 and 3 in 40 C.F.R. 60.4350(f) to calculate the NO_x emission rate in lb/MWh.

[40 C.F.R. 60.4400(a)(1)(i) & (ii), Subpart KKKK]

b. Sampling traverse points for NO_x and (if applicable) diluent gas are to be selected following EPA Method 20 or EPA Method 1 (non-particulate procedures), and sampled for equal time intervals. The sampling must be performed with a traversing single-hole probe, or, if feasible, with a stationary multi-hole probe that samples each of the points sequentially. Alternatively, a multi-hole probe designed and documented to sample equal volumes from each hole may be used to sample simultaneously at the required points.

[40 C.F.R. 60.4400(a)(2), Subpart KKKK]

c. Notwithstanding Condition 26.2b, test at fewer points than are specified in EPA Method 1 or EPA Method 20 in Appendix A 40 C.F.R. 60 if the following conditions are met:

(i) Perform a stratification test for NO_x and diluent pursuant to the procedures specified in Section 6.5.6.1(a) through (e) of Appendix A of 40 C.F.R. 75;

(ii) Once the stratification sampling is completed, use the following alternative sample point selection criteria for the performance test:

(A) If each of the individual traverse point NO_x concentrations is within ±10 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±5 ppm or ± 0.5 percent CO_2 (or O_2) from the mean for all traverse points, then you may use three points (located either 16.7, 50.0 and 83.3 percent of the way across the stack or duct, or, for circular stacks or ducts greater than 2.4 meters (7.8 feet) in diameter, at 0.4, 1.2, and 2.0 meters from the wall). The three points must be located along the measurement line that exhibited the highest average NO_x concentration during the stratification test; or

(B) Sample at a single point, located at least 1 meter for the stack wall or at the stack centroid if each of the individual traverse point NO_x concentrations is within ±5 percent of the mean concentration for all traverse points, or the individual traverse point diluent concentrations differs by no more than ±3 ppm or ±0.3 percent CO_2 (or O_2) from the mean for all traverse points.

[40 C.F.R. 60.4400(a)(3)(i), (ii)(A), & (ii)(B), Subpart KKKK]

d. The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load.

(i) The Permittee may perform testing at the highest achievable load point, if at least 75 percent of peak load cannot be achieved in practice; and

(ii) The Permittee must conduct three separate test runs for each performance test at a minimum time of 20 minutes per run.

(iii) The ambient temperature must be greater than 0 °F during the performance test.

[40 C.F.R. 60.4400(b) & (b)(6), Subpart KKKK]

e. Compliance with the applicable emission limit in Condition 26 must be demonstrated at each tested load level. Compliance is achieved if the three-run arithmetic average NO_x emission rate at each tested level meets the applicable emission limit in Condition 26.

[40 C.F.R. 60.4400(b)(4), Subpart KKKK]

26.3 **Recordkeeping.** The Permittee shall keep records of all performance tests in the applicable operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50.

[18 AAC 50.040(j) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(ii) & (c)(6)]

26.4 **Reporting.** For EU IDs 6A and 7A, the Permittee shall:

a. For each affected unit that performs annual performance tests in accordance with Condition 26.2, submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

[18 AAC 50.040(j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(iii)]
[40 C.F.R. 60.4375(b), Subpart KKKK]

b. Report under excess emissions and permit deviation report described in Condition 30 when any of the standards or requirements in Conditions 24 through 26.4 are not met.

[18 AAC 50.040(j) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(iii) & (c)(6)]

27. NSPS Subpart KKKK SO_2 Standard. The Permittee shall not burn in EU IDs 6A and 7A, any fuel which contains total sulfur with potential sulfur emissions in excess of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input.

[18 AAC 50.040(a)(2)(QQ) & (j)(4) and 50.326(j)]
[40 C.F.R. 71.6(a)(1)]
[40 C.F.R. 60.4330(a)(2), Subpart KKKK]

27.1 **Monitoring.** The Permittee shall monitor compliance with the Subpart KKKK SO_2 standard in Condition 27, as follows:

[18 AAC 50.040(j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(i)]

a. Except as provided in Condition 27.1b, the Permittee must monitor the total sulfur content of the fuel fired in EU IDs 6A and 7A using total sulfur methods described in 40 C.F.R. 60.4415(a). Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than half the applicable limit, the Permittee may use ASTM D4084, D4810, D5504, or D6228, or Gas Processors Association Standard 2377 (all of which are incorporated by reference, see § 60.17), which measure the major sulfur compounds.

