

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY OPERATING PERMIT

Permit No. AQ0062TVP05

Issue Date: [EPA Review - March 27, 2026]

Expiration Date: [Five Years]

The Alaska Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **Hilcorp Alaska, LLC**, for the operation of the **Anna Platform**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As set out in AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

Citations listed herein are contained within the effective version of 18 AAC 50 at permit issuance. All federal regulation citations are from those sections adopted by reference in this version of regulation in 18 AAC 50.040 unless otherwise specified.

All currently applicable stationary source-specific terms and conditions of Air Quality Control Minor Permit No. AQ0062MSS02 have been incorporated into this operating permit.

Upon effective date of this permit, Operating Permit No. AQ0062TVP04 expires.

This operating permit becomes effective <insert date—30 days after issue date>.

James R. Plosay, Manager
Air Permits Program

Table of Contents

	Abbreviations and Acronyms	iv
Section 1.	Stationary Source Information.....	1
	Identification	1
Section 2.	Emissions Unit Inventory and Description	2
Section 3.	State Requirements	4
	Visible Emissions Standard	4
	Visible Emissions Monitoring, Recordkeeping, and Reporting (MR&R).....	4
	Particulate Matter (PM) Emissions Standard.....	9
	PM MR&R.....	9
	Visible Emissions & PM MR&R.....	11
	Sulfur Compound Emissions Standard	12
	Sulfur Compound Emissions MR&R	12
	Preconstruction Permit Requirements.....	13
	Insignificant Emissions Units	15
Section 4.	Federal Requirements	17
	40 CFR Part 60 New Source Performance Standards (NSPS)	17
	NSPS Subpart A – General Provisions	17
	NSPS Subpart GG – Turbines, EU IDs 3, 4, and 5.....	20
	NSPS Subpart IIII – Compression Ignition Internal Combustion Engines (CI ICE), EU ID 16	27
	40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)	29
	NESHAP Subpart A – General Provisions	29
	NESHAP Subpart HH – Oil and Natural Gas Production Facilities, EU ID 27	29
	NESHAP Subpart ZZZZ – Stationary RICE, EU IDs 7 through 18.....	33
	40 CFR Part 61 NESHAP	38
	NESHAP Subpart A – General Provisions & Subpart M – Asbestos.....	38
	40 CFR Part 82 Protection of Stratospheric Ozone	38
	NESHAP Applicability Determination Requirements.....	39
Section 5.	General Conditions	40
	Standard Terms and Conditions.....	40
	Open Burning Requirements.....	43

Section 6.	General Source Testing and Monitoring Requirements.....	44
Section 7.	General Recordkeeping and Reporting Requirements.....	47
	Recordkeeping Requirements	47
	Reporting Requirements	47
Section 8.	Permit Changes and Renewal	54
Section 9.	Compliance Requirements	56
	General Compliance Requirements	56
Section 10.	Permit As Shield from Inapplicable Requirements	58
Section 11.	Visible Emissions Forms	61
Section 12.	SO ₂ Material Balance Calculation	63
Section 13.	Notification Form.....	64

Abbreviations and Acronyms

AAAQS	Alaska Ambient Air Quality Standards	MMBtu/hr	million British thermal units per hour
AAC.....	Alaska Administrative Code	MMscf.....	million standard cubic feet
ADEC	Alaska Department of Environmental Conservation	MR&R.....	monitoring, recordkeeping, and reporting
Administrator.....	EPA and the Department	NAICS.....	North American Industrial Classification System
AOS	Air Online Services	NESHAP	National Emission Standards for Hazardous Air Pollutants [as contained in 40 CFR 61 and 63]
AS.....	Alaska Statutes	NH ₃	ammonia
ASTM.....	American Society for Testing and Materials	NO _x	nitrogen oxides
BACT	best available control technology	NO ₂	nitrogen dioxide
CBI	confidential business information	NSPS	New Source Performance Standards [as contained in 40 CFR 60]
CDX.....	Central Data Exchange	O ₂	oxygen
CEDRI.....	Compliance and Emissions Data Reporting Interface	Pb	lead
CFR	Code of Federal Regulations	PM.....	particulate matter
CAA or The Act .	Clean Air Act	PM ₁₀	particulate matter less than or equal to a nominal 10 microns in diameter
CO	carbon monoxide	PM _{2.5}	particulate matter less than or equal to a nominal 2.5 microns in diameter
CO _{2e}	CO ₂ -equivalent	ppm	parts per million
CROMERR.....	Cross-Media Electronic Reporting Rule	ppmv, ppmvd	parts per million by volume on a dry basis
Department	Alaska Department of Environmental Conservation	psia	pounds per square inch (absolute)
dscf.....	dry standard cubic foot	PSD	prevention of significant deterioration
EPA	US Environmental Protection Agency	PTE	potential to emit
ERT	Electronic Reporting Tool	SIC.	Standard Industrial Classification
EU.....	emissions unit	SIP.....	State Implementation Plan
EU ID	emissions unit identification	SPC	Standard Permit Condition
GAPCP	Good Air Pollution Control Practice	SO ₂	sulfur dioxide
GHG	Greenhouse Gas	TPY	tons per year
gr/dscf.....	grain per dry standard cubic foot (1 pound = 7000 grains)	VOC	volatile organic compound [as defined in 40 CFR 51.100(s)]
HAPs	hazardous air pollutants [as defined in AS 46.14.990]	vol%	volume percent
hp.....	horsepower	wt%	weight percent
MACT	maximum achievable control technology [as defined in 40 CFR 63]	wt% _{fuel}	weight percent of sulfur in fuel

Section 1. Stationary Source Information

Identification

Permittee:	Hilcorp Alaska, LLC 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503	
Stationary Source Name:	Anna Platform	
Location:	60° 58' 36.98" North; 151° 18' 47.99" West	
Physical Address:	Upper Cook Inlet Cook Inlet, AK	
Owner/Operator:	Hilcorp Alaska, LLC 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503	
Permittee's Responsible Official:	Luke Saugier, Senior Vice President Trudi Hallet, Asset Team Lead Chris Kanyer, Asset Team Lead Anthony McConkey, Asset Team Lead Jill Fisk, Asset Team Lead 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503	
Designated Agent:	Cogency Global Inc. P.O. Box 33735 Juneau, AK 99803 (866) 621-3524 statrep@kogencyglobal.com	
Stationary Source and Building Contact:	Drew Anderson, Regional Environmental Manager 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8488 ananderson@hilcorp.com	
Fee Contact:	Hilcorp Alaska, LLC, Accounts Payable 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503	
Permit Contact:	Drew Anderson, Regional Environmental Manager 3800 Centerpoint Drive, Suite 1400 Anchorage, AK 99503 (907) 777-8488 ananderson@hilcorp.com	
Process Description:	SIC Code	1311 - Crude Petroleum and Natural Gas
	NAICS Code:	211120 - Crude Petroleum Extraction 211130 - Natural Gas Extraction

[18 AAC 50.040(j)(3) & 50.326(a)]
 [40 CFR 71.5(c)(1) & (2)]

Section 2. Emissions Unit Inventory and Description

Emissions units (EUs) listed in Table 1 and Table 2 have specific monitoring, recordkeeping, or reporting conditions in this permit. Emissions unit descriptions and ratings are given for identification purposes only, unless noted elsewhere in the permit.

Table 1 - Emissions Unit Inventory¹

EU ID¹	Emissions Unit Name	Emissions Unit Description	Fuel Type	Rating/Size	Installation or Construction Date
2	Solar AC #3	Solar Saturn MK-1 Turbine (A-PM-0500)	Fuel Gas	750 kW	1971
3	Solar Bing #1	Solar Saturn T-1400 Turbine (A-PM-0420)	Fuel Gas	1,400 hp	1996
4	Solar Bing #2	Solar Saturn T-1400 Turbine (A-PM-0430)	Fuel Gas	1,400 hp	1997
5	Solar AC #2	Solar Saturn MK-II Turbine (A-PM-0560)	Fuel Gas / Diesel	800 kW	1985
7	Kobe Pump Drive #1	Waukesha Triplex 1197G (A-PM-0390)	Fuel Gas	150 hp	1968
8	Kobe Pump Drive #2	Waukesha Triplex 1197G (A-PM-0400)	Fuel Gas	150 hp	1968
9	Kobe Pump Drive #3	Waukesha Triplex 1197G (A-PM-0410)	Fuel Gas	150 hp	1968
10	Kobe Pump Drive #7	Waukesha Triplex 1905G (A-PM-0440)	Fuel Gas	180 hp	1968
11	Kobe Pump Drive #8	Waukesha Triplex 1905G (A-PM-0450)	Fuel Gas	180 hp	1968
12	Kobe Pump Drive #9	Waukesha Triplex 1905G (A-PM-0460)	Fuel Gas	180 hp	1968
13	Emergency Generator Drive	Caterpillar G-399 Engine (A-PM-0028)	Fuel Gas	750 hp	1982
14	Fire Water Pump Drive	Waukesha 1197D Engine (A-PM-0880)	Diesel	192 hp	1966
15	Backup Generator Drive	Caterpillar DE-3208 Engine (A-PM-0034)	Diesel	235 hp	1984
16	SeaTrax West Crane	John Deere 6135 Engine (A-CR-0650)	Diesel	500 hp	2007 ²
17	Sea King East Crane	Caterpillar D-3406B Engine (A-CR-0651)	Diesel	325 hp	1988
18	Air Compressor Drive	Detroit Diesel D6-71 Engine (A-PM-0021)	Diesel	165 hp	1979

EU ID ¹	Emissions Unit Name	Emissions Unit Description	Fuel Type	Rating/Size	Installation or Construction Date
19	Safety/Operating Flares	Flare (HP/LP) and Pilot (A-SP-SF/HP/LP)	Fuel Gas	28 MMscfd	1966
27	TEG Dehydration Unit	Glycol Regenerator (A-V-0580)	N/A	9 MMscfd	2007

Notes:

1. EU IDs 6 and 24 through 26 were removed from the Anna Platform in May 2014.
2. EU ID 16 was manufactured after April 1, 2006 but before the 2007 model year and installed in 2007.

Table 2 - Spartan Drill Rig Emissions Unit Inventory¹

EU ID	EU Description	Make/Model	Fuel Type	Rating/Max Capacity	Construction Date	NRE Status ¹
S1	Rig Engine No. 1	Caterpillar D-399	Diesel	1,100 hp	1981	Yes
S2	Rig Engine No. 2	Caterpillar D-399	Diesel	1,100 hp	1981	Yes
S3	Rig Engine No. 3	Caterpillar D-398	Diesel	970 hp	1981	Yes
S4	Rig Engine No. 4	Caterpillar D-398	Diesel	970 hp	1981	Yes
S5	Rig Engine No. 5	Caterpillar D-398	Diesel	970 hp	1981	Yes
S6	Rig Engine No. 6	Caterpillar D-398	Diesel	970 hp	1981	Yes
S7	Rig Engine No. 7	Caterpillar D-398	Diesel	970 hp	1981	Yes
S8	Crane Engine No. 1	Caterpillar D-3306	Diesel	300 hp	1981	Yes
S9	Crane Engine No. 2	Detroit Diesel 671	Diesel	285 hp	1981	Yes
S10	Cement Pump Engine No. 1	TBD	Diesel	490 hp	1981	Yes
S11	Cement Pump Engine No. 2	TBD	Diesel	490 hp	1981	Yes
S12	Diesel Tank No. 10	N/A	N/A	32,943 gal	1981	N/A
	Diesel Tank No. 11	N/A	N/A	646 gal	1981	N/A
	Diesel Tank No. 12	N/A	N/A	28,663 gal	1981	N/A
	Diesel Tank No. 13	N/A	N/A	3,305 gal	1981	N/A
S13	Lifeboat Engine No. 1	TBD	Diesel	36 hp	1981	Yes
S14	Lifeboat Engine No. 2	TBD	Diesel	36 hp	1981	Yes

Notes:

1. EU IDs S1 through S11, S13, and S14 are nonroad engines (NREs). EUs classified as NREs must meet the definition of “nonroad engine” at 40 C.F.R. 1068.30, Subpart A.

[18 AAC 50.326(a)]
 [40 CFR 71.5(c)(3)]

Section 3. State Requirements

Visible Emissions Standard

- 1. 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 2 through 5 and 7 through 19 listed in Table 1 to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

[18 AAC 50.040(j)(4), 50.055(a)(1), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(1)]

- 1.1. For EU IDs 2 through 4 and 7 through 13, burn only gas as fuel. In each operating report under Condition 80 indicate whether each of these emissions units burned only gas during the period covered by the report. Report under Condition 79 if any fuel other than gas is burned in any of these emissions units.
- 1.2. For EU ID 5, burn gas as the primary fuel. Monitoring for this emissions unit shall consist of a statement in each operating report under Condition 80 indicating whether this emissions unit burned gas as the primary fuel during the period covered by the report. If EU ID 5 operated on a back-up liquid fuel during the period covered by the report, the Permittee shall monitor, record, and report in accordance with Condition 10 for that emissions unit.
- 1.3. For each of EU IDs 14 through 18, as long as actual emissions from the emissions unit are less than the significant emissions thresholds listed in 18 AAC 50.326(e) during any consecutive 12-month period, monitoring shall consist of an annual compliance certification under Condition 81 for the visible emissions standard based on reasonable inquiry. The Permittee shall report in the operating report under Condition 80 if any of EU IDs 14 through 18 reaches any of the significant emissions thresholds listed in 18 AAC 50.326(e) and monitor, record, and report in accordance with Conditions 2 through 4 for the remainder of the permit term for that emissions unit.
- 1.4. For EU ID 19, monitor, record and report in accordance with Condition 5.

