ConocoPhillips
Alaska

Laura K. Perry
Coordinator - Air Quality

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March 29, 2019

ADEC, Air Permits Program
610 University Ave.
Fairbanks, AK 99709-3643
ATTN: Compliance Technician

Subject: 2018 Compliance Certifications for Kuparuk CPF-1, CPF-2, CPF-3, Seawater Treatment Plant, and Transportable Drill Rigs; Alpine CPF and Non-TCA

Please find enclosed one original and two copies of each of the 2018 annual compliance certifications for the following permits:

- Kuparuk CPF-1 (Permit No. AQ267TVP01)
- Kuparuk CPF-2 (Permit No. AQ273TVP01)
- Kuparuk CPF-3 (Permit No. AQ171TVP01)

One original and one copy of each of the 2018 annual compliance certifications for the following permits:

- Kuparuk Seawater Treatment Plant (Permit No. AQ172TVP02)
- Kuparuk Transportable Drill Rigs (Permit No. AQ0909TVP01)

And one original of the 2018 annual compliance certification for the following permits:

- Alpine CPF (Permit No. AQ 489TVP02)
- Alpine Non-TCA Doyon 19 Drill Rig (Permit No. AQ 1412TVP01)

During the certification period ConocoPhillips Alaska Inc. (CPAI) operated under the Kuparuk Transportable Drill Rigs Permit No. AQ0909TVP01 from January 1 through September 30, 2018. Effective October 1, 2018, CPAI withdrew the application to renew Permit No. AQ0909TVP01. This is the last annual compliance certification for AQ0909TVP01.

CPAI did not operate the Doyon 19 Drill Rig at Alpine under AQ1412TVP01 during the certification period.

Please don't hesitate to contact me at (907) 265-6937 if you have any questions.

Sincerely,

Laura K. Perry
Coordinator- Air Quality

Enclosures
cc: EPA Region 10, Office of Air Quality

Attachment No. 1
Kuparuk CPF 1

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through December 31, 2018

Air Quality Operating Permit No. AQ0267TVP01 (Revision 2)

ConocoPhillips Alaska, Inc.