[40 C.F.R. 60.4360 and 60.4415(a), Subpart KKKK]

b. The Permittee may not elect to monitor the total sulfur content of the fuel combusted in EU IDs 6A and 7A, if the fuel is demonstrated not to exceed potential sulfur emissions of 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input. The Permittee shall use one of the following sources of information to make the required demonstration:

[40 C.F.R. 60.4365, Subpart KKKK]

(i) **Gaseous Fuel (Option 1).** The gas quality characteristics in a current, valid purchase contract, tariff sheet, or transportation contact for the fuel, specifying that the total sulfur content of the fuel is 20 grains of sulfur or less per 100 standard cubic feet or less; or

[40 C.F.R. 60.4365(a), Subpart KKKK]

(ii) **Gaseous Fuel (Option 2).** Representative fuel sampling data, which show that the sulfur content of the fuel does not exceed 26 ng SO_2/J (0.060 lb SO_2/MMBtu) heat input. At a minimum, the amount of fuel sampling data specified in 40 C.F.R. 75, Appendix D, Section 2.3.1.4 or 2.3.2.4 is required.

[40 C.F.R. 60.4365(b), Subpart KKKK]

c. The frequency of determining the sulfur content of the fuel are as follows:

(i) *Gaseous fuel.* If the Permittee elects not to demonstrate sulfur content using options in Condition 27.1b, and the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day.

[40 C.F.R. 60.4370(b), Subpart KKKK]

(ii) *Custom schedules.* Notwithstanding the requirements of Condition 27.1c(i), operators or fuel vendors may develop custom schedules for determination of the total sulfur content of gaseous fuels, based on the design and operation of the affected facility and the characteristics of the fuel supply. Except as provided in 40 C.F.R. 60.4370(c)(1) and (c)(2), custom schedules shall be substantiated with data and shall be approved by the Administrator before they can be used to comply with the standard in Condition 27. The two custom sulfur monitoring schedules set forth in 40 C.F.R. 60.4370(c)(1)(i) through (iv) and in paragraph 40 C.F.R. 60.4370(c)(2) are acceptable without prior Administrative approval.

[40 C.F.R. 60.4370(c), Subpart KKKK]

27.2 **Recordkeeping.** The Permittee shall keep records as required by Conditions 27.1a and 27.1b, and in accordance with the General Recordkeeping Requirements in the applicable operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50**.** The records may be kept in electronic format.

[18 AAC 50.040(j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(ii) & (c)(6)]

27.3 **Reporting.** The Permittee shall report as follows:

a. For each of EU IDs 6A and 7A that periodically determines the fuel sulfur content under Condition 27.1a, the Permittee must submit reports of excess emissions and monitor downtime[8], in accordance with 40 C.F.R. 60.7(c) as summarized in the NSPS Subpart A EEMSP report in Condition 17. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction.

[18 AAC 50.040(j)(4) & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(iii)]
[40 C.F.R. 60.4375(a) & 60.4395, Subpart KKKK]

b. Report in accordance with Condition 30 whenever fuel burned in EU IDs 6A or 7A exceeds the limit in Condition 27, or if any of Conditions 27.1 through 27.3a are not met.

[18 AAC 50.040(j) & 50.326(j)(4)]
[40 C.F.R. 71.6(a)(3)(iii) & (c)(6)]

[8] Excess emissions and monitor downtime for SO_2 are as defined in 40 C.F.R. 60.4385.

Section 6 Recordkeeping, Reporting, and Certification Requirements

28. 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 emissions 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.

28.1 The Department may accept an electronic signature on an electronic application or other electronic record required by the Department if the person providing the electronic signature

a. uses a security procedure, as defined in AS 09.80.190, that the Department has approved; and

b. accepts or agrees to be bound by an electronic record executed or adopted with that signature.

29. Submittals. Unless otherwise directed by the Department or this permit, the Permittee shall submit to the Department one certified copy of reports, compliance certifications, and/or other submittals required by this permit. The Permittee may submit the documents electronically or by hard copy.