[18 AAC 50.040(j)(4), 50.326(j)(3) & (4), & 50.346(c)]
[40 CFR 71.6(a)(3) & (c)(6)]

Visible Emissions Monitoring, Recordkeeping, and Reporting (MR&R)

Liquid Fuel-Burning Equipment

- 2. Visible Emissions Monitoring.** When required by Condition 1.3, or in the event of replacement¹ during the permit term, the Permittee shall observe the exhaust of EU IDs 14 through 18 for visible emissions using either the Method 9 Plan under Condition 2.2.
 - 2.1. The Permittee may, for each unit, elect to continue the visible emissions monitoring schedule specified in Conditions 2.2.b through 2.2.e that remains in effect from a previous permit.

¹ "Replacement," as defined in 40 CFR 51.166(b)(32).

- 2.2. **Method 9 Plan.** For all observations in this plan, observe emissions unit exhaust, following 40 CFR 60, Appendix A-4, Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations.²
- a. First Method 9 Observation. Except as provided in Condition 2.1, observe the exhausts of EU IDs 14 through 18 according to the following criteria:
 - (i) For any unit replaced, observe exhaust within 60 days of the newly installed emissions unit becoming fully operational.³ Except as provided in Condition 2.2.e, after the First Method 9 observation:
 - (A) For EU IDs 14 through 18, comply with Condition 1.3.
 - (ii) For each of EU IDs 14 through 18, observe the exhaust of the emissions unit within 30 days after the end of the calendar month during which monitoring was triggered under Condition 1.3; or for an emissions unit with intermittent operations, within the first 30 days during the unit's next scheduled operation.
 - b. Monthly Method 9 Observations. After the first Method 9 observation conducted under Condition 2.2.a, perform observations at least once in each calendar month that the emissions unit operates.
 - c. Semiannual Method 9 Observations. After at least three monthly observations under Condition 2.2.b, unless a six-consecutive-minute average opacity is greater than 15 percent and one or more individual observations are greater than 20 percent, perform semiannual observations
 - (i) no later than seven months, but not earlier than five months, after the preceding observation; or
 - (ii) for an emissions unit with intermittent operations, during the next scheduled operation immediately following seven months after the preceding observation.
 - d. Annual Method 9 Observations. After at least two semiannual observations under Condition 2.2.c, unless a six-consecutive-minute average opacity is greater than 15 percent and one or more individual observations are greater than 20 percent, perform annual observations
 - (i) no later than 12 months, but not earlier than 10 months, after the preceding observation; or
 - (ii) for an emissions unit with intermittent operations, during the next scheduled operation immediately following 14 months after the preceding observation.

² Visible emissions observations are not required during emergency operations.

³ "Fully operational" means upon completion of all functionality checks and commissioning after unit installation. "Installation" is complete when the unit is ready for functionality checks to begin.

- e. Increased Method 9 Frequency. If a six-consecutive-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more individual observations are greater than 20 percent, then increase or maintain the observation frequency for that emissions unit to at least monthly intervals as described in Condition 2.2.b, and continue monitoring in accordance with the Method 9 Plan.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(i)]

3. Visible Emissions Recordkeeping. The Permittee shall keep records as follows:

3.1. For all Method 9 observations,

- a. the observer shall record the following:
 - (i) the name of the stationary source, emissions unit and location, emissions unit type, observer's name and affiliation, and the date on the Visible Emissions Observation Form in Section 11;
 - (ii) the time, estimated distance to the emissions location, sun location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate or best estimate, if unknown) on the sheet at the time opacity observations are initiated and completed;
 - (iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;
 - (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emission Observation Form in Section 11; and
 - (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.
- b. To determine the six-minute average opacity,
 - (i) divide the observations recorded on the record sheet into sets of 24 consecutive observations;
 - (ii) sets need not be consecutive in time and in no case shall two sets overlap;
 - (iii) for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; and
 - (iv) record the average opacity on the sheet.

- c. Calculate and record the highest six- and 18-consecutive-minute average opacities observed.
- 3.2. The records required by Condition 3.1 may be kept in electronic format.
- [18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(ii)]

4. Visible Emissions Reporting. The Permittee shall report as follows:

- 4.1. In the first operating report required in Condition 80 under this permit term, the Permittee shall state the intention to either continue the visible emissions monitoring schedule in effect from the previous permit or reset the visible emissions monitoring schedule.
 - 4.2. Include in each operating report required under Condition 80 for the period covered by the report
 - a. for all Method 9 Plan observations:
 - (i) copies of the observation results (i.e., opacity observations) for each emissions unit, except for the observations the Permittee has already supplied to the Department; and
 - (ii) a summary to include:
 - (A) number of days observations were made;
 - (B) highest six-consecutive- and 18-consecutive-minute average opacities observed; and
 - (C) dates when one or more observed six-consecutive-minute average opacities were greater than 20 percent;
 - b. a summary of any monitoring or recordkeeping required under Conditions 2 and 3 that was not done.
 - 4.3. Report under Condition 79:
 - a. the results of Method 9 observations that exceed 20 percent average opacity for any six-consecutive-minute period; and
 - b. if any monitoring under Condition 2 was not performed when required, report within three days of the date that the monitoring was required.
- [18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(iii)]

Flares

5. Visible Emissions MR&R. The Permittee shall monitor, record, and report as follows:

- 5.1. Observe flare events⁴ on EU ID 19, for visible emissions following 40 CFR 60, Appendix A-4, Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations according to the following schedule:
 - a. Conduct an initial visible emissions observation on EU ID 19 within 12 months of the effective date of this permit.
 - b. Conduct subsequent visible emissions observations within 14 months of, but not earlier than three months after, the preceding flare event visible emissions observation.
 - c. If there are no flare events that meet the requirements of Conditions 5.1.a or 5.1.b, the Permittee shall observe the next daylight flare event.
- 5.2. Record the following information for observed flare event:
 - a. the flare EU ID number;
 - b. results of the Method 9 observations;
 - c. reason for flaring;
 - d. date, beginning and ending time of event; and
 - e. volume of gas flared.
- 5.3. The records required by Condition 5.2 may be kept in electronic format.
- 5.4. Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available.
- 5.5. Include the following in the operating report required by Condition 80 for the period covered by the report:
 - a. copies of the records required by Condition 5.2; and
 - b. if an annual flare event observation required by Conditions 5.1.a or 5.1.b has not been fulfilled for the year and/or monitoring of a flare event is postponed, an explanation of the reason the event was not monitored.
- 5.6. Report under Condition 79:
 - a. whenever the visible emissions standard in Condition 1 is exceeded; or
 - b. the monitoring required under Condition 5.1 is not completed, except as allowed under Condition 5.4.

⁴ For purposes of this permit, a "flare event" is flaring of gas during daylight for greater than one hour as a result of scheduled release operations; i.e., maintenance or well testing activities. It does not include non-scheduled release operations; i.e., process upsets, emergency flaring, or de-minimis venting of gas incidental to normal operations.

- 5.7. If no flare events are monitored during a certification period, the Permittee shall certify compliance under Condition 81 with the visible emissions standard in Condition 1 based on reasonable inquiry.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(i)-(iii)]

Particulate Matter (PM) Emissions Standard

- 6. Industrial Process and Fuel-Burning Equipment PM Emissions.** The Permittee shall not cause or allow particulate matter emitted from EU IDs 2 through 5 and 7 through 19 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.040(j)(4), 50.055(b)(1), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(1)]

- 6.1. For EU IDs 2 through 4 and 7 through 13, the Permittee shall comply with Condition 1.1.
- 6.2. For EU ID 5, the Permittee shall comply with Condition 1.2.
- 6.3. For each of EU IDs 14 through 18, as long as actual emissions from the emissions unit are less than the significant emissions thresholds listed in 18 AAC 50.326(e) during any consecutive 12-month period, monitoring shall consist of an annual compliance certification under Condition 81 for the PM emissions standard based on reasonable inquiry. The Permittee shall report in the operating report under Condition 80 if any of EU IDs 14 through 18 reaches any of the significant emissions thresholds and monitor, record and report in accordance with Conditions 7 through 9 for the remainder of the permit term for that emissions unit.
- 6.4. For EU ID 19, the Permittee shall comply with Condition 5.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)]

PM MR&R

Liquid Fuel-Burning Engines and Turbines

- 7. PM Monitoring.** The Permittee shall conduct source tests on EU IDs 14 through 18 (when required by Condition 6.3), and EU ID 5 (when required by Condition 10.3.a), to determine the concentration of PM in the exhaust of each emissions unit as follows:

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(i)]

- 7.1. If the result of any Method 9 observation conducted under Condition 2.2 for any of EU IDs 14 through 18 is greater than the criteria of Condition 7.2.a or Condition 7.2.b, or if the Method 9 observation conducted under Condition 10.3 for EU ID 5 exceeds the standard in Condition 1, the Permittee shall, within six months of that Method 9 observation, either:

- a. take corrective action and observe the emissions unit exhaust under load conditions comparable to those when the criteria were exceeded, following 40 CFR 60, Appendix A-4 Method 9 for 18 minutes to obtain 72 consecutive 15-second opacity observations, to show that emissions are no longer greater than the criteria of Condition 7.2; or
 - b. except as exempted in Condition 7.4, conduct a PM source test according to requirements set out in Section 6.
- 7.2. Take corrective action or conduct a PM source test, in accordance with Condition 7.1, if any Method 9 observation under Condition 2.2 results in an 18-minute average opacity greater than
- a. 20 percent for an emissions unit with an exhaust stack diameter that is equal to or greater than 18 inches; or
 - b. 15 percent for an emissions unit with an exhaust stack diameter that is less than 18 inches, unless the Department has waived this requirement in writing.
- 7.3. During each one-hour PM source test run under Condition 7.1.b, observe the emissions unit exhaust for 60 minutes in accordance with Method 9 and calculate the highest 18-consecutive-minute average opacity measured during each one-hour test run. Submit a copy of these observations with the source test report.
- 7.4. The PM source test requirements in Condition 7.1.b are waived for an emissions unit if
- a. a PM source test on that unit has shown compliance with the PM standard during this permit term; or
 - b. corrective action was taken to reduce visible emissions and two consecutive 18-minute Method 9 visible emissions observations (as described in Condition 2.2) conducted thereafter within a six-month period show visible emissions less than the threshold in Condition 7.2.

8. PM Recordkeeping. The Permittee shall comply with the following:

- 8.1. Keep records of the results of any source test and visible emissions observations conducted under Condition 7.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(ii)]

9. PM Reporting. The Permittee shall report as follows:

- 9.1. Notify the Department of any Method 9 observation results that are greater than the threshold of either Condition 7.2.a or Condition 7.2.b within 30 days of the end of the month in which the observations occurred. Include the dates, EU ID(s), and results when an observed 18-minute average opacity was greater than an applicable threshold in Condition 7.2.
- 9.2. In each operating report under Condition 80, include:

- a. a summary of the results of any PM source test and visible emissions observations conducted under Condition 7; and
 - b. copies of any visible emissions observation results greater than the thresholds of Condition 7.2, if they were not already submitted.
- 9.3. Report in accordance with Condition 79:
- a. anytime the results of a PM source test exceed the PM emissions standard in Condition 6; or
 - b. if the requirements under Condition 7.1 were triggered and the Permittee did not comply on time with either Condition 7.1.a or 7.1.b. Report the deviation within 24 hours of the date compliance with Condition 7.1 was required.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(iii)]

Visible Emissions & PM MR&R

Dual Fuel-Burning Equipment

10. The Permittee shall monitor, record, and report the monthly hours of operation on EU ID 5 when operating on a back-up liquid fuel.
- 10.1. If EU ID 5 does not exceed 400 hours of operations per calendar year on a back-up liquid fuel, monitoring of compliance for visible emissions and PM shall consist of an annual certification under Condition 81 based on reasonable inquiry.
 - 10.2. For EU ID 5, notify the Department and begin monitoring the affected emissions unit in accordance with Condition 10.3 no later than 15 days after the end of a calendar month in which the cumulative hours of operation for the calendar year exceed any multiple of 400 hours on a back-up liquid fuel; or for an emissions unit with intermittent back-up fuel use, during the next scheduled operation on back-up liquid fuel.
 - 10.3. When required to do so by Condition 10.2, observe the emissions unit exhaust, following 40 CFR 60, Appendix A-4 Method 9, for 18 minutes to obtain 72 consecutive 15-second opacity observations.
 - a. If the observation exceeds the standard in Condition 1, monitor as described in Condition 7.
 - b. If the observation does not exceed the standard in Condition 1, no additional monitoring is required until the cumulative hours of operation exceed each subsequent multiple of 400 hours on back-up liquid fuel during a calendar year⁵.
 - 10.4. Keep records and report in accordance with Conditions 3, 4, 8, and 9.

⁵ If the requirement to monitor is triggered more than once in a calendar month, only one Method-9 observation is required to be conducted by the stated deadline for that month.

- 10.5. Report under Condition 79 if the Permittee fails to comply with Conditions 10.2, 10.3 or 10.4.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(i)-(iii)]

Sulfur Compound Emissions Standard

- 11. Sulfur Compound Emissions.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from EU IDs 2 through 5 and 7 through 19 listed in Table 1 to exceed 500 ppm averaged over three hours.