Kuparuk Central Production Facility #1

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

ED_004016I_00012166-00003

Title V Compliance Certification Report - Central Production Facility #1 - ConocoPhillips Alaska, Inc.
Permit No. AQ0267TVP01 (Revision 2) - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
4	1, 2	Assessable Emissions	All	NA	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to ADEC by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		
5	~~3a & 3b~~	Visible Emissions	1-50, 59, 60	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed ~~20% for more than 3 minutes in any 1 hour or more than~~ 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1 - 3, 10, 11, 14, 16, 17 & 37 - 40, 42 - 49:*** *burned only gas.* ***(Gas-fired EU IDs 41 and 50 are no longer in service)*** ***Dual fuel-fired EU IDs 4 - 9, 12, 13, 15:*** *burned only gas* ***(Dual fuel-fired EU ID 18 and liquid fuel-fired EU IDs 19, 20, & 21 are no longer in service)*** ***Liquid fuel-fired EU IDs 22 - 28:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 29, 31, 32 - 34:*** *reasonable inquiry* ***Flare EU ID 30:*** *On 3/1/2018, EU ID 30 exceeded the SIP visible emissions standard; an EE report was submitted on 3/5/2018.* ***Incinerator EU ID 35:*** *Method 9 observation and reasonable inquiry* ***(Incinerator EU ID 36 is no longer in service)*** ***DS1E/1J drill rig heaters and boilers (EU ID 59):*** *monitoring not required; reasonable inquiry* ***DS1E/1J rig camp engines (EU ID 60):*** *none in operation during the certification period.*		X	
5	3c	Visible Emissions	1-3, 8-13, 36	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed 10% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1 - 3, 10, 11:*** *burned only gas* ***Dual fuel-fired EU IDs 8, 9, 12, 13:*** *burned only gas* ***(Incinerator EU ID 36 is no longer in service)***	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	3.1 & 4.1	Visible Emissions & Particulate Matter	1-3, 10, 11, 14, 16, 17, 37-50	Fuel-Fired Equipment	Monitoring for these emission units shall consist of annual certification that each of these emission units fired only gas.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs** 1 - 3, 10, 11, 14, 16, 17, 37 - 40, 42 - 49:* *All burned only gas during the certification period.* ***(Gas-fired EU IDs 41 and 50 are no longer in service)***	X		
5	3.2	Visible Emissions	19-28	Diesel-Fired Equipment	If these emission units did not operate more than the thresholds in Condition 3.3, monitoring shall consist of an annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***(EU IDs 19, 20, & 21 are no longer in service)*** ***EU IDs 22 - 28** operated 400 hours or less during the certification period.* *Compliance with visible emissions standard assessed based on reasonable inquiry.*	X		
5	3.3	Visible Emissions	19-20	Diesel-Fired Equipment	If these emission units operated more than 140 hours in one calendar year, monitor, record, and report in accordance with Conditions 98 & 99.	*Recordkeeping/ Operating Reports* ***EU IDs 19 & 20 are no longer in service*** *No monitoring required*			X
5	3.3	Visible Emissions	21-28	Diesel-Fired Equipment	If these emission units operated more than 400 hours in one calendar year, monitor, record, and report in accordance with Conditions 98 & 99.	*Recordkeeping/ Operating Reports* ***(EU ID 21 is no longer in service)*** ***EU IDs 22 - 28** operated 400 hours or less during the certification period.* *No monitoring required*			X
5	3.4	Visible Emissions	4-9, 12, 13, 15, 18	Dual Fuel-Fired Equipment	If these emission units operated only on gas, monitoring shall consist of an annual certification that the emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, 13, and 15** operated only on gas or did not operate during the certification period.* ***(Dual fuel-fired EU ID 18 is no longer in service)***	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	3.4	Visible Emissions	4-9, 12, 13, 15, 18	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Conditions 98 & 99 while firing liquid fuel.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, 13, and 15*** *operated on liquid fuel less than 400 hours during the certification period.* ***(Dual fuel-fired EU ID 18 is no longer in service)*** *No monitoring required.*			X
5	3.4	Visible Emissions	4-9, 12, 13, 15, 18	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, 13, and 15*** *operated on liquid fuel less than 400 hours during the certification period.* ***(Dual fuel-fired EU ID 18 is no longer in service)*** *Compliance with visible emissions standard assessed based on reasonable inquiry for these units.*			X
5	3.5	Visible Emissions	29-34	Flares	Monitor, record, and report in accordance with Condition 102.	*Recordkeeping/ Operating Reports*	X		
5	3.6	Visible Emissions	35-36	Incinerators	Perform a Method 9 visible emission observation once per calendar year in accordance with Conditions 98 and 99.	*Method 9 Observation/ Recordkeeping/ Operating Reports* ***EU ID 35:*** *Method 9 completed as requried* ***(EU ID 36 is no longer in service)***	X		
5	3.7	Visible Emissions	59	Drill Rig Heaters and Boilers	For each drill rig heater and boiler, monitoring shall consist of an annual certification of compliance with the opacity standard.	*Reasonable Inquiry*	X		
5	3.8	Visible Emissions	60	Rig Camp Engines at DS1E/1J	For each rig camp engine, not meeting the definition of a nonroad engine and that combusts more than 13,500 gallons of fuel per consecutive 12-month period, monitor, record, and report for that unit in accordance with Conditions 98 and 99.	*Monitoring, recordkeeping, and reporting not triggered.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	4a	Particulate Matter	1-34, 37-50, 59, 60	Fuel-Fired Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust gas corrected to standard conditions and averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1 - 3, 10, 11, 14, 16, 17 & 37 - 40, 42 - 49:*** *burned only gas.* ***(Gas-fired EU IDs 41 and 50 are no longer in service)*** ***Dual fuel-fired EU IDs 4 - 9, 12, 13, 15:*** *burned only gas.* ***(Dual fuel-fired EU ID 18 and liquid fuel-fired EU IDs 19, 20, & 21 are no longer in service)*** ***Liquid fuel-fired EU IDs 22 - 28:*** *monitoring not required; reasonable inquiry.* ***Flare EU IDs 29 - 34:*** *reasonable inquiry.* ***DS1E/1J drill rig heaters and boilers (EU ID 59):*** *monitoring not required; reasonable inquiry.* ***DS1E/1J rig camp engines (EU ID 60):*** *none in operation during the certification period.*	X		
5	4b	Particulate Matter	35	Incinerator	PM emitted from this emission unit shall not exceed 0.15 grains/dscf of exhaust corrected to 12% CO_2, averaged over 3 hours.	*Monitoring not required. Reasonable inquiry.*	X		
5	4c	Particulate Matter	36	Incinerator	PM emitted from this emission unit shall not exceed 0.10 grains/dscf of exhaust corrected to 12% CO_2, averaged over 3 hours.	*Monitoring not required.* ***EU ID 36 is no longer in service***			X
5	4.2	Particulate Matter	19-28	Diesel-Fired Equipment	If these emission units did not operate more than the thresholds in Condition 4.3, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***(EU IDs 19, 20, & 21 are no longer in service)*** ***EU IDs 22 - 28*** *operated 400 hours or less during the certification period.* *Compliance with particulate matter standard assessed based on reasonable inquiry.*	X		
5	4.3	Particulate Matter	19-20	Diesel-Fired Equipment	If these emission units operated more than 140 hours in one calendar year, monitor, record, and report PM emissions in accordance with Condition 100.	*Recordkeeping/ Operating Reports* ***EU IDs 19 & 20 are no longer in service*** *No monitoring required*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	4.3	Particulate Matter	21-28	Diesel-Fired Equipment	If these emission units operated more than 400 hours in one calendar year, monitor, record, and report PM emissions in accordance with Condition 100.	*Recordkeeping/ Operating Reports* ***(EU ID 21 is no longer in service)*** ***EU IDs 22 - 28*** *operated 400 hours or less during trhe certification period.* *No monitoring required*			X
5	4.4	Particulate Matter	4-9, 12, 13	Dual Fuel-Fired Equipment	If these emission units operated only on gas, monitoring shall consist of an annual certification that the emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, and 13*** *operated only on gas or did not operate during the certification period.*	X		
5	4.4	Particulate Matter	4-9, 12, 13	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Condition 100 while firing liquid fuel.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, and 13*** *operated on liquid fuel less than 400 hours during the certification period.* *No monitoring required.*			X
5	4.4	Particulate Matter	4-9, 12, 13	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 5, 6, 7, 8, 9, 12, and 13*** *operated on liquid fuel less than 400 hours during the certification period.* *Compliance with particulate matter standard assessed based on reasonable inquiry for these units.*			X
5	4.5	Particulate Matter	15, 18	Dual Fuel-Fired Equipment	If these emission units operated only on gas, monitoring shall consist of an annual certification that the emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU ID 15*** *operated only on gas.* ***(Dual fuel-fired EU ID 18 is no longer in service)***	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	4.5	Particulate Matter	15, 18	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Condition 101 while firing liquid fuel.	*Recordkeeping/ Operating Reports* ***EU ID 15*** *did not operate on liquid fuel more than 400 hours during the certification period.* ***(Dual fuel-fired EU ID 18 is no longer in service)*** *No monitoring required*			X
5	4.5	Particulate Matter	15, 18	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU ID 15*** *operated less than 400 hours on liquid fuel during the certification period.* ***(Dual fuel-fired EU ID 18 is no longer in service)*** *Compliance with PM standard assessed based on reasonable inquiry.*			X
5	4.6	Particulate Matter	29-34	Flares	Certify these emission units were in compliance with the PM standard.	*Reasonable Inquiry*	X		
5	4.7	Particulate Matter	35-36	Incinerators	Monitor, record, and report in accordance with Condition 101.	*Recordkeeping/ Operating Reports* ***EU ID 35:*** *Monitoring not required based on favorable Method 9 observation results. Documentation was provided in Operating Report.* ***(EU ID 36 is no longer in service)***			X
5	4.8	Particulate Matter	59	Drill Rig Heaters and Boilers	For each drill rig heater and boiler, monitoring shall consist of an annual certification of compliance with the particulate matter standard.	*Reasonable Inquiry*	X		