29.1 Submit the certified copy of reports, compliance certifications, and/or other submittals in accordance with the submission instructions on the Department's Standard Permit Conditions web page at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-condition-xvii-submission-instructions/.

30. Excess Emissions and Permit Deviation Reports. The Permittee shall report excess emissions and permit deviations as follows:

30.1 **Excess Emissions Reporting.** Except as provided in Condition 34, the Permittee shall report all emissions or operations that exceed emissions standards or limits of this permit, 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 that the Permittee believes to be unavoidable.

b. In accordance with 18 AAC 50.235(a), 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.

c. If a continious or recurring excess emissions is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permision to report under Condition 30.1d.

d. Report all of the excess emissions not described in Conditions 30.1a, 30.1b, and 30.1c within 30 days after the end of the month during which the excess emissions occurred or as part of the next routine operating report in Condition 31 for excess emissions that occurred during the period covered by the report, whichever is sooner.

e. If requested by the Department, the Permittee shall provide a more detailed written report to follow up on an excess emissions that occurred during the period covered by the report, whichever is sooner.

30.2 **Permit Deviations Reporting.** For permit deviations that are not "excess emissions," as defined under 18 AAC 50.990:

a. Report all other permit deviations within 30 days after the end of the month during which the deviation occurred or as part of the next routine operating report in Condition 31 for permit deviations that occurred during the period covered by the report, whichever is sooner.

30.3 **Reporting Instructions.** When reporting either excess emissions or permit 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 Section 9 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 https://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/.

31. Operating Reports. The Permittee shall submit to the Department an operating report in accordance with Conditions 28 and 29 by May 15 for the period January 1 to March 31, by August 15 for the period April 1 to June 30, by November 15 for the period July 1 to September 30, and by February 15 for the period October 1 to December 31 of the previous year.

31.1 The operating report must include all information required to be in operating reports by other conditions of this permit, for the period covered by the report.

31.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 31.1, the Permittee shall identify

a. the date of the excess emissions or permit deviation;

b. the equipment involved;

c. the permit condition affected;

d. a description of the excess emissions or permit deviation; and

e. any corrective action or preventative measures taken and the date of such actions; or

31.3 when excess emissions or permit deviation reports have already been submitted under Condition 30 during the period covered by the operating report, the Permittee shall either

a. include a copy of those excess emissions or permit deviation reports with the operating report; or

b. cite the date(s) of those reports.

32. Emission Inventory Reporting. The Permittee shall submit to the Department reports of actual emissions for the previous calendar year, by emissions unit, of CO, NH_3, NO_x, PM_{10}, $PM_{2.5}$, SO_2, VOC and lead (Pb) and lead compounds, as follows:

32.1 **Every-year inventory.** Each year by April 30, if the stationary source's potential to emit (PTE) for the previous calendar year equals or exceeds:

a. 250 TPY of NH_3, PM_{10}, $PM_{2.5}$ or VOC; or

b. 2,500 TPY of CO, NO_x, or SO_2.

32.2 **Triennial inventory.** Every third year by April 30, if the stationary source's potential to emit does not meet any of the emission thresholds in Condition 32.1.

32.3 For reporting under Condition 32.2, the Permittee shall report the annual emissions and the required data elements under Condition 32.4 every third year for the previous calendar year as scheduled by the EPA.[9]

32.4 For each emissions unit and the stationary source, include in the report the required data elements[10] contained within the form included in the Emission Inventory Instructions available at the Department's AOS system on the Point Source Emission Inventory webpage at http://dec.alaska.gov/Applications/Air/airtoolsweb/PointSourceEmissionInventory.

32.5 Submit the report in accordance with the submission instructions on the Department's Standard Permit Conditions webpage at http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-xv-and-xvi-submission-instructions/.

33. Consistency of Reporting Methodologies. Regardless of permit classification, as of September 2022, all stationary sources operating in the state shall report actual emissions

[9] The calendar years for which reports are required are based on the triennial reporting schedule in 40 C.F.R. 51.30(b)(1), which requires states to report emissions data to the EPA for inventory years 2026, 2029, 2032, 2035, and every 3rd year thereafter. Therefore, the Department requires Permittees to report emissions data for the same inventory years by April 30 of the following year (e.g., triennial emission inventory report for 2026 is due April 30, 2027, triennial emissions inventory report for 2029 is due April 30, 2030, etc.).

