

DEPARTMENT OF ENVIRONMENTAL CONSERVATION
AIR QUALITY CONTROL MINOR PERMIT

Minor Permit No.: AQ1854MSS02
Rescinds Permit: AQ1854MSS01

Preliminary Date – January 30, 2026

The Alaska Department of Environmental Conservation (Department), under the authority of AS 46.14 and 18 AAC 50, issues Air Quality Control Minor Permit No. AQ1854MSS02 to the Permittee listed below.

Permittee: **Hilcorp Alaska LLC**
3800 Centerpoint Drive, Suite 1400
Anchorage, AK 99503

Stationary Source: **Omega Pad**

Location: Latitude: 70.349346 / Longitude: -149.362233

Project: Revisions to Minor Permit No. AQ1854MSS01

Permit Contact: Kaley Volper, (907) 564-4332, kaley.volper@hilcorp.com

The Permittee submitted an application for Minor Permit No. AQ1854MSS02 under 18 AAC 50.508(6) for revising or rescinding the terms and conditions of a Title I permit.

The stationary source's potential to emit (PTE) for particulate matter less than or equal to a nominal 2.5 microns in diameter (PM_{2.5}) exceeds the 10 TPY threshold in 18 AAC 50.502(c)(1). The Permittee has submitted an ambient demonstration for PM_{2.5} to show that the stationary source will not cause or contribute to an exceedance of the 24-hour and annual average PM_{2.5} Alaska Ambient Air Quality Standards (AAAQS).

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	NO _x	nitrogen oxides
AAC.....	Alaska Administrative Code	NMHC.....	non-methane hydrocarbons
ADEC	Alaska Department of Environmental Conservation	NRE.....	nonroad engine
AOS.....	Air Online Services	PM ₁₀	particulate matter less than or equal to a nominal 10 microns in diameter
AS.....	Alaska Statutes	PM _{2.5}	particulate matter less than or equal to a nominal 2.5 microns in diameter
ASTM.....	American Society for Testing and Materials	ppm	parts per million
bhp.....	brake horsepower	ppmv, ppmvd.....	parts per million by volume on a dry basis
C.F.R.	Code of Federal Regulations	PSD	prevention of significant deterioration
CO	carbon monoxide	PTE.....	potential to emit
Department	Alaska Department of Environmental Conservation	SIC.....	Standard Industrial Classification
dscf.....	dry standard cubic foot	SIP.....	State Implementation Plan
EPA	US Environmental Protection Agency	SPC.....	Standard Permit Condition or Standard Operating Permit Condition
EU.....	emissions unit	SO ₂	sulfur dioxide
gr/dscf.....	grain per dry standard cubic foot (1 pound = 7000 grains)	TBD.....	to be determined
HAPs	hazardous air pollutants [as defined in AS 46.14.990]	TPY	tons per year
hp.....	horsepower	ULSD	ultra-low sulfur diesel
H ₂ S.....	hydrogen sulfide	VOC	volatile organic compound [as defined in 40 C.F.R. 51.100(s)]
ID.....	identification number	vol%	volume percent
MMBtu/hr.....	million British thermal units per hour	wt%	weight percent
MR&R.....	monitoring, recordkeeping, and reporting	wt% _{S_{fuel}}	weight percent of sulfur in fuel
N/A.....	not applicable		

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

EU ID	EU Description	Make/Model	Fuel	Rating/Max Capacity	Installation Date
1	Hot Oil Heater	Tulsa Heater SHO5000 (Therminol)	Fuel Gas	61.34 MMBtu/hr	TBD
2	Hot Oil Heater	Tulsa Heater SHO5000 (Therminol)	Fuel Gas	61.34 MMBtu/hr	TBD
3	Hot Oil Heater	Tulsa Heater SHO5000 (Therminol)	Fuel Gas	61.34 MMBtu/hr	TBD
5a	Standby Engine	Caterpillar C18 (Tier 4)	ULSD	779 bhp	TBD
5b	Standby Engine	Caterpillar C18 (Tier 4)	ULSD	779 bhp	TBD
6	Emulsion Breaker Tank	TBD	N/A	2,300 gallons	TBD
7	Anti Foam Tank	TBD	N/A	2,300 gallons	TBD
8	Pad Buster Tank	TBD	N/A	2,300 gallons	TBD
9	Corrosion Inhibitor Tank	TBD	N/A	14,000 gallons	TBD
10	ULSD Tank	TBD	N/A	5,000 gallons	TBD

1. The Permittee shall comply with all applicable provisions of AS 46.14 and 18 AAC 50 when installing a replacement EU, including any applicable minor or construction permit requirements.
2. **Verification of Equipment Specifications and Maintenance of Equipment.** The Permittee shall install and maintain the equipment listed in Table 1 according to the manufacturer’s or operator’s maintenance procedures. Keep a copy of the manufacturer’s or operator’s maintenance procedure onsite and make records available to the Department personnel upon request. The records may be kept in electronic format.