[18 AAC 50.040(j)(4), 50.055(c), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(1)]

Sulfur Compound Emissions MR&R

*Fuel Oil*⁶

- 12. Sulfur Compound Emissions Monitoring and Recordkeeping.** The Permittee shall monitor and keep records, as follows:

- 12.1. Comply with either Condition 12.1.a or Condition 12.1.b:

- a. For each shipment of fuel:

- (i) If the fuel grade requires a sulfur content 0.5 percent by weight (wt% S_{fuel}) or less, keep receipts that specify fuel grade and amount; or
- (ii) If the fuel grade does not require a sulfur content 0.5 wt% S_{fuel} or less, keep receipts that specify fuel grade and amount, and

(A) test the fuel for sulfur content; or

(B) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent; or

- b. Test the sulfur content of the fuel in each storage tank that supplies fuel to EU IDs 5 and 14 through 18 at least monthly.

- 12.2. Fuel testing under Condition 12.1.a or Condition 12.1.b must follow an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 CFR 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

- 12.3. If a shipment of fuel contains greater than 0.75 wt% S_{fuel} or if the results of a fuel sulfur content test indicate that the fuel contains greater than 0.75 wt% S_{fuel} , the Permittee shall calculate SO₂ emissions in parts per million (ppm) using either the SO₂ material balance calculation in Section 12 or Method 19 of 40 CFR 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a)(3).

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]

⁶ "Oil" means crude oil or petroleum or a liquid fuel derived from crude oil or petroleum, including distillate and residual oil, as defined in 40 CFR 60.41b.

[40 CFR 71.6(a)(3)(i) & (ii)]

13. Sulfur Compound Emissions Reporting. The Permittee shall report as follows:

- 13.1. If SO₂ emissions calculated under Condition 12.3 exceed 500 ppm, the Permittee shall report in accordance with Condition 79. When reporting under this condition, include the calculation under Condition 12.3.
- 13.2. The Permittee shall include in the operating report required by Condition 80 for each month covered by the report:
 - a. a list of the fuel grades received at the stationary source;
 - b. for any fuel received with a fuel sulfur content greater than 0.5 wt%S_{fuel}, the fuel sulfur content of the shipment;
 - c. the results of all fuel sulfur analyses conducted under Condition 12.1.a or Condition 12.1.b and documentation of the method(s) used to complete the analyses; and
 - d. for any fuel received with a sulfur content greater than 0.75 wt%S_{fuel}, the calculated SO₂ emissions in ppm calculated under Condition 12.3.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(c)]
[40 CFR 71.6(a)(3)(iii)]

Fuel Gas

14. Sulfur Compound Emissions Monitoring. The Permittee shall analyze a representative sample of the fuel annually to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or other listed method approved in 18 AAC 50.035(b)-(c) or 40 CFR 60.17 incorporated by reference in 18 AAC 50.040(a)(1).

15. Sulfur Compound Emissions Recordkeeping. The Permittee shall keep records of the annual sulfur content analysis required under Condition 14.

16. Sulfur Compound Emissions Reporting. The Permittee shall report as follows:

- 16.1. Report as excess emissions, in accordance with Condition 79, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of Condition 11.
- 16.2. Include copies of the records required by Condition 15 with the operating report required by Condition 80 for the period covered by the report.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]
[40 CFR 71.6(a)(3) & (c)(6)]

Preconstruction Permit⁷ Requirements

Ambient Air Quality Protection Requirements

⁷ "Preconstruction Permit" refers to federal PSD permits, state-issued permits-to-operate issued on or before January 17, 1997 (these permits cover both construction and operations), construction permits issued on or after January 18, 1997, and minor permits issued on or after October 1, 2004.

17. Liquid Fuel Sulfur Content Limit, Drill Rig EUs. To protect the 1-hour, 3-hour, 24-hour, and annual SO₂ Alaska Ambient Air Quality Standards (AAAQS), the Permittee shall limit the sulfur content of the liquid fuel burned by the Spartan 151 Drill Rig EUs listed in Table 2 while at Anna Platform to no more than 15 ppmw.

17.1. The Permittee shall do one of the following for each shipment of fuel for the Spartan 151 Drill Rig:

- a. If the fuel grade requires a sulfur content of 15 ppmw or less, keep receipts that specify the fuel grade and amount of fuel; or
- b. If the fuel grade does not require a sulfur content of 15 ppmw or less, keep receipts that specify the fuel grade and amount of fuel and:
 - (i) test the fuel for sulfur content; or
 - (ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
- c. Fuel testing under Condition 17.1 must follow an appropriate method listed in 18 AAC 50.035(b) through (c) or 40 CFR 60.17 incorporated by reference in 18 AAC 50.040(a)(1).
- d. The Permittee shall include in the operating report required by Condition 80:
 - (i) a list of the fuel grades received at the Spartan 151 Drill Rig during the reporting period; and
 - (ii) copies of any test results obtained in accordance with Condition 17.1.b.
- e. If the sulfur content of any liquid fuel exceeds the limit in Condition 17, the Permittee shall report under Condition 79.

[Condition 4, Minor Permit No. AQ0062MSS02, March 27, 2026]
[18 AAC 50.040(j)(4) & 50.326(j)]
[40 CFR 71.6(a)(1) & (a)(3)]

18. NRE Rated Capacity Limit, Drill Rig EUs. To protect the annual NO₂, 24-hour PM₁₀, annual PM_{2.5}, and 1-hour, 3-hour, 24-hour, and annual SO₂ AAAQS, the Permittee shall limit the cumulative rated capacity of the NREs on the Spartan 151 Drill Rig while at Anna Platform to no more than 8,615 horsepower (hp).⁸

18.1. The Permittee shall monitor, record, and report as follows:

⁸ The Lifeboat engines, EU IDs S13 and S14, are part of the Spartan 151 Drill Rig EU inventory but were excluded from Hilcorp's modeling analysis. Therefore, these EUs are not included in the NRE cumulative power rating limit in Condition 18. "These EUs are extremely small, rated at 36 hp each, and are intended to be used for brief periods and only in the event that an emergency evacuation is necessary. Therefore, their potential impact to ambient air quality is negligible." [Ref. Minor Permit No. AQ0066MSS02 TAR, Appendix A - Modeling Report, Section 3.6.1, April 5, 2019]

- a. Any time a change is made to the Spartan 151 Drill Rig NRE EU inventory, calculate and record the total nonroad engine rated capacity in hp (excluding EU IDs S13 and S14).
- b. If the Spartan 151 Drill Rig is at Anna Platform during the reporting period, include the rig's total NRE rated capacity in hp calculated under Condition 18.1.a in the operating report required by Condition 80.
- c. Report under Condition 79 any time the rig's total NRE rated capacity calculated under Condition 18.1.a exceeds the limit in Condition 18.

[Condition 5, Minor Permit No. AQ0062MSS02, March 27, 2026]
[18 AAC 50.040(j) & 50.326(j)]
[40 CFR 71.6(a)(1) & (a)(3)]

Insignificant Emissions Units

19. For emissions units at the stationary source that are insignificant as defined in 18 AAC 50.326(d) through (i) that are not listed in this permit, the following apply:

19.1. **Visible Emissions Standard.** The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from an industrial process or fuel-burning equipment, or an incinerator to reduce visibility through the exhaust effluent by more than 20 percent averaged over any six consecutive minutes.

[18 AAC 50.050(a) & 50.055(a)(1)]

19.2. **Particulate Matter Standard.** The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.

[18 AAC 50.055(b)(1)]

19.3. **Sulfur Compound Standard.** The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.

[18 AAC 50.055(c)]

19.4. **General MR&R for Insignificant Emissions Units.** The Permittee shall comply with the following:

- a. Submit the compliance certifications of Condition 81 based on reasonable inquiry;
- b. Comply with the requirements of Condition 62;
- c. Report in the operating report required by Condition 80 if an emissions unit has historically been classified as insignificant because of actual emissions less than the thresholds of 18 AAC 50.326(e) and current actual emissions have become greater than any of those thresholds; and

- d. No other monitoring, recordkeeping or reporting is required for insignificant emissions units to demonstrate compliance with the emissions standards under Conditions 19.1, 19.2, and 19.3.

[18 AAC 50.040(j)(4), 50.326(j)(3), & 50.346(b)(4)]
[40 CFR 71.6(a)(1) & (a)(3)]

Section 4. Federal Requirements

40 CFR Part 60 New Source Performance Standards (NSPS)

NSPS Subpart A – General Provisions

20. NSPS Subpart A Notification. Unless inapplicable pursuant to 40 CFR 60.7(h), for any affected facility⁹ or existing facility¹⁰ regulated under NSPS requirements in 40 CFR 60, the Permittee shall furnish the Administrator¹¹ 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 CFR 60.7(a) & (h), & 60.15(d), Subpart A]

20.1. 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 CFR 60.14(e). This notice shall be postmarked 60 days or as soon as practicable before the change is commenced and shall include¹²

- 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 CFR 60.7(a)(4), Subpart A]

20.2. 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 CFR 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,

⁹ “Affected facility” means, with reference to a stationary source, any apparatus to which a standard applies, as defined in 40 CFR 60.2.

¹⁰ “Existing facility” means, with reference to a stationary source, any apparatus of the type for which a standard is promulgated in 40 CFR 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 CFR 60.2.

¹¹ The Department defines the “the Administrator” to mean “the EPA and the Department.”

¹² The Department and EPA may request additional relevant information subsequent to this notice.

- 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.

21. 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 3 through 5, any malfunction of the air-pollution control equipment, or any periods during which a continuous monitoring system or monitoring device for EU IDs 3 through 5 is inoperative.

[18 AAC 50.040(a)(1)]
[40 CFR 60.7(b), Subpart A]

22. NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report. The Permittee shall submit excess emissions and monitoring systems performance (EEMSP)¹³ report and/or summary report form (see Condition 23) 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 CFR 60.7(c), Subpart A]

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

[40 CFR 60.7(c)(1), Subpart A]

22.2. Specific identification of each period of excess emissions that occurs during startups, shutdowns, and malfunctions of EU IDs 3 through 5; the nature and cause of any malfunction (if known), and the corrective action taken or preventative measures adopted; and

[40 CFR 60.7(c)(2), Subpart A]

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

[40 CFR 60.7(c)(4), Subpart A]

23. 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 CFR 60.7 (see Attachment A to the Statement of Basis) for each pollutant monitored for EU IDs 3 through 5. The report shall be submitted as follows:

¹³ The federal EEMSP report is not the same as the state excess emission report required by Condition 79. Excess emissions are defined in applicable subparts.

[18 AAC 50.040(a)(1)]
[40 CFR 60.7(c) & (d), Subpart A]

23.1. 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 22 is requested.

[40 CFR 60.7(d)(1), Subpart A]

23.2. 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 22.

[40 CFR 60.7(d)(2), Subpart A]

24. NSPS Subpart A Performance (Source) Tests. The Permittee shall conduct source tests according to 40 CFR 60.8 and Section 6 on any affected facility at such times as may be required by the Administrator, and shall provide the Department and EPA with a written report of the results of the source test.

[18 AAC 50.040(a)(1)]
[40 CFR 60.8(a), Subpart A]

25. NSPS Subpart A Good Air Pollution Control Practice (GAPCP). At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate EU IDs 3 through 5 including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The Administrator will determine whether acceptable operating and maintenance procedures are being used based on information available, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance records, and inspections of EU IDs 3 through 5.

[18 AAC 50.040(a)(1)]
[40 CFR 60.11(d), Subpart A]

26. 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 29 and 31, nothing in 40 CFR Part 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether EU IDs 3 through 5 would have been in compliance with applicable requirements of 40 CFR Part 60 if the appropriate performance or compliance test or procedure had been performed.

[18 AAC 50.040(a)(1)]
[40 CFR 60.11(g), Subpart A]

27. 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 29, 31, and 34. 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 CFR 60.12, Subpart A]

NSPS Subpart GG¹⁴ – Turbines, EU IDs 3, 4, and 5

28. NSPS Subpart GG Applicability. For EU IDs 3, 4, and 5 listed in Table 1, the Permittee shall comply with the applicable requirements of NSPS Subpart GG.

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]
[40 CFR 60.330(a) & (b), Subpart GG]

28.1. *Emergency Fuel¹⁵ Exemption.* Stationary gas turbines when fired with natural gas are exempt from NSPS Subpart GG NO_x standards under 40 CFR 60.332(a)(2), set out under Condition 29, when being fired with an emergency fuel. The dual fuel-fired turbine, EU ID 5, meets these criteria. The Permittee shall:

- a. include in the report required in Condition 22, each period during which an exemption is in effect; and
- b. for each period, the type, reasons, and duration of the firing of the emergency fuel shall be reported.

[40 CFR 60.332(k) & 60.334(j)(4), Subpart GG]

29. NSPS Subpart GG NO_x Standard. The Permittee shall not allow the exhaust gas concentration of NO_x, on a dry exhaust basis at 15 percent oxygen (O₂) and ISO standard day conditions,¹⁶ from EU IDs 3, 4, and 5 listed in Table 1 to exceed 150 ppmv.

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]
[40 CFR 60.332(a)(2) & (d), Subpart GG]

30. NSPS Subpart GG NO_x MR&R Requirements. The Permittee shall monitor, record, and report compliance with the respective Subpart GG NO_x standard under Condition 29, as follows:

30.1. **NO_x Monitoring.** The Permittee shall comply with the following:

[18 AAC 50.040(j) & 50.326(j)(4)]
[40 CFR 71.6(a)(3)(i) & (c)(6)]

¹⁴ The provisions of NSPS Subpart GG listed in Conditions 28 through 32 are current as amended through Feb. 27, 2014. 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.

¹⁵ “*Emergency fuel*” is a fuel fired by a gas turbine only during circumstances, such as natural gas supply curtailment or breakdown of delivery system, that make it impossible to fire natural gas in the gas turbine.