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							Continuous	Intermittent	Not Triggered
5	4.9	Particulate Matter	60	Rig Camp Engines at DS1E/1J	For each rig camp engine, not meeting the definition of a nonroad engine and that combusts more than 13,500 gallons of fuel per consecutive 12-month period, monitor, record, and report for that unit in accordance with Condition 100.	*Monitoring, recordkeeping, and reporting not triggered.*			X
5	5	Sulfur Compound Emissions	1-34, 37-50, 59, 60	Fuel-Fired Equipment	Sulfur compound emissions from these emission units, expressed as SO_2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO_2 material balance*	X		
5	5.1	Sulfur Compound Emissions - for Diesel Fuel	4-9, 12, 13, 15, 18, 19-28, 59, 60	Diesel-Fired Equipment	Obtain monthly fuel sulfur analysis results from Topping Plant.	*Recordkeeping*	X		
5	5.1a	Sulfur Compound Emissions - for Diesel Fuel	4-9, 12, 13, 15, 18, 19-28, 59, 60	Diesel-Fired Equipment	Include a list of sulfur content measured for each month in Operating Report.	*Operating Reports*	X		
5	5.1b	Sulfur Compound Emissions - for Diesel Fuel	4-9, 12, 13, 15, 18, 19-28, 59, 60	Liquid Fuel Burning Equipment	Calculate SO_2 emissions in PPM using either the SO_2 material balance calculation in Section 17 or Method 19 of 40 CFR 60 Appendix A-7, adopted by reference in 18 AAC 50.040(a) if the fuel sulfur content exceeds 0.75% by weight.	*Recordkeeping and SO_2 material balance*			X
5	5.1c	Sulfur Compound Emissions - for Diesel Fuel	4-9, 12, 13, 15, 18, 19-28, 59, 60	Diesel-Fired Equipment	Submit an excess emissions report if SO_2 emissions exceed 500 ppm.	*Recordkeeping and SO_2 material balance* *Excess emissions reporting not required during the certification period.*			X
5	5.1d	Sulfur Compound Emissions - for Diesel Fuel	4-9, 12, 13, 15, 18, 19-28, 59, 60	Liquid Fuel Burning Equipment	Report the calculated SO_2 emissions in PPM in the Operating Report for fuel with a sulfur content greater than 0.75% by weight.	*Recordkeeping and SO_2 material balance*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	5.2a	Sulfur Compound Emissions - for Fuel Gas	1-18, 29-34, 37-50	Gas-Fired Equipment	Determine sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or readings from KUTP CMS, or an alternative analytical method approved by EPA.	*ASTM Method D 4810 and KUTP CMS. Documentation provided in Operating Reports.*	X		
5	5.2b & 5.2d	Sulfur Compound Emissions - for Fuel Gas	1-18, 29-34, 37-50	Gas-Fired Equipment	Records of analyses conducted shall be kept and copies shall be included with Operating Report.	*Reports of monthly H_2S in Operating Reports.*	X		
5	5.2c	Sulfur Compound Emissions	1-18, 29-34, 37-50	Gas-Fired Equipment	Submit an excess emissions report if sulfur compound emissions, expressed as SO_2, from any emission unit exceeds 500 ppm averaged over 3 hours.	*Recordkeeping and SO_2 material balance Excess emissions reporting not required during the certification period.*			X
5	6	Turbine BACT Emission Limits	1-3, 8-13	Turbines	Actual emissions from turbines shall be limited as indicated in Table 2 of Air Quality Operating Permit No. AQ0267TVP01.	*Source test data, installation of BACT, recordkeeping, and good operational procedures*	X		
5	6.1	Turbine BACT Emission Limits	1-3, 8-13	Turbines	Use emission factors in Section 18 of Operating Permit No. AQ0267TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, PM, and VOC.	*Recordkeeping*	X		
5	6.2	Turbine BACT Emission Limits	1-3, 8-13	Turbines	Report monthly and consecutive 12-month period summation of NOx, SO_2, CO, PM, and VOC emissions, for each month of reporting period, with Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	6.3	Turbine BACT Emission Limits	1-3, 8-13	Turbines	Submit an excess emissions report emissions if any air contaminant exceeds the BACT limit for that contaminant in Condition 6.	*Recordkeeping/ Operating Reports Excess emissions reporting not required during the certification period.*			X
5	6.4	Turbine BACT Emission Limits	1-3, 8-13	Turbines	Monitor, record, and report in accordance with Conditions 31.2 through 31.6 to demonstrate compliance with short-term BACT NO_x emission limits in Table 2 of Air Quality Operating Permit No. AQ0267TVP01.	*Frame 3K (EU ID 1) turbine tested April 12 & 13, 2014. Other turbines based on substitution of source test data.*	X		
5	7	Born and Drill Site Heater BACT Emission Limits	16, 37-41, 43-45, 48-50	Heaters	Actual emissions from these heaters shall be limited as indicated in Table 3 of Air Quality Operating Permit No. AQ0267TVP01.	*Source test data, routine maintenance, recordkeeping, and good operational procedures*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	7.1	Born and Drill Site Heater BACT Emission Limits	16, 37-41, 43-45, 48-50	Heaters	Use emission factors in Section 18 of Operating Permit No. AQ0267TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, and PM.	*Recordkeeping*	X		
5	7.2	Born and Drill Site Heater BACT Emission Limits	16, 37-41, 43-45, 48-50	Heaters	Report monthly and consecutive 12-month period summation of NOx, SO_2, CO, and PM emissions, for each month of reporting period, with Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	7.3	Born and Drill Site Heater BACT Emission Limits	16, 37-41, 43-45, 48-50	Heaters	Submit an excess emissions report if emissions of any air contaminant exceeds any BACT limit for that contaminant in Condition 7.	*Recordkeeping/ Operating Reports* *Excess emissions reporting not required during the certification period.*			X
5	8	Incinerator BACT Emission Limits	36	Incinerator	Actual emissions from this emission unit shall be limited as indicated in Table 4 of Air Quality Operating Permit No. AQ0267TVP01.	*Method 9, recordkeeping, and good operational procedures* ***EU ID 36 is no longer in service***	X		
5	8.1	Incinerator BACT Emission Limits	36	Incinerator	Use emission factors in Section 18 of Operating Permit No. AQ0267TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, PM and VOC.	*Recordkeeping* ***EU ID 36 is no longer in service***	X		
5	8.2	Incinerator BACT Emission Limits	36	Incinerator	Report monthly and consecutive 12-month period summation of NOx, SO_2, CO, PM and VOC emissions, for each month of reporting period, with Operating Report.	*Recordkeeping/ Operating Reports* ***EU ID 36 is no longer in service***	X		
5	8.3	Incinerator BACT Emission Limits	36	Incinerator	Submit an excess emissions report emissions of any air contaminant exceeds the BACT limit for that contaminant in Condition 8.	*Recordkeeping/ Operating Reports* *Excess emissions reporting not required during the certification period.* ***EU ID 36 is no longer in service***			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	9	BACT limits	14	GE Frame 6 (PG6561 B) Gas Turbine Electric Generator	Actual short-term NOx emissions from this emission unit shall be limited as indicated in Table 5 of Air Quality Operating Permit No. AQ0267TVP01.	*Source test data and good operational procedures*	X		
5	9	BACT limits	17	Kvaerner Process Systems Fuel Gas Heater	Actual short-term NOx emissions from this emission unit shall be limited to 0.10 lb/MMBtu.	*Good air pollution control and operational practices.* *No monitoring required.*	X		
5	9	BACT limits	14, 17	NA	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions, 24-hour average.	*Recordkeeping/ Operating Reports*	X		
5	9.1	BACT limits	14	GE Frame 6 (PG6561 B) Gas Turbine Electric Generator	Operate emission unit with CZ liner lean-head combustion technology.	*Recordkeeping*	X		
5	9.1	BACT limits	17	Kvaerner Process Systems Fuel Gas Heater	Operate emission unit with low NOx burners.	*Reasonable Inquiry* *Emissions Check*	X		
5	9.2	BACT limits	14	GE Frame 6 (PG6561 B) Gas Turbine Electric Generator	Conduct an emission source test following 40 CFR 60 Appendix A-7 Method 20 or following another protocol approved by ADEC to demonstrate compliance with the short-term BACT NOx emission limit in Table 5 of Permit No. AQ0267TVP01 no less than once every two years. Record and report in accordance with Conditions 31.5 and 31.6.	*Source tests conducted every two years.* *Most recent test conducted August 8-9, 2018.* *Next test planned for 2020.*	X		
5	9.3	BACT limits	14, 17	NA	Burn fuel gas with a H_2S content less than 200 ppmv (24-hr average). Monitor, record, and report in accordance with Condition 5.2.	*Operating Reports* *ASTM Method D 4810 and KUTP CMS*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	10	Fuel Consumption Monitoring	1-50, 58-63	Fuel-Fired Equipment	Maintain and operate fuel gas meters or provide other means of estimating fuel consumption to determine the total volume of fuel gas consumed by emission units 1-14 and 15-18. Fuel consumption may be estimated for emission units 19-50 and 58-63.	*Recordkeeping*	X		
5	10.1, 15.1, 16.1, 18.1	Fuel Consumption Monitoring	1-50, 58-63	Fuel-Fired Equipment	Monitor and record the monthly fuel consumption for - * turbines (emission units 1-14 combined), * heaters and drill site heaters (emission units 15-18, 37 - 41, 43 - 45, and 48 - 50 combined), * diesel-fired equipment (emission units 19 - 28 combined), * flares (emission units 29 - 33), * portable flare (emission unit 34), * incinerators (emission units 35 and 36, combined), * drill site production heaters (each of 42, 46, and 47), * drill rig engines (emission unit 58), * drill rig heaters and boilers (emission unit 59), * rig camp engines (emission unit 60), * well service heaters (emission unit 61), * well service engines (emission unit 62), and * well fracturing unit engines (emission unit 63).	*Recordkeeping*	X		
5	10.2, 15.1, 16.1, 18.1	Fuel Consumption Monitoring	34, 58-63	Portable Emission Units at DS1E/1J	Monitor and record the 12 consecutive month total fuel consumption for each emission unit group described by emission units 34, and 58 through 63.	*Recordkeeping*	X		
5	10.3, 15.1, 17.1, 18.1	Fuel Consumption Monitoring	34, 58, 61-63	Portable Emission Units at DS1E/1J	Monitor and record the total daily fuel use for each emission unit group described by emission units 34, 58, and 61 through 63.	*Recordkeeping*	X		
5	10.4, 15.1, 16.1, 18.1	Fuel Consumption Monitoring	1-50, 58-63	Fuel-Fired Equipment	Report monthly fuel consumption for each emission unit group (turbines, heaters, engines, flares, incinerators, drill site heaters, drill rig engines, drill rig heaters and boilers, rig camp engines, well service heaters, well service engines, and well fracturing unit engines), and the stationary source total fuel consumption for each month covered by the reporting period using the Operating Report.	*Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
5	10.5, 15.1, 16.1, 18.1	Fuel Consumption Monitoring	34, 58-63	Portable Emission Units at DS1E/1J	Report 12 consecutive month total fuel consumption for each emission unit group described by emission units 34, and 58 through 63 for each month covered by the reporting period using the Operating Report.	*Operating Reports* *Note: **EU ID 34** has never been used.*	X		
5	10.6, 15.1, 17.1, 18.1	Fuel Consumption Monitoring	34, 58, 61-63	Portable Emission Units at DS1E/1J	Report maximum total daily fuel consumption for each emission unit group described by emission units 34, 58, 61 and 62 combined, and 63 for each month covered by the reporting period using the Operating Report.	*Operating Reports* *Note: **EU ID 34** has never been used.*	X		
5	11.1 & 11.3	Hours of Operation Monitoring	1-18, 35-50	Fuel-Fired Equipment	Monitor and record the monthly operating time for each of these emission units, and report in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	11.2 & 11.3	Hours of Operation Monitoring	4-9, 12, 13, 15, 18	Dual Fired Equipment	Monitor and record the monthly operating time separately for each of these emission units on liquid fuel and fuel gas, and report in the Operating Report. Record the calendar year total liquid fuel operating time.	*Recordkeeping/ Operating Reports*	X		
5	12a	Fuel Gas Sulfur Content Limit	1-13, 15, 18, 29-41, 43-45, 48-50	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions, annual average.	*Recordkeeping/ Operating Reports*	X		
5	12b	Fuel Gas Sulfur Content Limit	14, 17	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions, 24-hour average.	*Recordkeeping/ Operating Reports*	X		
5	12c	Fuel Gas Sulfur Content Limit	16, 30	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 162 ppmv at standard conditions, 3-hour average.	*Recordkeeping/ Operating Reports*	X		
5	12d	Fuel Gas Sulfur Content Limit	41, 42, 46, 47	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 275 ppmv at standard conditions, at any time.	*Recordkeeping/ Operating Reports*	X		
5	12.1	Fuel Gas Sulfur Content Limit	1-18, 29-50	Gas-Fired Equipment	Monitor and record according to Conditions 32.1, 32.3, and 33.1.	*Operating Reports* *ASTM Method D 4810 and KUTP CMS*	X		