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 127.00 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 the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates.
 - 5.3 If the stationary source has not commenced construction or operation on or before March 31st, the Permittee may submit to the Department’s Anchorage office a waiver letter certified under 18 AAC 50.205 that states the stationary source’s actual annual emissions for the previous calendar year are zero TPY and provides estimates for when construction or operation will commence.

- 5.4 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 in Condition 4.1.
- 6. Annual Compliance Fee.** For a stationary source not classified as needing a Title V permit, the Permittee shall pay an annual compliance fee as set out in 18 AAC 50.400(d), to be paid for each period from July 1 through the following June 30.

Section 3 State Emission Standards

- 7. Visible Emissions for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EU IDs 1 – 3, 5a, and 5b listed in Table 1 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.
- 7.1 For EU IDs 1 – 3, burn only gas as fuel. In each operating report under Condition 16, indicate whether each of EU IDs 1 – 3 burned only fuel gas during the period covered by the report.
- 7.2 For EU IDs 5a and 5b, perform an initial Method 9 observation within 60 days of initial startup of the EU.
- a. Record the date of initial startup of EU IDs 5a and 5b.
 - b. Report the results of the Method 9 observation(s) required by Condition 7.2 in the operating report required by Condition 16 for the period during which the given observation was performed.
- 7.3 Report as an excess emission or permit deviation as described in Condition 15 if visible emissions from any of EU IDs 1 – 3, 5a, and 5b exceed the opacity standard in Condition 7 or if any requirement in Conditions 7.1 through 7.2 is not met.
- 8. Particulate Matter (PM) for Industrial Process and Fuel-Burning Equipment.** The Permittee shall not cause or allow particulate matter emitted from EU IDs 1 – 3, 5a, and 5b listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
- 8.1 For EU IDs 1 – 3, demonstrate compliance with the PM standard by complying with Condition 7.1.
- 8.2 For EU IDs 5a and 5b, demonstrate compliance with the PM standard by complying with Condition 7.2.
- 9. Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from EU IDs 1 – 3, 5a, and 5b, listed in Table 1, to exceed 500 parts per million (ppm) averaged over three hours.

For Fuel Gas-Fired (EUs 1 – 3)

- 9.1 For EU IDs 1 – 3, the Permittee shall determine compliance as follows:
- a. Analyze a representative sample of the fuel, no less than once a calendar month, to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) and 40 C.F.R. 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

- b. In each operating report required by Condition 16, include copies of the records required by Condition 9.1 for the reporting period covered by the report.
- c. Report as excess emissions and permit deviation as described by Condition 15, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 9.

Section 4 Ambient Air Quality Protection Requirements

10. The Permittee shall protect the 24-hour and annual average PM_{2.5} Alaska Ambient Air Quality Standards (AAAQS), as follows:

10.1 **Stack Heights.** Construct and maintain the exhaust stacks for the EUs listed in Table 2 so that the height above grade¹ equals or exceeds the minimum height listed for that EU.

Table 2 – Minimum Stack Height Requirements

EU ID	Description	Min. Stack Height (m)
1	Hot Oil Heater	11.3
2	Hot Oil Heater	11.3
3	Hot Oil Heater	11.3

- a. Provide as-built drawings, photographs, or other information sufficient to demonstrate that each exhaust stack listed in Table 2 complies with the minimum stack height requirements in the operating report required by Condition 16 for the period when the given EU was installed.
 - b. Report as an excess emission or permit deviation as described in Condition 15 if any requirement under Condition 10.1 is not met.
- 10.2 **EPA’s Nonroad Tier 4 Emission Standards.** The Permittee shall protect the 24-hour and annual average PM_{2.5} AAAQS by operating EPA Tier 4 compliant engines as EU IDs 5a and 5b.
- a. For EU IDs 5a and 5b, obtain a certified manufacturer’s guarantee, photograph of the engine nameplate, or copy of the EPA certificate of conformity that indicates that EU IDs 5a and 5b comply with EPA’s Tier 4 emissions standards found in Table 1 of 40 C.F.R. 1039.101.
 - b. Submit a copy of the records required in Condition 10.2a in the operating report required by Condition 16 for the period when EU IDs 5a and 5b become fully operational.
 - c. Report as excess emissions and/or permit deviation as described in Condition 15 if any requirement under Condition 10.2 is not met.