¹⁶ “*ISO (International Organization for Standardization) standard day conditions*” means 288 degrees Kelvin (59 degrees F), 60 percent relative humidity and 101.3 kilopascals (14.7 psi) pressure. [ref. 40 CFR 60.331(g)]

- a. **Periodic Testing.** For each turbine subject to Condition 29 that operates for 400 hours or more in any 12-month period during the life of this permit, the Permittee shall satisfy either Condition 30.1.a(i) or 30.1.a(ii).
- (i) For existing turbines whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the most stringent NO_x limit shown in Condition 29, the Permittee shall conduct a NO_x and O₂ source test under 40 CFR 60, Appendix A, Method 20, or Method 7E and either Method 3 or 3A, within the first applicable criteria below:
- (A) Within 5 years of the latest performance test; or
- (B) Within 1 year after exceeding 400 hours of operation in a 12-month period if the last source test occurred greater than 4 years prior to the exceedance.
- (ii) For existing turbines whose latest emissions source testing was certified as operating at greater than 90 percent of the most stringent NO_x limit shown in Condition 29, the Permittee shall conduct a NO_x and O₂ source test under 40 CFR 60, Appendix A, Method 20, or Method 7E and either Method 3 or 3A, annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the most stringent NO_x limit shown in Condition 29.
- b. **Substituting Test Data.** The Permittee may use results of a source test completed under Condition 30.1.a performed on only one of a group of turbines to satisfy the requirements of the condition for the other turbines in the group if:
- (i) the Permittee demonstrates that test results are less than or equal to 90 percent of the most stringent NO_x limit shown in Condition 29, and are projected under Condition 30.1.c to be less than or equal to 90 percent of the most stringent limit at peak load;
- (ii) for any source test conducted after the effective date of this permit, the Permittee identifies in a source test plan under Condition 71:
- (A) the turbine to be tested;
- (B) the other turbines in the group that are to be represented by the test; and
- (C) why the turbine to be tested is representative, including that each turbine in the group:
- (1) is located at a stationary source operated and maintained by the Permittee;
- (2) operates under close to identical ambient conditions;

- (3) is the same make and model and has identical injectors and combustor; and
 - (4) uses the same fuel type from the same supply origin.
- c. **Load.** The Permittee shall comply with the following:
 - (i) Conduct all tests under Condition 30.1 in accordance with 40 CFR 60.335, except as otherwise approved in writing by the Department or by EPA if the circumstances of the Department or EPA approval are still valid at the time. For the highest load condition, if it is not possible to operate the turbine during the test at peak load, the Permittee will test the turbine when operating at the highest load achievable by the turbine under the ambient and stationary source operating conditions in effect at the time of the test;
 - (ii) Demonstrate in the source test plan whether the test is scheduled when maximum NO_x emissions are expected;
 - (iii) If the highest operating rate tested is less than the peak load of the tested turbine or another turbine represented by the test data:
 - (A) for each such turbine the Permittee shall provide to the Department as an attachment to the source test report under Condition 73:
 - (1) additional test information from the manufacturer or from previous testing of units in the group of turbines; if using previous testing of the group of turbines, the information must include all available test data for the turbines in the group, and
 - (2) a demonstration based on the additional test information that projects the test results from Condition 30.1 to predict the highest load at which emissions will comply with the limit in Condition 29.
 - (B) the Permittee shall not operate any turbine represented by the test data at loads for which the Permittee's demonstration predicts that emissions will exceed the limit in Condition 29;
 - (C) the Permittee shall comply with a written finding prepared by the Department that:
 - (1) the information is inadequate for the Department to reasonably conclude that compliance is assured at any load greater than the test load, and that the Permittee must not exceed the test load;

- (2) the highest load at which the information is adequate for the Department to reasonably conclude that compliance assured is less than peak load, and the Permittee must not exceed the highest load at which compliance is predicted; or
- (3) the Permittee must retest during a period of greater expected demand on the turbine; and
- (D) the Permittee may revise a load limit by submitting results of a more recent Method 20, or Method 7E and either Method 3 or 3A, test done at a higher load, and, if necessary, the accompanying information and demonstration described in Condition 30.1.c(iii)(A); the new limit is subject to any new Department finding under Condition 30.1.c(iii)(C).
- (iv) In order to perform a source test required under Condition 30.1, the Permittee may operate a turbine at a higher load than that prescribed by Condition 30.1.c(iii).
- (v) For the purposes of Conditions 30.1 through 30.3, peak load means the hourly average load that is the smallest of:
 - (A) 100 percent of manufacturer's design capacity of the gas turbine at ISO standard day conditions;
 - (B) the highest load allowed by an enforceable condition that applies to the turbine; or
 - (C) the highest load possible considering permanent physical restraints on the turbine or the equipment which it powers.

30.2. **NO_x Recordkeeping.** The Permittee shall keep records as follows:

[18 AAC 50.040(j) & 50.326(j)(4)]
[40 CFR 71.6(a)(3)(ii) & (c)(6)]

- a. The Permittee shall comply with the following for each turbine for which a demonstration under Condition 30.1.c(iii) does not show compliance with the NO_x limit in Condition 29 at peak load:
 - (i) The Permittee shall keep records of:
 - (A) load; or
 - (B) as approved by the Department, surrogate measurements for load and the method for calculating load from those measurements.
 - (ii) Records in Condition 30.2.a shall be hourly or otherwise as approved by the Department.

- (iii) Within one month after submitting a demonstration under Condition 30.1.c(iii)(A)(2) that predicts that the highest load at which emissions will comply is less than peak load, or within one month of a Department finding under Condition 30.1.c(iii)(C), whichever is earlier, the Permittee shall propose to the Department how load or load surrogates will be measured, and shall propose and comply with a schedule for installing any necessary equipment and beginning monitoring. The Permittee shall comply with any subsequent Department direction on the load monitoring methods, equipment, or schedule.
- b. For any turbine subject to Condition 29, that will operate less than 400 hours in any 12 consecutive months, the Permittee shall keep monthly records of the hours of operation.

30.3. **NO_x Reporting.** The Permittee shall report as follows:

[18 AAC 50.040(j) & 50.326(j)(4)]
[40 CFR 71.6(a)(3)(iii) & (c)(6)]

- a. In each operating report under Condition 80 the Permittee shall list for each turbine tested or represented by testing at less than peak load and for which the Permittee must limit load under Condition 30.1.c(iii):
 - (i) the load limit;
 - (ii) the turbine identification; and
 - (iii) the highest load recorded under Condition 30.2.a during the period covered by the operating report.
- b. In each operating report under Condition 80 for each turbine for which Condition 30.1 has not been satisfied because the turbine normally operates less than 400 hours in any 12 consecutive months, the Permittee shall identify:
 - (i) the turbine;
 - (ii) the highest number of operating hours for any 12 consecutive months ending during the period covered by the report; and
 - (iii) any turbine that operated for 400 or more hours.
- c. The Permittee shall report under Condition 79 if:
 - (i) a test result exceeds the emission standard;
 - (ii) Method 20, or Method 7E and either Method 3 or 3A, testing is required under Condition 30.1.a(i) or 30.1.a(ii) but not performed; or
 - (iii) the turbine was operated at a load exceeding that allowed by Conditions 30.1.c(iii)(B) and 30.1.c(iii)(C); exceeding a load limit is deemed a single violation rather than a multiple violation of both monitoring and the underlying emission limit.

[18 AAC 50.220(a)-(c) & 50.040(a)(1)]
[40 CFR 60.8(b), Subpart A]

31. NSPS Subpart GG SO₂ Standard. For EU IDs 3, 4, and 5, the Permittee shall not burn in any stationary gas turbine any fuel which contains total sulfur in excess of 0.8 wt% S_{fuel} (8000 ppmw).

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]
[40 CFR 60.333(b), Subpart GG]

32. NSPS Subpart GG SO₂ MR&R Requirements. The Permittee shall monitor, record, and report compliance with the applicable Subpart GG SO₂ standard in Condition 31, as follows:

32.1. **SO₂ Monitoring.** The Permittee shall monitor compliance with the Subpart GG SO₂ standard in Condition 31, as follows:

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(i)]

- a. Monitor the total sulfur content of the fuel being fired in the turbine. Determine the sulfur content of the fuel using total sulfur methods described in Condition 32.2. Alternatively, if the total sulfur content of the gaseous fuel during the most recent performance test was less than 0.4 weight percent (4000 ppmw), the Permittee may use ASTM D4084-82, 94, D5504-01, D6228-98, or Gas Processors Association Standard 2377-86 (all of which are incorporated by reference-see 40 CFR 60.17), which measure the major sulfur compounds.

[40 CFR 60.334(h)(1), Subpart GG]

- b. For any turbine that commenced construction, reconstruction or modification after October 3, 1977, but before July 8, 2004, and for which a custom fuel monitoring schedule has previously been approved, the owner or operator may, without submitting a special petition to the Administrator, continue monitoring on this schedule.

[40 CFR 60.334(h)(4), Subpart GG]

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

[40 CFR 60.334(i), Subpart GG]

- (i) *Fuel oil.* For fuel oil, use one of the total sulfur sampling options and the associated sampling frequency described in sections 2.2.3, 2.2.4.1, 2.2.4.2, and 2.2.4.3 of Appendix D to 40 CFR Part 75 (i.e., flow proportional sampling, daily sampling, sampling from the unit's storage tank after each addition of fuel to the tank, or sampling each delivery prior to combining it with fuel oil already in the intended storage tank).

[40 CFR 60.334(i)(1), Subpart GG]

- (ii) *Gaseous fuel.* For owners and operators for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined and recorded once per unit operating day.

[40 CFR 60.334(i)(2), Subpart GG]

- (iii) *Custom schedules.* Notwithstanding the requirements of Condition 32.1.c(ii), 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 CFR 60.334(i)(3)(i) and (i)(3)(ii), 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 31. The two custom sulfur monitoring schedules set forth in 40 CFR 60.334(i)(3)(i)(A) through (D) and 60.334(i)(3)(ii) are acceptable without prior Administrative approval.

[40 CFR 60.334(i)(3), Subpart GG]

[EPA Custom Fuel Monitoring Schedule for Unocal Cook Inlet Facilities, 4/17/2007]

- 32.2. **Test Methods and Procedures.** If the owner or operator is required under Condition 32.1.c to periodically determine the sulfur content of the fuel combusted in the turbine, the owner or operator shall analyze the samples for the total sulfur content of the fuel as follows:

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(3)(i)]

[40 CFR 60.335(b)(10), Subpart GG]

- a. For liquid fuels, use ASTM D129-00, D2622-98, D4294-02, D1266-98, D5453-00, or D1552-01 (all of which are incorporated by reference, see 40 CFR 60.17); or

[40 CFR 60.335(b)(10)(i), Subpart GG]

- b. For gaseous fuels, use ASTM D1072-80, 90 (Reapproved 1994); D3246-81, 92, 96; D4468-85 (Reapproved 2000); or D6667-01 (all of which are incorporated by reference, see 40 CFR 60.17). The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis (with verification of the dilution ratio) may be used, subject to the prior approval of the Administrator.

[40 CFR 60.335(b)(10)(ii), Subpart GG]

- c. The fuel analyses may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.

[40 CFR 60.335(b)(11), Subpart GG]

- 32.3. **SO₂ Recordkeeping.** The Permittee shall keep records as required by Conditions 32.1 and 32.2, and in accordance with Condition 75.

[18 AAC 50.040(j) & 50.326(j)]
[40 CFR 71.6(a)(3)(ii) & 71.6(c)(6)]

32.4. SO₂ Reporting. The Permittee shall report as follows:

[18 AAC 50.040(a)(2)(V) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(iii) & (c)(6)]

- a. For each affected unit monitored periodically to determine the fuel sulfur content under Condition 32.1.a, the Permittee shall submit reports of excess emissions and monitor downtime, in accordance with 40 CFR 60.7(c) as summarized in Condition 22, except where otherwise approved by a custom fuel monitoring schedule. Excess emissions shall be reported for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under Condition 22, periods of excess emissions and monitor downtime that shall be reported are defined as follows:

[40 CFR 60.334(j), Subpart GG]

- (i) For samples of gaseous fuel obtained using daily sampling, flow proportional sampling, or sampling from the unit's storage tank, an excess emission occurs each unit operating hour included in the period beginning on the date and hour of any sample for which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8 weight percent and ending on the date and hour that a subsequent sample is taken that demonstrates compliance with the sulfur limit.
- (ii) A period of monitor downtime begins when a required sample is not taken by its due date. A period of monitor downtime also begins on the date and hour of a required sample, if invalid results are obtained. The period of monitor downtime shall include only unit operating hours, and ends on the date and hour of the next valid sample.

[40 CFR 60.334(j)(2)(i) & (iii), Subpart GG]

NSPS Subpart IIII¹⁷ – Compression Ignition Internal Combustion Engines (CI ICE), EU ID 16

- 33. NSPS Subpart IIII Applicability and General Compliance Requirements.** For EU ID 16 listed in Table 1, the Permittee shall comply with the applicable requirements for stationary CI ICE located in remote areas of Alaska¹⁸ whose construction¹⁹ commence after July 11, 2005, where the stationary CI ICE are manufactured after April 1, 2006 and is not a fire pump engine.

¹⁷ The provisions of NSPS Subpart IIII listed in Conditions 33 through 35 are current as amended through August 30, 2024. Should EPA promulgate revisions to this subpart, the Permittee shall be subject to the revised final provisions as promulgated and not the superseded provisions summarized in these conditions.

¹⁸ "Remote areas of Alaska," as defined in 40 CFR 60.4219.

¹⁹ For the purposes of NSPS Subpart IIII, the date that construction commences is the date the engine is ordered by the owner or operator as defined in 40 CFR 60.4200(a).