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5	12.2	Fuel Gas Sulfur Content Limit	1-18, 29-50	Gas-Fired Equipment	Report the monthly and consecutive 12-month average fuel gas H_2S concentration, for each month of the reporting period, with each Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	12.3	Fuel Gas Sulfur Content Limit	1-18, 29-50	Gas-Fired Equipment	Submit an excess emissions report if the fuel gas H_2S concentration exceeds any limit in Condition 12.	*Recordkeeping/ Operating Reports* *Excess emissions reporting not required during the certification period.*			X
5	13a, 13.1	Liquid Fuel Sulfur Content Limit	18	ICE Air Heater	Do not use liquid fuel with a sulfur concentration that exceeds 0.5%. Monitor, record, and report according to Conditions 32.1b, 32.3, and 32.4.	***EU ID 18 is no longer in service***			X
5	13b, 13.1	Liquid Fuel Sulfur Content Limit	58-63	Portable Emission Units at DS1E/1J	Do not use liquid fuel with a sulfur concentration that exceeds 0.150%. Monitor, record, and report according to Conditions 32.1b, 32.3, and 32.4.	*Operating Reports* *ASTM Method D 7039 (ULSD),* *ASTM Method D 2622-10 (LEPD)*	X		
5	13.2	Liquid Fuel Sulfur Content Limit	18, 58-63	ICE Air Heater, Portable EUs at DS1E/1J	Submit an excess emissions report if the liquid fuel sulfur content exceeds any limit in Condition 13.	*Recordkeeping/ Operating Reports* *Excess emissions reporting not required during the certification period.*			X
5	14	Limits to Protect Ambient Air Quality	NA	NA	Document the date on which construction drilling commenced, is completed, and when post construction drilling commences and is completed for DS1E and DS1J.	*Recordkeeping* *DS1E construction drilling commenced March 30, 2004.* *DS1J construction drilling commenced August 14, 2005.* *End of construction drilling was March 30, 2006.* *Post-construction drilling began on March 30, 2006.* *End date for post-construction drilling at 1E and 1J is "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*	X		
5	15a	Limits to Protect Ambient Air Quality	58	Drill Rig Engines at DS1E/1J	Limit the combined fuel use of all drill rig engines to no greater than 3,159,000 gallons per 12 consecutive month period **prior to March 30, 2006**.	*This limit is no longer applicable.*			X
5	15b	Limits to Protect Ambient Air Quality	58	Drill Rig Engines at DS1E/1J	Limit the combined fuel use of all drill rig engines to no greater than 316,200 gallons per 12 consecutive month period **effective March 30, 2006**.	*Recordkeeping/ Operating Reports*	X		

