

**Alaska Department of Environmental Conservation  
Air Permits Program**

**Minor General Permit 1 (MG1)  
Permit Change Table Support Document**

**Final – July 1, 2023**

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This Permit Change Table Support document accompanies the issuance of the Alaska Department of Environmental Conservation’s (Department’s) revision to the Minor General Permit 1 (MG1) effective July 1, 2023 for portable oil and gas operations (POGOs) classified under 18 AAC 50.502(c)(2)(A). The Department is issuing the MG1 under the provisions of 18 AAC 50.560 and AS 46.14.280(a).

The Department revised the MG1 from the previous revision that took place on December 15, 2005, in order to address changes 18 AAC 50, make technical and grammatical corrections, and to include a new Standard Permit Conditions (SPC). The changes involve making corrections or updating SPCs that have already been through the public comment process. Therefore, the department did not public notice the MG1 for the July 1, 2023, issuance. Table 1 includes a comparison of changes previously made with the issuance of the MG1 issued December 15, 2005, to the MG1 issued October 11, 2004, and Table 2 includes a comparison of the conditions from the MG1 issued July 1, 2023, to the MG1 issued December 15, 2005.

**Table 1 - Condition Changes from MG1 Issued 10/11/2004 to MG1 Issued 12/15/2005<sup>1</sup>**

<b>MG1 Permit (10/11/2004) Condition No.</b>	<b>Description</b>	<b>MG1 Permit (12/15/2005) Condition No.</b>	<b>Description of Change</b>
New Forms and Notification	New Forms and Notification	New Forms and Notification	Added new forms for Notification of Intent to Operate (initial application) as well as three amendments to the initial application form for additional reporting. Included a requirement for submitting the Amendment 1 form to identify the sole drill rig that will be operating under the MG1 if it was not already identified in the initial application. Included a requirement to submit new Amendment 2 form if the Permittee is operating south of 69 degree, 30 minutes north and plans to drill more wells than was previously identified in their initial application.
Definitions	Definitions	Definitions	Updated the definition of “portable oil and gas operation” and included the definition of “well servicing activities.”
Applicability Criteria	Applicability Criteria	Applicability Criteria	Removed the applicability criteria (1) “is contains fuel-burning equipment.” Added new applicability criteria (8) “will not operate a single pad or platform, or at pads within a quarter of a mile of each other, for more than 24 consecutive months” and (9) “ does not contain an internal combustion engine that will remain at the same location, as defined in 40 C.F.R. 89.2 for 12 consecutive months or more.”
4	Fee Requirements	4	Modified the condition to clarify which fees from 18 AAC 50.400 through 50.420 are applicable to the MG1 Permittees. This includes in the first year a permit administration fee of \$300 under 18 AAC 50.400(g), as well as a \$530 compliance review fee under 18 AAC 50.400(h) and an emission fee as specified under 18 AAC 50.410(e)(2) for both initial and subsequent years. Also included a requirement to submit new Amendment 3 form to terminate the permit early to avoid fees in subsequent years of operation.

Note

1. Table 1 only contains conditions that were added or modified.

**Table 2 - Condition Changes from MG1 Issued 12/15/2005 to MG1 Issued 7/1/2023<sup>1</sup>**

MG1 Permit (12/15/2005) Condition No.	Description	MG1 Permit (7/1/2023) Condition No.	Description of Change
Applicability Criteria	Applicability Criteria	Applicability Criteria	<p>Removed the applicability criteria (7) “does not operate within the boundary of an area identified in the <i>Summary Prepared by the Department of Environmental Conservation of Coastal Area Boundaries Approved by the Coastal Policy Council (CPC) for Coastal Resource Districts Excluded from the Portable Oil and Gas Operation Permit by Rule (18 AAC 50.390)</i>, adopted by reference in 18 AAC 50.035(a)” because these regulations have since been repealed. Also updated applicability criteria (8) (previously applicability criteria (9)) for nonroad engines to the new federal reference and to clarify that it only applies to a certain type of nonroad engine. The new applicability criteria and accompanying footnote reads as follows, “(8) does not contain an internal combustion engine that meets the definition of nonroad engine in 40 C.F.R. 1068.30-Nonroad Engine-(1)(iii)<sup>1</sup>, if it remains or will remain at a location for more than 12 consecutive months.</p> <p><sup>1</sup> Definition for <i>Nonroad Engine</i> in 40 C.F.R. 1068.30-Nonroad Engine-(1)(iii) and the definition for <i>location</i> in 40 C.F.R. 1068.30(2)(iii) can both be found in <a href="#">40 C.F.R. 1068.30</a>.”</p>
4	Fee Requirements	4	<p>Modified the condition to update the reference citations from 18 AAC 50.400 and 50.410 as amended through September 7, 2022 for the fees that are applicable to the MG1 Permittees, as well as, removed the exact dollar amounts so a future revision will not be required in the event of a new fee study that changes these fees. This includes in the first year a general permit application fee as determined under 18 AAC 50.400(c)(1) and an emission fee as specified under 18 AAC 50.410(g)(3), as well as, a compliance review fee under 18 AAC 50.400(d)(3)(A)(ii) &amp; (h) when billed by the Department, and in subsequent years an emission fee as determined under 18 AAC 50.410(g)(2). Also included new footnotes 2 and 3 with links to the Department’s general permits webpage where current fees, applications, and amendments can be found.</p>
No Equivalent	Triennial Emission Inventory Reporting	6	<p>Added Standard Permit Condition (SPC) XV – Emission Inventory Reporting condition, with modifications to remove annual reporting requirements only applicable for large Title V facilities. Additionally, the thresholds for triennial reporting were lowered from the SPC in order to capture all facilities subject to minor permitting to better meet the state’s reporting requirements to EPA, and under the authority of 18 AAC 50.275.</p>

Note

1. Table 1 only contains conditions that were added or modified.