- 33.1. Comply with the applicable provisions of 40 CFR 60 Subpart A as specified in Table 8 to Subpart III, and applicable provisions of Subpart III as specified in Conditions 33.2 through 35.

[18 AAC 50.040(a)(2)(OO) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]
[40 CFR 60.4200(a)(2), 60.4218, & Table 8, Subpart III]

- 33.2. **NSPS Subpart III GAPCP.** The Permittee shall operate and maintain EU ID 16 and control device according to the manufacturer's written instructions, may change only those emission-related settings that are permitted by the manufacturer, and shall meet the requirements of Condition 34 and the applicable requirements of 40 CFR 1068. In addition, the Permittee shall operate and maintain EU ID 16 that achieves the emissions standards as required in Condition 34 over the entire life of the engine.

[40 CFR 60.4206, 60.4209, & 60.4211(a), Subpart III]

- 34. NSPS Subpart III Emission Standards.** The Permittee shall comply with the following emission standards:

[18 AAC 50.040(a)(2)(OO) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]

- 34.1. Exhaust emissions from EU ID 16 (stationary CI ICE with a displacement of less than 10 liters per cylinder located in remote areas of Alaska) shall not exceed the following applicable exhaust emission standards (Tier 1 standards for Nonroad Engines) in 40 CFR 1039 Appendix I for all pollutants, for the same displacement and maximum engine power, as follows:

- a. 1.3 g/kW-hr (or 1.0 g/hp-hr) for HC;
- b. 9.2 g/kW-hr (or 6.9 g/hp-hr) for NO_x;
- c. 11.4 g/kW-hr (or 8.5 g/hp-hr) for CO; and
- d. 0.54 g/kW-hr (or 0.40 g/hp-hr) for PM.

[40 CFR 60.4216(c) & 60.4205(a), Subpart III]
[40 CFR 1039 Appendix I, Table 1]

- 35. NSPS Subpart III Monitoring and Recordkeeping.** The Permittee shall comply with the following:

[18 AAC 50.040(a)(2)(OO) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(i) & (ii), & (c)(6)]

- 35.1. For EU ID 16, demonstrate compliance with the emission standards by keeping records of engine manufacturer data indicating compliance with the applicable emission standards in Condition 34.

[40 CFR 60.4211(b)(3), Subpart III]

40 CFR Part 63 National Emission Standards for Hazardous Air Pollutants (NESHAP)

NESHAP Subpart A – General Provisions

36. NESHAP Subpart A Applicability. The Permittee shall comply with the applicable requirements of 40 CFR 63 Subpart A in accordance with the provisions for applicability of Subpart A in

- 36.1. Table 2 to NESHAP Subpart HH for EU ID 27 listed in Table 1; and
- 36.2. Table 8 to NESHAP Subpart ZZZZ for EU IDs 7 through 15, 17, and 18 listed in Table 1.

[18 AAC 50.040(c)(1), (13), (23), & (39), 50.040(j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1) & (a)(3)]
[40 CFR 63.1-63.15, Subpart A]
[40 CFR 73.764(a) & Table 2, Subpart HH]
[40 CFR 63.6665 & Table 8, Subpart ZZZZ]

NESHAP Subpart HH²⁰ – Oil and Natural Gas Production Facilities, EU ID 27

37. NESHAP Subpart HH Applicability and General Requirements. The Permittee shall comply with the applicable Subpart HH requirements for the affected triethylene glycol (TEG) dehydration unit (EU ID 27) located at an oil and natural gas production facility classified as an area source of hazardous air pollutant (HAP) emissions.

[18 AAC 50.040(c)(13) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(1)]
[40 CFR 63.760(a) & (b)(2), Subpart HH]

- 37.1. Maintain records of the annual facility natural gas or hydrocarbon liquid throughput each year and upon request submit such records to the Administrator. If the facility annual natural gas or hydrocarbon liquid throughput calculated in 40 CFR 63.760(a)(1)(i)(A) or (a)(1)(i)(B), the maximum natural gas or hydrocarbon liquid throughput must be calculated using the higher throughput multiplied by a factor of 1.2. As an alternative to calculating the maximum natural gas or hydrocarbon liquid throughput, the owner or operator of a new or existing source may use the facility's design maximum natural gas or hydrocarbon liquid throughput to estimate the maximum potential emissions.

[40 CFR 63.760(a)(1) & (a)(1)(ii), Subpart HH]

- 37.2. Any source that determines it is not a major source but has actual emissions of 5 tons per year of more of a single HAP, or 12.5 tons per year or more of a combination of HAP (i.e., 50 percent of the major source thresholds), shall update its major source determination within 1 year of the prior determination and each year thereafter, using gas composition data measured during the preceding 12 months.

[40 CFR 63.760(c), Subpart HH]

²⁰ The provisions of NESHAP Subpart HH listed in Conditions 37 through 40 are current as amended through January 19, 2021. 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.

- 37.3. **NESHAP Subpart HH GAPCP.** At all times, the owner or operator must operate and maintain EU ID 27, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.

[40 CFR 63.764(j), Subpart HH]

38. **NESHAP Subpart HH General Standards.** For EU ID 27, the Permittee shall comply with the following, except as specified in Condition 38.2:

[18 AAC 50.040(c)(13) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(1)]

[40 CFR 63.760(b)(2), 63.764(d)(2), & (e)(1), Subpart HH]

- 38.1. **Glycol Circulation Rate.** Determine the optimum glycol circulation rate under 40 CFR 63.764(d)(2)(i).

- a. Operate the TEG dehydration unit such that the actual glycol circulation rate does not exceed the optimum glycol circulation rate determined in accordance with Condition 38.1. If the TEG dehydration unit is unable to meet the sales gas specification for moisture content using the glycol circulation rate determined in accordance with Condition 38.1, the owner or operator must
- (i) calculate an alternate circulation rate using GRI-GLYCalc™, Version 3.0 or higher; and
 - (ii) document why the TEG dehydration unit must be operated using the alternate circulation rate and submit this documentation with the initial notification in accordance with 40 CFR 63.775(c)(7).

[40 CFR 63.764(d)(2)(ii), Subpart HH]

- b. Maintain a record of the determination specified in Condition 38.1.a, in accordance with the requirements in Condition 40.3 and submit the Initial Notification in accordance with 40 CFR 63.775(c)(7). If operating conditions change and a modification to the optimum glycol circulation rate is required, the owner or operator shall prepare a new determination in accordance with Condition 38 or 38.1.a and submit the information specified under 40 CFR 63.775(c)(7)(ii) through (v).

[40 CFR 63.764(d)(2)(iii), Subpart HH]

- 38.2. **Exemption.** The owner or operator is exempt for the requirements in Conditions 38.1.a through 38.1.b if the criteria in Condition 38.2.a or 38.2.b are met, except that records of the determination must be maintained as required in Condition 40.2.

[40 CFR 63.764(e)(1), Subpart HH]

- a. The actual annual flowrate of natural gas to the glycol dehydration units is less than 85 thousand standard cubic meters per day, as determined by the procedures specified in Condition 39.1; or
- b. The actual annual average emissions of benzene from the glycol dehydration unit process vent to the atmosphere are less than 0.90 megagram per year, as determined by the procedures specified in Condition 39.2.

[40 CFR 63.764(e)(1)(i) & (ii), Subpart HH]

39. NESHAP Subpart HH Monitoring. The Permittee shall use the following procedures to determine the natural gas flowrate, benzene emissions, or BTEX emissions.

[18 AAC 50.040(c)(13) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(3)(i)]

[40 CFR 63.772(b)(1) & (2), Subpart HH]

39.1. Determine the actual flow rate of natural gas to EU ID 27 as follows:

- a. Install and operate a monitoring instrument that directly measures natural gas flowrate to the glycol dehydration unit with an accuracy of plus or minus 2 percent or better. Convert annual natural gas flowrate to a daily average by dividing the annual flowrate by the number of days per year the glycol dehydration unit processed natural gas.
- b. Document, to the Administrator's satisfaction, the actual annual average natural gas to the glycol dehydration unit.

[40 CFR 63.772(b)(1)(i) & (ii), Subpart HH]

39.2. Determine the actual average benzene or BTEX emissions from EU ID 27 using the procedures of either Condition 39.2.a or 39.2.b, either uncontrolled, or with federally enforceable controls in place, as follows:

- a. Determine actual average benzene or BTEX emissions using the model GRI-GLYCalc™, Version 3.0 or higher, and the procedures presented in the associated GRI-GLYCalc™ Technical Reference Manual. Inputs to the model shall be representative of actual operating conditions of the glycol dehydration unit and may be determined using the procedures documented in the Gas Research Institute (GRI) report entitled "Atmospheric Rich/Lean Method for Determining Glycol Dehydrator Emissions" (GRI-95/0368.1); or
- b. Determine an average mass rate of benzene or BTEX emissions in kilograms per hour through direct measurement using the methods in 40 CFR 63.772(a)(1)(i) or (ii), or an alternative method according to 40 CFR 63.7(f). Annual emissions in kilograms per year shall be determined by multiplying the mass rate by the number of hours the unit is operated per year. The result shall be converted to megagrams per year.

[40 CFR 63.772(b)(2)(i) & (ii), Subpart HH]

40. NESHAP Subpart HH Recordkeeping Requirements. The Permittee shall keep records as follows:

[18 AAC 50.040(c)(13) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(ii)]
[40 CFR 63.774(b), (d), (f), & (g), Subpart HH]

40.1. If EU ID 27 does not meet the exemption criteria in 38.2.a or 38.2.b, the Permittee shall:

a. Maintain all files of information (including all reports and notifications) required by NESHAP Subpart HH and the associated records specified in 40 CFR 63.10(b)(2) for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or period, in such a manner that they can be readily accessed.

[40 CFR 63.774(b)(1)(i) & (2), Subpart HH]

b. The most recent 12 months of records shall be retained on site or shall be accessible from a central location by computer or other means that provides access within 2 hours after a request; the remaining 4 years of records may be retained offsite.

[40 CFR 63.774(b)(1)(ii) & (iii), Subpart HH]

c. Records may be maintained in hard copy or computer-readable form including, but not limited to, on paper, microfilm, computer, floppy disk, magnetic tape, or microfiche.

[40 CFR 63.774(b)(1)(iv), Subpart HH]

40.2. If EU ID 27 meets the exemption criteria in Condition 38.2.a or 38.2.b, the Permittee shall maintain the records specified in Condition 40.2.a or 40.2.b, as appropriate. These records shall be retained for at least 5 years as required by Condition 75.

a. The actual annual average natural gas throughput (in terms of natural gas flow rate to the glycol dehydration unit per day) as determined in accordance with Condition 39.1; or

b. The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with Condition 39.2.

[18 AAC 50.040(j)(4) & 50.326(j)]

[40 C.F.R. 71.6(a)(3)(ii) & (c)(6)]

[40 CFR 63.774(d)(1)(i) & (ii), Subpart HH]

40.3. The Permittee must keep a record of the calculation used to determine the optimal glycol circulation rate in accordance with Condition 39.1 or 39.1.a, as applicable.

[40 CFR 63.774(f), Subpart HH]

NESHAP Subpart ZZZZ²¹ – Stationary RICE, EU IDs 7 through 18

41. NESHAP Subpart ZZZZ Applicability. The Permittee shall comply with applicable requirements for existing²² emergency (EU ID 13) and non-emergency (EU IDs 7 through 12, 14, 15, 17, and 18) and new²³ (EU ID 16) stationary reciprocating internal combustion engines (RICE) located at an area source of hazardous air pollutant (HAP) emissions.

- 41.1. For EU IDs 7 through 15, 17, and 18, existing stationary RICE units, the Permittee shall at all times comply with Conditions 42 through 46.
- 41.2. For EU ID 16, new stationary RICE unit, the Permittee shall meet the requirements of 40 CFR 63 Subpart ZZZZ by meeting the requirements of 40 CFR 60 Subpart IIII in Conditions 33 through 35. No further requirements apply for such engines under 40 CFR 63.

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(1)]

[40 CFR 63.6585(c), 63.6590(a)(1)(iii), (a)(2)(iii), & (c)(1), & 63.6605(a), Subpart ZZZZ]

42. NESHAP Subpart ZZZZ GACPC, Operation and Maintenance Requirements. The Permittee shall comply with the following:

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(1) & (3)(i)]

- 42.1. At all times, operate and maintain EU IDs 7 through 15, 17, and 18, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of EU IDs 7 through 15, 17, and 18.

[40 CFR 63.6605(b), Subpart ZZZZ]

- 42.2. The Permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to either:
 - a. the manufacturer's emission-related written instructions for operation and maintenance; or

²¹ The provisions of NESHAP Subpart ZZZZ listed in Conditions 41 through 46 are current as amended through August 30, 2024. Should EPA promulgate revisions to this subpart, the Permittee shall be subject to the revised final provisions as promulgated and not the superseded provisions summarized in these conditions.

²² In accordance with 40 CFR 63.6590(a)(1)(iii), a stationary RICE located at an area source of HAP emissions is “existing” if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.

²³ In accordance with 40 CFR 63.6590(a)(2)(iii), a stationary RICE located at an area source of HAP emissions is “new” if you commenced construction of the stationary RICE on or after June 12, 2006.

- b. a maintenance plan developed by the Permittee which must provide, to the extent practicable, for the maintenance and operation of the engine(s) in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e), 63.6640(a), & Table 6 (item 9), Subpart ZZZZ]

- 42.3. Minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes.