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5	15c	Limits to Protect Ambient Air Quality	58	Drill Rig Engines at DS1E/1J	Limit the combined fuel use of all drill rig engines to no greater than 5,170 gallons per day **beginning March 30, 2006**.	*Recordkeeping/ Operating Reports*	X		
5	16a	Limits to Protect Ambient Air Quality	59	Drill Rig Heaters and Boilers at DS1E/1J	Limit the combined fuel use of all drill rig heaters and boilers at DS1E/1J to no greater than 1,476,000 gallons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
5	16b	Limits to Protect Ambient Air Quality	60	Rig Camp Engines at DS1E/1J	Limit the combined fuel use of all rig camp engines at DS1E/1J to no greater than 54,400 gallons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
5	16c	Limits to Protect Ambient Air Quality	61	Well Service Heaters at DS1E/1J	Limit the combined fuel use of all well service heaters at DS1E/1J to no greater than 200,000 gallons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
5	16d	Limits to Protect Ambient Air Quality	62	Well Service Engines at DS1E/1J	Limit the combined fuel use of all well service engines at DS1E/1J to no greater than 177,800 gallons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
5	16e	Limits to Protect Ambient Air Quality	63	Well Fracturing Unit Engines at DS1E/1J	Limit the combined fuel use of all well fracturing unit engines at DS1E/1J to no greater than 50,000 gallons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
5	17a	Limits to Protect Ambient Air Quality	61, 62	Well Service Equipment at DS1E/1J	Limit the combined daily fuel use of the well service heaters and engines at DS1E/1J to no greater than 2,700 gallons.	*Recordkeeping/ Operating Reports*	X		
5	17b	Limits to Protect Ambient Air Quality	63	Well Fracturing Unit Engines at DS1E/1J	Limit the combined daily fuel use of the well fracturing unit engines at DS1E/1J to no greater than 20,100 gallons.	*Recordkeeping/ Operating Reports*	X		