¹ or as otherwise measured from the stack base, e.g., from above a pad or platform surface.

Section 5 Recordkeeping, Reporting, and Certification Requirements

- 11. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:
- 11.1 Copies of all reports and certifications submitted pursuant to this section of the permit; and
 - 11.2 Records of all monitoring required by this permit, and information about the monitoring including:
 - a. the date, place, and time of sampling or measurements;
 - b. the date(s) analyses were performed;
 - c. the company or entity that performed the sampling and analyses;
 - d. the analytical techniques or methods used in the analyses;
 - e. the results of the analyses; and
 - f. the operating conditions that existed at the time of sampling or measurement.
- 12. 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.
- 12.1 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.
- 13. 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.
- 13.1 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/>.

- 14. Information Requests.** The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke, reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.
- 15. Excess Emissions and Permit Deviation Reports.** The Permittee shall report excess emissions and permit deviations as follows:
- 15.1 Excess Emissions Reporting.** Except as provided in Condition 18, 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 emissions standard.
 - c. If a continuous or recurring excess emissions is not corrected within 48 hours of discovery, report within 72 hours of discovery unless the Department provides written permission to report under Condition 15.1d.
 - d. Report all other excess emissions not described in Conditions 15.1a, 15.1b, and 15.1c 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 16 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 report.
- 15.2 Permit Deviations Reporting.** For permit deviations that are not “excess emissions,” as defined under 18 AAC 50.990:
- a. Report 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 16 for permit deviations that occurred during the period covered by the report, whichever is sooner.

- 15.3 **Reporting Instructions.** When reporting either excess emissions or permit deviations, the Permittee shall report using the Department's online form for all such submittals. 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 of this permit. The Permittee must provide all information called for by the form that is used. Submit the report in accordance with the submission instructions on the Department's Standard Permit Conditions webpage found at <http://dec.alaska.gov/air/air-permit/standard-conditions/standard-conditions-iii-and-iv-submission-instructions/>.
16. **Operating Reports.** During the life of this permit², the Permittee shall submit to the Department an operating report in accordance with Conditions 12 and 13 by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.
- 16.1 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.
- 16.2 When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 16.1, 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 preventive measures taken and the date(s) of such actions; or
- 16.3 When excess emissions or permit deviation reports have already been reported under Condition 15 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.
17. **Annual Affirmation.** The Permittee shall submit to the Department by March 31 of each year an affirmation certified according to Condition 12 of whether the stationary source is still accurately described by the application and this permit, and whether any changes have

² *Life of this permit* is defined as the permit effective dates, including any periods of reporting obligations that extend beyond the permit effective dates. For example, if a permit expires prior to the end of a calendar year, there is still a reporting obligation to provide operating reports for the periods when the permit was in effect.

been made to the stationary source that would trigger the requirement for a new permit under 18 AAC 50.

- 18. 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.

18.1 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 18.
- b. The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or 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 18; or
 - (ii) the Department notifies the Permittee that it has found a violation of Condition 18.

18.2 Recordkeeping. The Permittee shall keep records of

- a. the date, time, and nature of all emissions complaints received;
- b. the name of the person or persons that complained, if known;
- c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of Condition 18; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

18.3 Reporting. The Permittee shall report as follows:

- a. With each stationary source operating report under Condition 16, 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.
 - b. 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.
 - c. If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to Condition 15.
- 19. Triennial Emission Inventory Reporting.** Every third year by April 30, the Permittee shall submit to the Department reports of actual emissions for the previous calendar year, by emissions unit, of CO, NH₃, NO_x, PM₁₀, PM_{2.5}, SO₂, VOC and lead (Pb) and lead compounds, as follows:
- 19.1 The Permittee shall report the annual emissions and the required data elements under Condition 19.2 every third year for the previous calendar year as scheduled by the EPA.³
 - 19.2 For each emissions unit and the stationary source, include in the report the required data elements⁴ 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>.
 - 19.3 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/>.
- 20. Consistency of Reporting Methodologies.** The Permittee shall report actual emissions to the Department, either upon request or to meet individual permit requirements, in order for the state to meet federal reporting requirements under 40 C.F.R. Part 51, Subpart A.
- 20.1 For the purposes of reporting actual or assessable emissions required under Condition 19 and Condition 4.2, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.