[40 CFR 63.6625(h) & Table 2d (item 1), Subpart ZZZZ]

43. NESHAP Subpart ZZZZ Work and Management Practices Standards. For EU IDs 7 through 15, 17, and 18, the Permittee shall comply with the following work and management practices:

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]

[40 CFR 71.6(a)(1) & (3)(i)]

[40 CFR 63.6603(a) & (b), 63.6640(a), & 63.6625(i), Subpart ZZZZ]

[40 CFR 63, Table 2d & Table 6, Subpart ZZZZ]

- 43.1. For EU IDs 14, 15, 17, and 18:

- a. Except during periods of startup, the Permittee shall meet the following requirements:
 - (i) Change oil and filter every 1,000 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, except as allowed by Condition 43.7;
 - (ii) Inspect air cleaner every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
 - (iii) Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[40 CFR 63, Table 2d (item 1 & Footnote 1), Subpart ZZZZ]

- 43.2. For EU IDs 7 through 12:

- a. Except during periods of startup, the Permittee shall meet the following requirements:
 - (i) Change oil and filter every 1,440 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, except as allowed by Condition 43.7;
 - (ii) Inspect spark plugs every 1,440 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and

- (iii) Inspect all hoses and belts every 1,440 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[40 CFR 63, Table 2d (item 10 & Footnote 1), Subpart ZZZZ]

43.3. For EU ID 13:

- a. Except during periods of startup, the Permittee shall meet the following requirements:
 - (i) Change oil and filter every 500 hours of operation or within 1 year + 30 days of the previous change, whichever comes first, except as allowed by Condition 43.7;
 - (ii) Inspect spark plugs every 1,000 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary; and
 - (iii) Inspect all hoses and belts every 500 hours of operation or within 1 year + 30 days of the previous inspection, whichever comes first, and replace as necessary.

[40 CFR 63, Table 2d (item 5 & Footnote 1), Subpart ZZZZ]

43.4. During periods of startup, the Permittee shall comply with Condition 42.3.

[40 CFR 63, Table 2d (item 1), Subpart ZZZZ]

43.5. If EU ID 13 is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required under Condition 43.3, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated.

[40 CFR 63, Table 2d (Footnote 2), Subpart ZZZZ]

43.6. Demonstrate continuous compliance with the requirements in Conditions 43.1 through 43.3 by complying with Condition 42.2.

[40 CFR 63.6640(a) & Table 6 (item 9), Subpart ZZZZ]

43.7. The Permittee has the option to utilize an oil analysis program in order to extend the specified oil and filter change requirements in Conditions 43.1.a(i), 43.2.a(i), and 43.3.a(i) as described below:

- a. The oil analysis must be performed at the same frequency specified for changing the oil and filter in Conditions 43.1.a(i), 43.2.a(i), and 43.3.a(i).

- b. The analysis program must, at a minimum, analyze the following three parameters: Total Base Number (for CI engines), Total Acid Number (for SI engines), viscosity, and percent water content. The condemning limits for these parameters are as follows:
 - (i) For EU IDs 14, 15, 17, and 18, Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
 - (ii) For EU IDs 7 through 13, Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new;
 - (iii) Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
 - (iv) Percent water content (by volume) is greater than 0.5.
- c. If all of the condemning limits in Conditions 43.7.b(i) through 43.7.b(iv) are not exceeded, the Permittee is not required to change the oil and filter.
- d. If any of the limits in Conditions 43.7.b(i) through 43.7.b(iv) is exceeded, the Permittee must change the oil and filter within 2 business days of receiving the results of the analysis.
 - (i) If the engine is not in operation when the results of the analysis are received, the Permittee must change the oil and filter within 2 business days or before commencing operation, whichever is later.
- e. The analysis program must be part of the maintenance plan for the engine.

[40 CFR 63.6625(i) & Table 2d (Footnote 1), Subpart ZZZZ]

44. NESHAP Subpart ZZZZ Monitoring Requirements. For the existing emergency stationary CI RICE, EU ID 13, the Permittee shall comply with the following:

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(i)]

44.1. Install a non-resettable hour meter if one is not already installed.

[40 CFR 63.6625(f), Subpart ZZZZ]

44.2. Operate according to the requirements in Conditions 44.3.a through 44.3.c.

- a. In order for the engine to be considered an emergency stationary RICE under this subpart, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in Conditions 44.3.a through 44.3.c, is prohibited.
- b. If the Permittee does not operate the engine according to the requirements in Conditions 44.3.a through 44.3.c, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines.

[40 CFR 63.6640(f), Subpart ZZZZ]

- 44.3. The Permittee may operate the emergency stationary RICE for maintenance checks and readiness testing, as specified in Condition 44.3.b, for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition 44.3.c counts as part of the 100 hours per calendar year allowed by this condition.
- a. There is no time limit on the use of the emergency engine in emergency situations.
 - b. The Permittee may operate the emissions unit for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State, or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of these units is limited to 100 hours per calendar year. The Permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
 - c. The Permittee may operate the emissions unit up to 50 hours per calendar year in non-emergency situations, but those 50 hours are counted towards the 100 hours per calendar year provided for maintenance and testing under Condition 44.3.b. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response.

[40 CFR 63.6640(f)(1), (2), (2)(i), & (4), Subpart ZZZZ]

45. NESHAP Subpart ZZZZ Recordkeeping Requirements. The Permittee shall keep records, as follows:

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(ii)]

- 45.1. If electing to operate and maintain EU IDs 7 through 15, 17, and 18 according to a maintenance plan developed by the Permittee as allowed under Condition 42.2.b, keep records of the maintenance conducted on EU IDs 7 through 15, 17, and 18 in order to demonstrate that the stationary RICE and after-treatment control device (if any) are operated and maintained according to the maintenance plan.
- [40 CFR 63.6655(e), Subpart ZZZZ]
- 45.2. If electing to utilize the oil analysis program described in Condition 43.7, keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil and filter changes for the engine.
- [40 CFR 63.6625(i) & (j), Subpart ZZZZ]
- 45.3. For EU ID 13, keep records of the hours of operation recorded through the non-resettable hour meter including:
- a. the calendar year total number of hours spent for emergency operation, including what classified the operation as emergency; and

- b. the calendar year total number of hours spent for non-emergency operation.
[40 CFR 63.6655(f), Subpart ZZZZ]

- 45.4. Keep records in a form suitable and readily available for expeditious review. Keep each record in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1), except that all records may be retained off site.
[40 CFR 63.6660 & Table 8, Subpart ZZZZ]
[40 CFR 63.10(b)(1), Subpart A]

46. NESHAP Subpart ZZZZ Reporting Requirements. The Permittee shall report, as follows:

[18 AAC 50.040(c)(23) & (j)(4), & 50.326(j)]
[40 CFR 71.6(a)(3)(iii) & (c)(6)]

- 46.1. Include in the operating report required by Condition 80 the following for the period covered by the report:
 - a. a report of any failure to perform the management practice on the schedule required in Condition 43.3 as a result of operating under the emergency exception allowed by Condition 43.5; include the Federal, State, or local law²⁴ under which the risk was deemed unacceptable.
[40 CFR 63, Table 2d (Footnote 2), Subpart ZZZZ]
 - b. a report of all deviations as defined in 40 CFR 63.6675 and of each instance in which an applicable requirement in 40 CFR 63, Subpart A (Table 8 to Subpart ZZZZ) was not met.
[40 CFR 63.6640(e) & 63.6650(f) & (i), Subpart ZZZZ]

40 CFR Part 61 NESHAP

NESHAP Subpart A – General Provisions & Subpart M – Asbestos

- 47. The Permittee shall comply with the applicable requirements set forth in 40 CFR 61.145, 61.150, and 61.152 of Subpart M, and the applicable sections set forth in 40 CFR 61, Subpart A and Appendix A.

[18 AAC 50.040(b)(1) & (2)(F), & 50.326(j)]
[40 CFR 61, Subparts A & M, and Appendix A]

40 CFR Part 82 Protection of Stratospheric Ozone

- 48. **Subpart F – Recycling and Emissions Reduction.** The Permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants set forth in 40 CFR 82, Subpart F.

[18 AAC 50.040(d) & 50.326(j)]
[40 CFR 82, Subpart F]

²⁴ The Permittee may provide the text of the law or a citation that the Department can use to access the law.

49. Subpart G – Significant New Alternatives. The Permittee shall comply with the applicable prohibitions set out in 40 CFR 82.174 (Protection of Stratospheric Ozone Subpart G – Significant New Alternatives Policy Program).

[18 AAC 50.040(d) & 50.326(j)]
[40 CFR 82.174(b)-(d), Subpart G]

50. Subpart H – Halons Emissions Reduction. The Permittee shall comply with the applicable prohibitions set out in 40 CFR 82.270 (Protection of Stratospheric Ozone Subpart H – Halon Emission Reduction).

[18 AAC 50.040(d) & 50.326(j)]
[40 CFR 82.270(b)-(f), Subpart H]

NESHAP Applicability Determination Requirements

51. The Permittee shall determine rule applicability and designation of affected sources under National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories (40 CFR 63) in accordance with the procedures described in 40 CFR 63.1(b).

51.1. If an owner or operator of a stationary source who is in the relevant source category determines that the source is not subject to a relevant standard or other requirement established under 40 CFR 63, the owner or operator must keep a record as specified in 40 CFR 63.10(b)(3).

51.2. If a source becomes affected by an applicable subpart of 40 CFR 63, the owner or operator shall comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 CFR 63.6(c).

51.3. After the effective date of any relevant standard promulgated by the Administrator under this part, an owner or operator who constructs a new affected source that is not major-emitting or reconstructs an affected source that is not major-emitting that is subject to such standard, or reconstructs a source such that the source becomes an affected source subject to the standard, must notify the Administrator and the Department of the intended construction or reconstruction. The notification must be submitted in accordance with the procedures in 40 CFR 63.9(b).

[18 AAC 50.040(c)(1), 50.040(j), & 50.326(j)]
[40 CFR 71.6(a)(3)(ii)]
[40 CFR 63.1(b) & (c)(5), 63.5(b)(4), 63.6(c)(1), 63.9(b), & 63.10(b)(3), Subpart A]

Section 5. General Conditions

Standard Terms and Conditions

52. 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.

[18 AAC 50.326(j)(3) & 50.345(a) & (e)]

53. The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and re-issuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.326(j)(3) & 50.345(a) & (f)]

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

[18 AAC 50.326(j)(3) & 50.345(a) & (g)]

55. Administration Fees. The Permittee shall pay to the Department all assessed permit administration fees. Administration fee rates are set out in 18 AAC 50.400-403.

[18 AAC 50.326(j)(1), 50.400, & 50.403]
[AS 37.10.052(b) & AS 46.14.240]

56. Assessable Emissions. For each period from July 1 through the following June 30, the Permittee shall pay to the Department an annual emission fee 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:

56.1. potential to emit of 634.24 TPY; or

56.2. 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.

[18 AAC 50.040(j)(4), 50.035, 50.326(j)(1) & (3), 50.346(b)(1), 50.410, & 50.420]

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

- 57.1. 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 56.2. 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/>.
- 57.2. 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.
- 57.3. If no estimate 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 56.1.

[18 AAC 50.040(j)(4), 50.326(j)(1) & (3), 50.346(b)(1), 50.410, & 50.420]

58. Good Air Pollution Control Practice (GAPCP). The Permittee shall do the following for EU IDs 2 and 19:

- 58.1. Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
- 58.2. Keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; and
- 58.3. Keep a copy of either the manufacturer's or the operator's maintenance procedures.

[18 AAC 50.326(j)(3) & 50.346(b)(5)]

59. Dilution. The Permittee shall not dilute emissions with air to comply with this permit. Monitoring shall consist of an annual certification that the Permittee does not dilute emissions to comply with this permit.

[18 AAC 50.045(a)]

60. Reasonable Precautions to Prevent Fugitive Dust. A person who causes or permits bulk materials to be handled, transported, or stored, or who engages in an industrial activity or construction project shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air.

- 60.1. The Permittee shall keep records of
 - a. complaints received by the Permittee and complaints received by the Department and conveyed to the Permittee; and
 - b. any additional precautions that are taken
 - (i) to address complaints described in Condition 60.1.a or to address the results of Department inspections that found potential problems; and
 - (ii) to prevent future dust problems.

60.2. The Permittee shall report according to Condition 62.3.

[18 AAC 50.045(d), 50. 326(j)(3), & 50.346(c)]

61. Stack Injection. The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a stationary source constructed or modified after November 1, 1982, except as authorized by a construction permit, Title V permit, or air quality control permit issued before October 1, 2004.

[18 AAC 50.055(g)]

62. 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 AAC 50.040(j)(4), 50.110, 50.326(j)(3), & 50.346(a)]

[40 CFR 71.6(a)(3)]

62.1. 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 62.
- 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 62; or
 - (ii) the Department notifies the Permittee that it has found a violation of Condition 62.

62.2. 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 62; and
- d. any corrective actions taken or planned for complaints attributable to emissions from the stationary source.

62.3. Reporting. The Permittee shall report as follows:

- a. With each stationary source operating report under Condition 80, 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 79.

63. Technology-Based Emission Standard. If an unavoidable emergency, malfunction (as defined in 18 AAC 50.235(d)), or non-routine repair (as defined in 18 AAC 50.990(64)), causes emissions in excess of a technology-based emission standard²⁵ listed in Conditions 29, 31, and 48 (refrigerants), the Permittee shall

- 63.1. take all reasonable steps to minimize levels of emissions that exceed the standard; and
- 63.2. report in accordance with Condition 79.1.b; the report must include information on the steps taken to mitigate emissions and corrective measures taken or to be taken.