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5	18a	Limits to Protect Ambient Air Quality	34	Portable Flare at DS1E/1J	Limit the gas burned by the portable flare at DS1E/1J to no more than 16.2 MMscf per 12 consecutive month period.	*EU ID 34 has never been used*			X
5	18b	Limits to Protect Ambient Air Quality	34	Portable Flare at DS1E/1J	Limit the gas burned by the portable flare at DS1E/1J to no more than 150,000 scf per day.	*EU ID 34 has never been used*			X
5	19	NESHAP Subpart E	35 & 36	Incinerators	Mercury emissions from sludge incineration plants (incinerators) must not exceed 3.2 kg per 24-hr period. Annually certify compliance in accordance with Condition 89.	*Monitoring not required per waiver letter from EPA on October 16, 1997.* *Compliance assessed based on reasonable inquiry.* ***EU ID 36 is no longer in service***	X		
5	20	NESHAP Subpart A	35 & 36	Incinerators	Do not operate the incinerators in violation of Condition 19, except under an exemption granted by the President.	*Recordkeeping* ***EU ID 36 is no longer in service***	X		
5	21	NSPS Subpart A - Good Air Pollution Control Practice	1-14, 16, 30, 31, 35, 36, 42, 46, 47, 51-55, 57	NSPS & NESHAP emission units	These emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.	*Recordkeeping*	X		
5	22	NSPS Subpart A - Concealment of Emissions	1-14, 16, 30, 31, 35, 36, 42, 46, 47, 51-55, 57	NSPS & NESHAP emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 19, 28, and 29 through 36.	*Recordkeeping*	X		
5	23	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-14, 16, 30, 31, 42 46, 47, 51-55, 57	NSPS emission units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units; any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative.	*Recordkeeping*	X		