[10] The required data elements to be reported to the EPA are outlined in 40 C.F.R. 51.15 and Tables 2a and 2b to Appendix A of 40 C.F.R. 51 Subpart A.

to the Department, either upon request or to meet individual permit requirements, in order for the state to meet federal requirements under 40 C.F.R. Part 51, Subpart A.

33.1 For the purposes of reporting actual or assessable emissions required under Condition 32 and Condition 4.2, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.

34. 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.

34.1 **Monitoring.** The Permittee shall monitor as follows:

a. As soon as practicable after becoming aware of a complaint that is attributable to emissions from the stationary source, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of Condition 34.

b. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint of investigation as soon as practicable if

(i) after an investigation because of a complaint or other reason, the Permittee believes that emissions from the stationary source have caused or are causing a violation of Condition 34; or

(ii) the Department notifies the Permittee that it has found a violation of Condition 34.

34.2 **Recordkeeping.** The Permittee shall keep records of

a. the date and 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, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 34; and

d. any corrective actions taken or planned for compliants attributable to emissions from the stationry source.

34.3 **Reporting.** The Permittee shall report as follows:

a. With each operating report under Condition 31, the Permittee shall include a brief summary report which must include the following for the period covered by the report:

(i) the number of complaints received;

(ii) the number of times the Permittee or the Department found corrective action necessary;

(iii) the number of times action was taken on a complaint within 24 hours; and

(iv) the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.

34.4 The Permittee shall notify the Department of a complaint that is attributable to emissions from the stationary source within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

Section 7 Standard Permit Conditions

35. 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

35.1 an enforcement action; or

35.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.

36. 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.

37. 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.

38. 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.

39. The permit does not convey any property rights of any sort, nor any exclusive privilege.

40. 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

40.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;

40.2 have access to and copy any records required by this permit;

40.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and

40.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 8 Permit Documentation

Date	Document Details
June 18, 2024	Application Received
September 6, 2024	Preliminary permit sent to Hilcorp for technical review.
October 1, 2024	Revision to application dated September 30, 2024 and completed technical review of the draft minor permit and TAR received from Hilcorp.
October 3, 2024	Received a copy of Notification of Modification 40 C.F.R. 60.7(a)(4) Solar Mars Combustion Turbine SoLoNOx Conversion, EU IDs 6 and 7, addressed to EPA. EUs are subject to NSPS Subpart KKKK.
December 6, 2024	Received correspondence from Hilcorp to include a transitional condition to switch between EU IDs 6A and 7A.
December 23, 2024	Preliminary draft and TAR sent for public notice.

Section 9 Notification Form[11]

Lisburne Production Center (LPC)
Stationary Source Name

AQ0272MSS03
Air Quality Permit Number

Hilcorp North Slope, LLC
Company Name

When did you discover the Excess Emissions/Permit 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 "permit deviations." However, use only Section 1 for events that involve excess emissions.

☐ Deviation from Permit Conditions - Complete Section 2 and Certify

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

☐ Deviation from COBC[12], CO[13], or Settlement Agreement - Complete Section 2 and Certify

[11] Revised as of July 22, 2020
[12] Compliance Order By Consent
[13] 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 permit. Identify each emission standard potentially exceeded during the event and the exceedance.

EU ID	EU Name	Permit 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. Permit Deviations

(a) **Permit 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
- ☐ Insignificant Emissions Unit 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 permit. List the corresponding permit condition and the deviation.

EU ID	EU Name	Permit 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_____

NOTE: *This document must be certified in accordance with 18 AAC 50.345(j). Read and sign the certification in the bottom of the form above. (See Condition 28.)*

Beginning September 7, 2023, Excess Emissions and Permit Deviations must be submitted through the AOS Permittee Portal at http://dec.alaska.gov/applications/air/airtoolsweb/.

This Notification Form may only be used to satisfy the reporting requirements if the Department has approved alternative reporting options in writing prior to submittal.

[18 AAC 50.346(b)(3)]