[18 AAC 50.235(a), 50.326(j)(4), & 50.040(j)(4)]
[40 CFR 71.6(c)(6)]

Open Burning Requirements

64. Open Burning. The Permittee shall not conduct open burning at the stationary source.

[18 AAC 50.065, 50.040(j), & 50.326(j)]
[40 CFR 71.6(a)(3)]

²⁵ As defined in 18 AAC 50.990(106), the term “*technology-based emission standard*” means a best available control technology (BACT) standard; a lowest achievable emission rate (LAER) standard; a maximum achievable control technology (MACT) standard established under 40 CFR 63, Subpart B, adopted by reference in 18 AAC 50.040(c); a standard adopted by reference in 18 AAC 50.040(a) or (c); and any other similar standard for which the stringency of the standard is based on determinations of what is technologically feasible, considering relevant factors.

Section 6. General Source Testing and Monitoring Requirements

65. Requested Source Tests. In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a) & 50.345(a) & (k)]

66. Operating Conditions. Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing

[18 AAC 50.220(b)]

66.1. at a point or points that characterize the actual discharge into the ambient air; and

66.2. at the maximum rated burning or operating capacity of the emissions unit or another rate determined by the Department to characterize the actual discharge into the ambient air.

67. Reference Test Methods. The Permittee shall use the following test methods when conducting source testing for compliance with this permit:

67.1. Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 CFR 60.

[18 AAC 50.040(a) & 50.220(c)(1)(A)]
[40 CFR 60]

67.2. Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 CFR 63.

[18 AAC 50.040(c) & 50.220(c)(1)(C)]
[40 CFR 63]

67.3. Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9. The Permittee may use the form in Section 11 to record data.

[18 AAC 50.030 & 50.220(c)(1)(D)]

67.4. Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 CFR 60, Appendix A.

[18 AAC 50.040(a)(3) & 50.220(c)(1)(E)]
[40 CFR 60, Appendix A]

67.5. Source testing for emissions of PM₁₀ and PM_{2.5} must be conducted in accordance with the procedures specified in 40 CFR 51, Appendix M, Methods 201 or 201A and 202.

[18 AAC 50.035(b)(2) & 50.220(c)(1)(F)]
[40 CFR 51, Appendix M]

67.6. Source testing for emissions of any pollutant may be determined using an alternative method approved by the Department in accordance with 40 CFR 63 Appendix A, Method 301.

[18 AAC 50.040(c)(32) & 50.220(c)(2)]
[40 CFR 63, Appendix A, Method 301]

68. Excess Air Requirements. To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific emissions unit type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).

[18 AAC 50.220(c)(3) & 50.990(102)]

69. Test Exemption. The Permittee is not required to comply with Conditions 71, 72, and 73 when the exhaust is observed for visible emissions by Method 9 Plan (Condition 2.2).

[18 AAC 50.345(a)]

70. Test Deadline Extension. The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.

[18 AAC 50.345(a) & (l)]

71. Test Plans. Except as provided in Condition 69, before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the emissions unit will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under Condition 65 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.

[18 AAC 50.345(a) & (m)]

72. Test Notification. Except as provided in Condition 69, at least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.

[18 AAC 50.345(a) & (n)]

73. Test Reports. Except as provided in Condition 69, within 60 days after completing a source test, the Permittee shall submit one certified copy of the results in the format set out in the *Source Test Report Outline*, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in Condition 76. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.

[18 AAC 50.345(a) & (o)]

74. Particulate Matter Calculations. In source testing for compliance with the particulate matter standards in Conditions 6 and 19.2, the three-hour average is determined using the average of three one-hour test runs.

[18 AAC 50.220(f)]

Section 7. General Recordkeeping and Reporting Requirements

Recordkeeping Requirements

75. The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:

75.1. Copies of all reports and certifications submitted pursuant to this section of the permit; and

75.2. 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 analyses;
- d. the analytical techniques or methods used;
- e. the results of such analyses; and
- f. the operating conditions as existing at the time of sampling or measurement.

[18 AAC 50.040(a)(1) & (j)(4), & 50.326(j)]
[40 CFR 60.7(f), Subpart A, 40 CFR 71.6(a)(3)(ii)(A) & (B)]

Reporting Requirements

76. 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 emission 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.

76.1. 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.

[18 AAC 50.205, 50.326(j)(3), 50.345(a) & (j), & 50.346(b)(10)]

77. 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.

77.1. 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/>.

[18 AAC 50.326(j)(3) & 50.346(b)(10)]

78. 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 and 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.

[18 AAC 50.345(a) & (i), 50.200, & 50.326(a) & (j)]
[40 CFR 71.5(a)(2) & 71.6(a)(3)]

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

79.1. **Excess Emissions Reporting.** Except as provided in Condition 62, 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 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 79.1.d.
- d. Report all other excess emissions not described in Conditions 79.1.a, 79.1.b, and 79.1.c 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 80 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.

[18 AAC 50.235(a)(2), 50.240(c), 50.326(j)(3), & 50.346(b)(2)]

79.2. Permit Deviations Reporting. For permit deviations that are not “excess emissions,” as defined under 18 AAC 50.990:

- a. Report according to the required deadline for failure to monitor, as specified in other applicable conditions of this permit (Conditions 4.3.b and 9.3.b).
- b. 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 80 for permit deviations that occurred during the period covered by the report, whichever is sooner.

[18 AAC 50.326(j)(3) & 50.346(b)(2)]

79.3. 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 13 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/>.

[18 AAC 50.326(j)(3), 50.346(b)(3), & 50.270(a), (b), & (c)]

80. Operating Reports. During the life of this permit²⁶, the Permittee shall submit to the Department an operating report in accordance with Conditions 76 and 77 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.

- 80.1. 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.
- 80.2. When excess emissions or permit deviations that occurred during the reporting period are not included with the operating report under Condition 80.1, the Permittee shall identify
 - a. the date of the excess emissions or permit deviation;
 - b. the equipment involved;
 - c. the permit condition affected;

²⁶ “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.

- 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
- 80.3. When excess emissions or permit deviation reports have already been reported under Condition 79 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.
- 80.4. The operating report must include, for the period covered by the report, a listing of emissions monitored under Conditions 2.2.e, 7.2, and 30.1.a which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report
- a. the date of the emissions;
 - b. the equipment involved;
 - c. the permit condition affected; and
 - d. the monitoring result which triggered the additional monitoring.
- 80.5. **Transition from expired to renewed permit.** For the first period of this renewed operating permit, also provide the previous permit's operating report elements covering that partial period immediately preceding the effective date of this renewed permit.

[18 AAC 50.346(b)(6) & 50.326(j)]
[40 CFR 71.6(a)(3)(iii)(A)]

81. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the Department an annual compliance certification report according to Condition 77.

- 81.1. Certify the compliance status of the stationary source over the preceding calendar year consistent with the monitoring required by this permit, as follows:
- a. identify each term or condition set forth in Section 3 through Section 9, that is the basis of the certification;
 - b. briefly describe each method used to determine the compliance status;
 - c. state whether compliance is intermittent or continuous; and
 - d. identify each deviation and take it into account in the compliance certification.

- 81.2. **Transition from expired to renewed permit.** For the first period of this renewed operating permit, also provide the previous permit's annual compliance certification report elements covering that partial period immediately preceding the effective date of this renewed permit.
- 81.3. In addition, submit a copy of the report directly to the Clean Air Act Compliance Manager, US EPA Region 10, ATTN: Air Toxics and Enforcement Section, Mail Stop: 20-C04, 1200 Sixth Avenue, Suite 155, Seattle, WA 98101-3188, or electronically to the EPA's CDX and CEDRI online reporting system accessible via cdx.epa.gov.

[18 AAC 50.205, 50.345(a) & (j), & 50.326(j)]
[40 CFR 71.6(c)(5)]

82. Regional Haze Visibility Protection Area. The Permittee shall comply as follows:

- 82.1. Maintain onsite for 10 years, records of any maintenance to any significant emissions unit that is not an insignificant emissions unit under 18 AAC 50.326(d) – (i), that has or may have an effect on any emission that affects visibility of Class I areas, including critical maintenance that has occurred or is planned to occur, including all schedules, practices, and maintenance records for each significant emissions unit and control device according to the manufacturer's emission-related written instructions.

[18 AAC 50.025(a)(4), 50.265(1), & 50.326(j)]
[40 C.F.R. 71.6(a)(3)(iii)(A)]

83. 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:

- 83.1. The Permittee shall report the annual emissions and the required data elements under Condition 83.2 every third year for the previous calendar year as scheduled by the EPA.²⁷
- 83.2. For each emissions unit and the stationary source, include in the report the required data elements²⁸ 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>.

²⁷ The calendar years for which reports are required are based on the triennial reporting schedule in 40 CFR 51.30(b)(1), which requires states to report emissions data to the EPA for inventory years 2011, 2014, 2017, 2020, 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 2020 is due April 30, 2021, triennial emission inventory report for 2023 is due April 30, 2024, etc.).

²⁸ The required data elements to be reported to the EPA are outlined in 40 CFR 51.15 and Tables 2a and 2b to Appendix A of 40 CFR 51 Subpart A.

- 83.3. 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/>.

[18 AAC 50.040(j)(4), 50.200, 50.275, 50.326(j)(3), & 50.346(b)(8)]
[40 CFR 51.15, 51.30(a)(1) & (b)(1), & Appendix A to 40 CFR 51 Subpart A]

84. Consistency of Reporting Methodologies. Regardless of permit classification, as of September 7, 2022, all stationary sources operating in the state 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 CFR Part 51, Subpart A.

- 84.1. For the purposes of reporting actual or assessable emissions required under Condition 82 and Condition 56.2, the Permittee shall use consistent pollutant-specific emission factors and calculation methods for all reporting requirements for the stationary source.

[18 AAC 50.040(j)(4), 50.200, 50.275, 50.326(j)(3), & 50.346(b)(8)]
[40 CFR 51.15, 51.30(a)(1) & (b)(1), & Appendix A to 40 CFR 51 Subpart A]

85. NSPS and NESHAP Reports and Waivers. The Permittee shall comply with the following:

- 85.1. **Reports.** Except for previously submitted reports and federal reports and notices submitted through EPA's Central Data Exchange (CDX) and Compliance and Emissions Data Reporting Interface (CEDRI) online reporting system, attach to the operating report required by Condition 80 for the period covered by the report, a copy of any NSPS and NESHAP reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10. For reports previously submitted to ADEC or submitted through CDX/CEDRI, state in the operating report the date and a brief description of each of the online reports submitted during the reporting period.

- 85.2. **Waivers.** Upon request by the Department, provide a written copy of any EPA-granted alternative monitoring requirement, custom monitoring schedule or waiver of the federal emission standards, recordkeeping, monitoring, performance testing, or reporting requirements. The Permittee shall keep a copy of each U.S. EPA-issued monitoring waiver or custom monitoring schedule with the permit.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]
[40 CFR 60.13, 63.10(d) & (f), & 40 CFR 71.6(c)(6)]

86. Federal Electronic Reporting Allowance. Effective September 25, 2024, the Permittee may electronically submit in an acceptable digital format reports, notifications, or other required submission types in certain 40 CFR 59, 60, 61, 62, and 63 Subparts that do not already have electronic reporting requirements (i.e., paper reports, notifications, or other submission types), via the CEDRI on the EPA's CDX, or to another EPA managed electronic document receiving system that may be designated for the receipt of specified submissions in the future.

- 86.1. Additionally, performance test reports that do not already have Cross-Media Electronic Reporting Rule (CROMERR) compliant electronic reporting requirements may utilize the Electronic Reporting Tool (ERT) (see <https://www.epa.gov/electronic-reporting-air-emissions/electronic-reporting-tool-ert>) to submit those reports to CEDRI in the form of an ERT submission package.
- 86.2. When a report, notification, or other submission type submitted under this new electronic submission option contains confidential business information (CBI), a file with the CBI omitted or redacted must be submitted to the CEDRI system and a separate, complete submission containing the claimed CBI information must be submitted through the described CBI submission process.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]

[40 CFR 71.6(c)(6)]

[40 CFR 3.2(a)(2), Cross-Media Electronic Reporting; 89 Fed. Reg. 78300 (September 25, 2024)]

Section 8. Permit Changes and Renewal

87. Permit Applications and Submittals. The Permittee shall comply with the following requirements for submitting application information to the EPA:

- 87.1. The Permittee shall provide a copy of each application for modification or renewal of this permit, including any compliance plan, or application addenda, at the time the application or addendum is submitted to the Department;
- 87.2. The information shall be submitted, as follows: (1) to the EPA's CDX and CEDRI online reporting system accessible via cdx.epa.gov, or (2) as an email attachment to the EPA's air permits mailbox (R10_Air_Permits@epa.gov), or (3) as a hardcopy by mail (only if absolutely necessary) to the Part 70 Operating Permit Program, US EPA Region 10, Air Permits and Toxics Branch, Mail Stop: 15-H13, 1200 Sixth Avenue, Suite 155, Seattle, WA 98101-3188, listed in order of EPA's preference;
- 87.3. To the extent practicable, the Permittee shall provide to EPA applications in portable document format (pdf), MS Word format (.doc), or other computer-readable format compatible with EPA's national database management system; and
- 87.4. The Permittee shall maintain records as necessary to demonstrate compliance with this condition.