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5	24 (24.1-24.4) 25 (25.1, 25.2)	NSPS Subpart A - EEMSP Report	1-14	Fuel Gas Fired Subpart GG-affected Turbines	Submit an Excess Emissions and Monitoring Systems Performance Report and/or a summary report form to EPA annually for turbine fuel gas H_2S data associated with these emission units within 30 days following the end of each reporting period. A copy of the report must also be sent to ADEC.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted in a timely manner.*	X		
5	24 (24.1-24.4) 25 (25.1, 25.2)	NSPS Subpart A - EEMSP Report	4-9, 12, 13	Liquid Fuel Fired Subpart GG-affected Turbines	Submit an Excess Emissions and Monitoring Systems Performance Report and/or a summary report form to EPA annually for turbine liquid fuel sulfur data associated with these emission units within 30 days following the end of each reporting period. A copy of the report must also be sent to ADEC.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted in a timely manner.*	X		
5	24 (24.1-24.4) 25 (25.1, 25.2)	NSPS Subpart A - EEMSP Report	16	Born Crude Heater (KUTP)	Submit an Excess Emissions and Monitoring Systems Performance Report and/or a summary report form to EPA semi-annually for the H_2S data monitored by the CEMS for this emission unit within 30 days following the end of each reporting period. A copy of the report must also be sent to ADEC.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted to EPA in a timely manner.* *A Permit Deviation Report was submitted on 2/11/2019 with the 4Q 2018 Operating Report (the Permit Deviation Report was amended on 2/12/2019 and again on 3/12/19) for failing to submit a copy of the Subpart J EEMSP Report and Summary Report Form to ADEC.*		X	
5	24 (24.1-24.4) 25 (25.1, 25.2)	NSPS Subpart A - EEMSP Report	30	Kaldair I-58-VS Flare	Submit an Excess Emissions and Monitoring Systems Performance Report and/or a summary report form to EPA semi-annually for the H_2S data monitored by the CEMS for this emission unit within 30 days following the end of each reporting period. A copy of the report must also be sent to ADEC.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted to EPA in a timely manner.* *A Permit Deviation Report was submitted on 2/11/2019 with the 4Q 2018 Operating Report (the Permit Deviation Report was amended on 2/12/2019 and again on 3/12/19) for failing to submit a copy of the Subpart J EEMSP Report and Summary Report Form to ADEC.*		X	

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5	26	NSPS Subpart A - EEMSP Report	12, 13	Dual-fuel Turbines Subject to the Subpart GG NOx Limit	Include in the Excess Emissions and Monitoring Systems Performance Report each period during which the emergency fuel exemption provided in §60.332(k) is in effect for these emission units. For each period, report the type, reasons, and duration of the firing of emergency fuel.	*Recordkeeping* *EEMSP reports and/or Summary Report Form*	X		
5	27	NSPS Subpart A - Credible Evidence	1-14, 16, 30, 31, 42, 46, 47, 57	NSPS emission units	Nothing in this permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.	*N/A - Advisory Condition*	X		
5	28	NSPS Subpart A - General Control Device Requirements	30, 31	Flares	Operate and maintain these emission units in accordance with applicable provisions of 40 CFR 60.18.	*Recordkeeping*	X		
5	29	NSPS Subpart Dc - Fuel Consumption	42, 46, 47	NSPS Subpart Dc Affected Heaters	Record and maintain records of the amount of fuel combusted during each day for these emission units, or monitor according to an EPA-approved custom fuel monitoring schedule.	*Recordkeeping*	X		
5	30	NSPS Subpart Ka - Requirements	51-55	Tanks	Do not store a petroleum liquid with a true vapor pressure greater than 1.0 psia in these emission units.	*Recordkeeping/ parameter data*	X		
5	31a	NSPS Subpart GG - NO_X Standard	1-3	Turbines	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 161 ppmvd.	*Source Test Results*	X		
5	31b	NSPS Subpart GG - NO_X Standard	10-13	Turbines	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 162 ppmvd. (Note: emission units 12 and 13 are exempt from this standard when firing on liquid fuel in accordance with 40 CFR 60.332 (k).)	*Source Test Results*	X		
5	31.1	NO_X MR&R - WAIVERS	1-3, 10-13	Turbines	Upon request, furnish ADEC with a written copy of any EPA granted waiver of the federal emission standards, recordkeeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X