³ 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 2017, 2020, 2023, 2026, 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 2023 is due April 30, 2024, triennial emission inventory report for 2026 is due April 30, 2027, etc.).

⁴ 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.

Section 6 *Standard Permit Conditions*

21. 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
 - 21.1 an enforcement action; or
 - 21.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280.
22. 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.
23. 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.
24. 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.
25. The permit does not convey any property rights of any sort, nor any exclusive privilege.
26. 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
 - 26.1 enter upon the premises where an emissions unit subject to this permit is located or where records required by the permit are kept;
 - 26.2 have access to and copy any records required by this permit;
 - 26.3 inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and
 - 26.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

Section 7 *Permit Documentation*

Date

Document Details

September 5, 2025

Application received.

November 3, 2025

Hilcorp response to October 24, 2025 ADEC information request.

December 29, 2025

Comments from Hilcorp from technical review (pre-public notice) via email.

Section 8 Visible Emissions Form

VISIBLE EMISSIONS OBSERVATION FORM

This form is designed to be used in conjunction with EPA Method 9, “Visual Determination of the Opacity of Emissions from Stationary Sources.” Temporal changes in emission color, plume water droplet content, background color, sky conditions, observer position, etc. should be noted in the comments section adjacent to each minute of readings. Any information not dealt with elsewhere on the form should be noted under Additional Information. The following are brief descriptions of the type of information that needs to be entered on the form. For a more detailed discussion of each part of the form, refer to “Instructions for Use of Visible Emission Observation Form” (a copy is available in <https://www3.epa.gov/ttnemc01/methods/webinar8.pdf>).

- Source Name: full company name, parent company or division or subsidiary information, if necessary.
- Address: street (not mailing or home office) address of facility where visible emissions observation is being made.
- Phone (Key Contact): number for appropriate contact.
- Stationary Source ID Number: number from NEDS, agency file, etc.
- Process Equipment, Operating Mode: brief description of process equipment (include type of facility) and operating rate, % capacity, and/or mode (e.g., charging, tapping, shutdown).
- Control Equipment, Operating Mode: specify type of control device(s) and % utilization, control efficiency.
- Describe Emission Point: for identification purposes, stack or emission point appearance, location, and geometry; and whether emissions are confined (have a specifically designed outlet) or unconfined (fugitive).
- Height Above Ground Level: stack or emission point height relative to ground level; can use engineering drawings, Abney level, or clinometer.
- Height Relative to Observer: indicate height of emission point relative to the observation point.
- Distance from Observer: distance to emission point; can use rangefinder or map.
- Direction from Observer: direction plume is traveling from observer.
- Describe Emissions and Color: include physical characteristics, plume behavior (e.g., looping, lacy, condensing, fumigating, secondary particle formation, distance plume visible, etc.), and color of emissions (gray, brown, white, red, black, etc.). Note color changes in comments section.
- Visible Water Vapor Present? check “yes” if visible water vapor is present.
- If Present, note in the Comments column whether the Plume is “attached” if water droplet plume forms prior to exiting stack, and “detached” if water droplet plume forms after exiting stack.
- Point in Plume at Which Opacity was Determined: describe physical location in plume where readings were made (e.g., 1 ft above stack exit or 10 ft. after dissipation of water plume).
- Describe Plume Background: object plume is read against, include texture and atmospheric conditions (e.g., hazy).
- Background Color: sky blue, gray-white, new leaf green, etc.
- Sky Conditions: indicate color of clouds and cloud cover by percentage or by description (clear, scattered, broken, overcast).
- Wind Speed: record wind speed; can use Beaufort wind scale or hand-held anemometer to estimate.
- Wind Direction From: direction from which wind is blowing; can use compass to estimate to eight points.
- Ambient Temperature: in degrees Fahrenheit or Celsius.
- Wet Bulb Temperature: can be measured using a sling psychrometer.
- RH Percent: relative humidity measured using a sling psychrometer; use local US Weather Bureau measurements only if nearby.
- Source Layout Sketch: include wind direction, sun position, associated stacks, roads, and other landmarks to fully identify location of emission point and observer position.
- Draw North Arrow: to determine, point line of sight in direction of emission point, place compass beside circle, and draw in arrow parallel to compass needle.
- Sun’s Location: point line of sight in direction of emission point, move pen upright along sun location line, mark location of sun when pen’s shadow crosses the observer’s position.
- Observation Date: date observations conducted.
- Start Time, End Time: beginning and end times of observation period (e.g., 1635 or 4:35 p.m.).
- Data Set: percent opacity to nearest 5%; enter from left to right starting in left column. Use a second (third, etc.) form, if readings continue beyond 30 minutes. Use dash (-) for readings not made; explain in adjacent comments section.
- Comments: note changing observation conditions, plume characteristics, and/or reasons for missed readings.
- Range of Opacity: note highest and lowest opacity number.
- Observer’s Name: print in full.
- Observer’s Signature, Date: sign and date after performing VE observation.
- Observer’s Affiliation: observer’s employer.
- Certifying Organization, Certified By, Date: name of “smoke school,” certifying observer, and date of most recent certification.