[18 AAC 50.040(j)(7), 50.326(a) & (j)(3), & 50.346(b)(7)]
[40 CFR 71.10(d)(1)]

88. Emissions Trading. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in the permit.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]
[40 CFR 71.6(a)(8)]

89. Off Permit Changes. The Permittee may make changes that are not addressed or prohibited by this permit other than those subject to the requirements of 40 CFR Parts 72 through 78 or those that are modifications under any provision of Title I of the Act to be made without a permit revision, provided that the following requirements are met:

- 89.1. Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition;
- 89.2. Provide contemporaneous written notice to EPA and the Department of each such change, except for changes that qualify as insignificant under 18 AAC 50.326(d) – (i). Such written notice shall describe each such change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change;
- 89.3. The change shall not qualify for the shield under 40 CFR 71.6(f); and

- 89.4. The Permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]
[40 CFR 71.6(a)(12)]

90. Operational Flexibility. The Permittee may make CAA Section 502(b)(10)²⁹ changes within the permitted stationary source without requiring a permit revision if the changes are not modifications under any provision of Title I of the Act and the changes do not exceed the emissions allowable under this permit (whether expressed therein as a rate of emissions or in terms of total emissions).

- 90.1. The Permittee shall provide EPA and the Department with a written notification no less than seven days in advance of the proposed change.
- 90.2. For each such change, the notification required by Condition 90.1 shall include a brief description of the change within the permitted stationary source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- 90.3. The permit shield described in 40 CFR 71.6(f) shall not apply to any change made pursuant to Condition 90.

[18 AAC 50.040(j)(4) & 50.326(j)(4)]
[40 CFR 71.6(a)(13)]

91. Permit Renewal. To renew this permit, the Permittee shall submit to the Department an application under 18 AAC 50.326 no sooner than **<18 months before the expiration date of this permit>** and no later than **<6 months before the expiration date of this permit>**, and according to the submittal instructions in Conditions 77 and 87. The renewal application shall be complete before the permit expiration date listed on the cover page of this permit. Permit expiration terminates the stationary source's right to operate unless a timely and complete renewal application has been submitted consistent with 40 CFR 71.7(b) and 71.5(a)(1)(iii).

[18 AAC 50.040(j)(3) & 50.326(c) & (j)(2)]
[40 CFR 71.5(a)(1)(iii) & 71.7(b) & (c)(1)(ii)]

²⁹ As defined in 40 CFR 71.2, CAA Section 502(b)(10) changes are changes that contravene an express permit term. Such changes do not include changes that would violate applicable requirements or contravene federally enforceable permit terms and conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements.

Section 9. Compliance Requirements

General Compliance Requirements

92. Compliance with permit terms and conditions is considered to be compliance with those requirements that are

- 92.1. included and specifically identified in the permit; or
- 92.2. determined in writing in the permit to be inapplicable.

[18 AAC 50.326(j)(3) & 50.345(a) & (b)]

93. 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

- 93.1. an enforcement action;
- 93.2. permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or
- 93.3. denial of an operating permit renewal application.

[18 AAC 50.040(j), 50.326(j), & 50.345(a) & (c)]

94. For applicable requirements with which the stationary source is in compliance, the Permittee shall continue to comply with such requirements.

[18 AAC 50.040(j)(3) & (4), & 50.326(j)]
[40 CFR 71.6(c)(3) & 71.5(c)(8)(iii)(A)]

95. For applicable requirements that will become effective during the permit term, the Permittee shall meet such requirements on a timely basis.

[18 AAC 50.040(j)(3) & (4), & 50.326(j)]
[40 CFR 71.6(c)(3) & 71.5(c)(8)(iii)(B)]

96. 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.

[18 AAC 50.326(j)(3) & 50.345(a) & (d)]

97. 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

- 97.1. enter upon the premises where a source subject to the permit is located or where records required by the permit are kept;
- 97.2. have access to and copy any records required by the permit;
- 97.3. inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and

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

[18 AAC 50.326(j)(3) & 50.345(a) & (h)]

98. For applicable requirements that will become effective during the permit term, the Permittee shall meet such requirements on a timely basis.

[18 AAC 50.040(j) & 50.326(j)(3)]
[40 CFR 71.6(c)(3) & 71.5(c)(8)(iii)(B)]

Section 10. Permit As Shield from Inapplicable Requirements

In accordance with AS 46.14.290, and based on information supplied in the permit application, this section of the permit contains the requirements determined by the Department not to be applicable to the stationary source.

99. Nothing in this permit shall alter or affect the following:

- 99.1. The provisions of Section 303 of the Act (emergency orders), including the authority of the Administrator under that section; or
- 99.2. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.

[18 AAC 50.040(j)(4) & 50.326(j)]
 [40 CFR 71.6(f)(3)(i) & (ii)]

100. Table 3 identifies the emissions units that are not subject to the specified requirements at the time of permit issuance. If any of the requirements listed in Table 3 becomes applicable during the permit term, the Permittee shall comply with such requirements on a timely basis including, but not limited to, providing appropriate notification to EPA, obtaining a construction permit and/or an operating permit revision.

[18 AAC 50.040(j)(4) & 50.326(j)]
 [40 CFR 71.6(f)(1)(ii)]

Table 3 - Permit Shields Granted

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
Stationary Source-wide	40 CFR 60 Subparts D, Db, E, CCCC, DDDD, EEEE, FFFF	No affected EUs within the permitted stationary source.
	40 CFR 60 Subpart Dc	No affected EUs within the permitted stationary source. The insignificant heaters are not affected facilities because they are less than 10 MMBtu/hr.
	40 CFR 60 Subparts OOOO, OOOOa, OOOOb	NSPS Subparts OOOO, OOOOa, and OOOOb apply only to onshore affected facilities. Anna Platform is on the outer continental shelf, so it is not an onshore facility as defined in 40 CFR 60.5430, 60.5430a, and 60.5430b.
	40 CFR 63 Subpart HHH	This stationary source is not a “major source” of HAPs as defined in 40 CFR 63.1271.
	40 CFR 63 Subpart JJJJJ	No affected EUs within the permitted stationary source. The insignificant heaters and boiler are not boilers per the definition in 40 CFR 63.11237.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
Storage Tanks	40 CFR 60 Subparts K, Ka	No affected EUs within the permitted stationary source. The crude oil and produced water tanks were not constructed, modified, or reconstructed after May 19, 1978. Per 40 CFR 60.110(a), affected facilities are petroleum liquid storage tanks with a capacity greater than 40,000 gallons. Per 40 CFR 60.111(b), petroleum liquids do not include diesel fuel. The rest of the tanks are either less than 40,000 gallons or storing diesel fuel.
	40 CFR 60 Subpart Kb	No affected EUs within the permitted stationary source. The crude oil and produced water tanks were not constructed, modified, or reconstructed after July 23, 1984. Per 40 CFR 60.110(b), affected facilities are volatile organic liquid storage tanks with a capacity greater than or equal to 75 cubic meters (19,800 gallons). The rest of the tanks are less than 19,800 gallons.
	40 CFR 60, Subpart Kc	No affected EUs within the permitted stationary source. Per 40 CFR 60.110c, affected facilities are volatile organic liquid storage tanks with a capacity greater than or equal to 20,000 gallons which were constructed, reconstructed, or modified after October 4, 2023. All tanks are either less than 20,000 gallons or commenced construction prior to October 4, 2023 and not modified or reconstructed thereafter.
2	40 CFR 60 Subpart GG	EU ID 2 was not constructed, modified, or reconstructed after October 3, 1977.
3, 4, 5	40 CFR 60 Subpart GG, 60.334(a), (b), (d), & (g) 40 CFR 60 Subpart GG, 60.334(e) & (f)	EU IDs 3, 4, and 5 do not use a continuous emissions monitoring system (CEMS) or water/steam injection. EU IDs 3, 4, and 5 commenced construction before July 8, 2004.
3, 4, 5	40 CFR 60 Subpart GG, 60.334(h)(2)	No fuel bound nitrogen allowance is claimed for EU IDs 3, 4, and 5, so nitrogen content of the fuel does not have to be monitored.
2, 3, 4, 5	40 CFR 60 Subpart KKKK	EU IDs 2, 3, 4, and 5 were not constructed, modified, or reconstructed after February 18, 2005.
2, 3, 4, 5	40 CFR 63 Subpart YYYY	Anna Platform is not a major source of HAPs emissions.
14, 15, 17, 18	40 CFR 60 Subpart IIII	EU IDs 14, 15, 17, and 18 were not constructed, modified, or reconstructed after July 11, 2005.
16	40 CFR 60 Subpart IIII, 60.4204(b) & (c), 60.4205(b) through (e), 60.4207, 60.4209, 60.4211(c) & (d), 60.4213, 60.4214	EU ID 16 has a displacement less than 10 liters per cylinder, was manufactured after April 1, 2006 but before the 2007 model year, is not required to conduct performance tests, is a certified engine, is not a fire pump engine or an emergency engine and is not equipped with a particulate filter, and is located in an area of Alaska not accessible by the FAHS.

EU ID	Non-Applicable Requirements	Reason for Non-Applicability
7 through 13	40 CFR 60 Subpart JJJJ	EU IDs 7 through 13 were not constructed, modified, or reconstructed after June 12, 2006.
7 through 15, 17, 18	40 CFR 63 Subpart ZZZZ, 63.6600, 63.6601, 63.6602, 63.6610, 63.6611, 63.6625(d), 63.6645(b) through (f), operating limits under Table 2b per 63.6603(a)	Anna Platform is not a major source of HAPs emissions. EU IDs 7 through 15, 17, and 18 are not subject to any numerical emission standards.
7 through 13	40 CFR 63 Subpart ZZZZ, 63.6612, 63.6615, 63.6620, 63.6625(a) through (c) & (f), 63.6630, 63.6635, 63.6640(f), 63.6645(g) & (h), 63.6650(a) through (e), (g), & (h), 63.6655(a) through (c) & (f)	EU IDs 7 through 12 are not emergency engines. EU IDs 7 through 13 are subject only to maintenance practices and need not perform monitoring or performance tests, nor use CEMS or CPMS. Anna Platform does not use landfill/digester gas. Anna Platform does not supply power to another entity.
14, 15, 17, 18	40 CFR 63 Subpart ZZZZ, 63.6604, 63.6612, 63.6615, 63.6620, 63.6625(g), 63.6630, 63.6635, 63.6640(b) & (d), 63.6650(a) through (e), 63.6655(a) & (d), Table 2d, Item 3	Anna Platform is not accessible by the FAHS. Per 40 CFR 63.6603(b), EU IDs 14, 15, 17, and 18 are not subject to numerical CO emission limitations but must meet the management practices that are shown for stationary non-emergency CI RICE with a site rating of less than or equal to 300 hp in Table 2d.
14, 15, 17, 18	40 CFR 63 Subpart ZZZZ, 63.6625(a) through (d) & (f), 63.6640(f), 63.6650(g) & (h), 63.6655(b), (c), & (f)	EU IDs 14, 15, 17, and 18 are not emergency engines, and are subject only to maintenance practices and need not perform monitoring or performance tests, nor use CEMS or CPMS. Anna Platform does not use landfill/digester gas.

Section 11. Visible Emissions Forms

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. 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
			Min				Comments
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	Cinometer Reading	6				
Distance From Observer	Direction From Observer		7				
Start	End	Start	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	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				
Additional Information:			30				
			Range of Opacity:		Maximum		
			Minimum				
I have received a copy of these opacity observations			Print Observer's Name				
Print Name:			Observer's Signature				Date
Signature:							Observer's Affiliation:
Title			Certifying Organization:				Date
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		Comments		
	Start	End	Sum	Average			

Section 12. SO₂ Material Balance Calculation

If a fuel shipment contains more than 0.75 percent sulfur by weight, calculate the three-hour exhaust concentration of SO₂ using the following equations:

A. $= 31,200 \times (\text{wt}\%S_{\text{fuel}}) = 31,200 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

B. $= 0.148 \times (\text{wt}\%S_{\text{fuel}}) = 0.148 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

C. $= 0.396 \times (\text{wt}\%C_{\text{fuel}}) = 0.396 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

D. $= 0.933 \times (\text{wt}\%H_{\text{fuel}}) = 0.933 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

E. $= B + C + D = \underline{\hspace{2cm}} + \underline{\hspace{2cm}} + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

F. $= 20.9 - (\text{vol}\%_{\text{dry}}O_{2, \text{exhaust}}) = 20.9 - \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

G. $= (\text{vol}\%_{\text{dry}}O_{2, \text{exhaust}}) \div F = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

H. $= 1 + G = 1 + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

I. $= E \times H = \underline{\hspace{2cm}} \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$

SO₂ concentration $= A \div I = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$ ppm

The **wt%S_{fuel}**, **wt%C_{fuel}**, and **wt%H_{fuel}** are equal to the weight percents of sulfur, carbon, and hydrogen, respectively, in the fuel. These percentages should total 100%.

The fuel weight percent of sulfur (**wt%S_{fuel}**) is obtained pursuant to Condition 12.1.a(ii) or Condition 12.1.b. The fuel weight percents of carbon and hydrogen are obtained from the fuel refiner.

The volume percent of oxygen in the exhaust (**vol%_{dry}O_{2, exhaust}**) is obtained from oxygen meters, manufacturer’s data, or from the most recent analysis under 40 CFR 60, Appendix A-2, Method 3, adopted by reference in 18 AAC 50.040(a), at the same emissions unit load used in the calculation.

Enter all of the data in percentages without dividing the percentages by 100. For example, if **wt%S_{fuel}** = 1.0%, then enter 1.0 into the equations not 0.01 and if **vol%_{dry}O_{2, exhaust}** = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.346(c)]

Section 13. Notification Form³⁰

Anna Platform

Stationary Source Name

Hilcorp Alaska, LLC

Company Name

AQ0062TVP05

Air Quality Permit Number.

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 COBC³¹, CO³², or Settlement Agreement - Complete Section 2 and Certify

³⁰ Revised as of July 22, 2020.

³¹ Compliance Order By Consent

³² 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 /Limit Exceeded /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 76.)*

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)]