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION AIR PERMITS PROGRAM - VISIBLE EMISSIONS OBSERVATION FORM							Page No.		
Stationary Source Name		Type of Emission Unit		Observation Date		Start Time	End Time		
Emission Unit Location				Sec	0	15	30	45	Comments
				Min					
City	State	Zip		1					
Phone # (Key Contact)		Stationary Source ID Number		2					
Process Equipment		Operating Mode		3					
Control Equipment		Operating Mode		4					
Describe Emission Point/Location				5					
Height above ground level		Height relative to observer		Clinometer Reading		6			
Distance From Observer		Direction From Observer		7					
Start		End		Start		End		8	
Describe Emissions & Color				9					
Start		End		10					
Visible Water Vapor Present? If yes, determine approximate distance from the stack exit to where the plume was read				11					
No	Yes			12					
Point in Plume at Which Opacity Was Determined				13					
Describe Plume Background		Background Color		14					
Start		Start		15					
End		End		16					
Sky Conditions:				17					
Start		End		18					
Wind Speed		Wind Direction From		19					
Start		End		Start		End		20	
Ambient Temperature		Wet Bulb Temp		RH percent		21			
SOURCE LAYOUT SKETCH: 1 Stack or Point Being Read 2 Wind Direction From				22					
3 Observer Location 4 Sun Location 5 North Arrow 6 Other Stacks				23					
				24					
				25					
				26					
				27					
				28					
				29					
				30					
				Additional Information:				30	
				Range of Opacity:		Minimum		Maximum	
I have received a copy of these opacity observations				Print Observer's Name					
Print Name:				Observer's Signature				Date	
Signature:								Observer's Affiliation:	
Title		Date		Certifying Organization:				Date	
				Certified By:				Date	
Data Reduction:									
Duration of Observation Period (minutes):				Duration Required by Permit (minutes):					
Number of Observations:				Highest Six-Minute Average Opacity (%):					
Number of Observations exceeding 20%:				Highest 18-Consecutive -Minute Average Opacity %(engines and turbines only)					
In compliance with six-minute opacity limit? (Yes or No)									
Average Opacity Summary:									
Set Number	Time		Opacity		Sum		Average		Comments
	Start	End							

Section 9 Notification Form⁵

<u>Omega Pad</u> Stationary Source Name	<u>AQ1854MSS02</u> Air Quality Permit Number
<u>Hilcorp Alaska LLC</u> 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 COBC⁶, CO⁷, or Settlement Agreement - Complete Section 2 and Certify

⁵ Revised as of July 22, 2020.
⁶ Compliance Order by Consent
⁷ 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
- Control Equipment Failure
- Bad fuel/coal/gas
- Other _____
- Natural Cause (weather/earthquake/flood)
- Scheduled Maintenance/Equipment Adjustments
- Upset Condition

(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 _____%

Venting _____(gas/scf)

Control Equipment Down

Fugitive Emissions

Emission Limit Exceeded

Marine Vessel Opacity

Flaring

Other: _____

(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 (go to end of form)

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 12.)*

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)]