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5	31.1	NO_X MR&R - WAIVERS	1-3, 10-13	Turbines	A copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule must be kept on file.	*Recordkeeping*	X		
5	31.2a	NO_X MR&R - PERIODIC TESTING	1-3, 8-13	Turbines	If these emission units operate 400 hours or more in any 12-month period during the life of this permit, then Condition 31.2a(i) or 31.2a(ii) must be satisfied.	*Source tests and substitution of source test data.*	X		
5	31.2a(i)	NO_X MR&R - PERIODIC TESTING	1-3, 8-13	Turbines	For existing turbines not represented by emission data described in Condition 31.2a(ii), a NOx and O2 source test must be conducted under 40 CFR 60, Appendix A-7, Method 20 by April 2006 A) for each turbine, or B) on one turbine to represent a group of turbines, if allowed to do so under Condition 31.3.	*Source tests and substitution of source test data.*	X		
5	31.2a(ii)	NO_X MR&R - PERIODIC TESTING	1-3, 8-13	Turbines	If Condition 31.2a(i) is not satisfied, then if a test following 40 CFR 60, Appendix A-7, Method 20 or following another protocol approved by ADEC was conducted on a turbine between April 2001 and April 2003 (within two years before the issuance date of this permit), and the test shows that emissions at a maximum load are less than 90% of the emission limit in Condition 6 and/or Condition 31, then the permittee may use the results to demonstrate compliance with the limits, but additional testing is required by April 2008.	*CPAI did not rely on this condition to demonstrate compliance.*			X
5	31.2b	NO_X MR&R - TESTING	1-3, 8-13	Turbines	If test results for one turbine are 90% or more of the emission limit at maximum load, a Method 20 test shall be conducted within one year of the test. At least one additional test is required until at least 2 consecutive tests show emissions less than 90% of limit at loads up to maximum.	*Source tests and substitution of source test data.*			X
5	31.3	NO_X MR&R- Substituting Test Data	1-3, 8-13	Turbines	CPAI may use a Method 20 test on only one of the turbines to satisfy the testing requirement if the test is representative of the group and the results are less than 90% of the limit.	*Source tests and substitution of source test data.*	X		
5	31.4	NO_X MR&R - Load	1-3, 8-13	Turbines	Tests shall be in accordance with 40 CFR 60.335(c)(3) or other approved method. Testing shall occur when the turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Source tests and substitution of source test data.*			X

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5	31.5a	NO_X MR&R - Recordkeeping	1-3, 8-13	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load and method for calculating load from the measurements. Within one month of demonstrating highest load under Condition 31.4c(i), submit to ADEC how load or load surrogates will be measured and a schedule for necessary equipment installation and monitoring.	*Source tests and substitution of source test data.*			X
5	31.5b	NO_X MR&R - Recordkeeping	1-3, 8-13	Turbines	For turbines that have not been tested because they normally operate less than 400 hours, keep monthly records of the hours of operation. If a turbine which normally operates less than 400 hours, exceeds that total during any 12 month period, test according to Condition 31.2, or if not possible, then test within one year of exceeding 400 hours of operation in 12 consecutive months.	*Recordkeeping/ Operating Reports*			X
5	31.6a	NO_X MR&R - REPORTING	1-3, 8-13	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine identification, highest load recorded during the period covered by the operating report.	*Recordkeeping* *Reporting not required during certification period.*			X
5	31.6b	NO_X MR&R - REPORTING	1-3, 8-13	Turbines	For turbines that normally operate less than 400 hours in any 12 months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
5	31.6c	NO_X MR&R - REPORTING	1-3, 8-13	Gas Turbines	Submit an excess emissions/ permit deviation report if: a test result exceeds the emission standard, Method 20 testing is required by Condition 31.2 or 31.5b but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedance of emission limits in Conditions 6 and/or 31.	*Recordkeeping/ Operating Reports/ Source test data* *EE/PD reporting not required during the certification period.*			X

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5	32, 32.1a	NSPS Subpart GG - SO_2 Standard	1-14	Turbines	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 0.8 percent by weight. Demonstrate compliance by either (i) demonstrating that the fuels fired in these emission units meet the definition of natural gas found in 40 CFR 60.331(u), or (ii) monitoring the total sulfur content of the fuels burned in these emission units as required under 40 CFR 60.334(h)(1), 60.334(i)(2) or (3), and 60.335(b)(10)(ii), or (iii) determining the sulfur content of fuel gas at least monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or use readings from the KUTP CEMS, or an alternative analytical method approved by EPA.	*Operating Reports* *ASTM Method D 4810 and/or KUTP CMS*	X		
5	32, 32.1b	NSPS Subpart GG SO_2 Standard	4-9, 12, 13	Turbines	Do not allow the sulfur content of the liquid fuel burned in these emission units to exceed 0.8 percent by weight. Except as allowed by an EPA-approved custom fuel monitoring schedule, determine compliance by monitoring the total sulfur content of the fuel using ASTM D129-00, D2622-98, D4294-02, D1266-98, D5453-00, D1552-01, or an alternative analytical method approved by EPA. Monitoring shall be conducted either: 1) each day that liquid fuel is burned in an affected emission unit; or 2) for each delivery of liquid fuel to the fuel storage tank for an affected emission unit.	*Recordkeeping/ Operating Reports* *ASTM Method D 7039 (ULSD)* *ASTM Method D 2622-10 (LEPD)*	X		
5	32.2	NSPS Subpart GG SO_2 Standard	1-14	Turbines	Fuel sulfur analysis 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.	*Recordkeeping*	X		
5	32.3, 32.4	Recordkeeping for NSPS Subpart GG SO_2 Standard	1-14	Turbines	Keep records of monthly fuel gas and liquid fuel sulfur analyses. Submit a summary of monthly fuel gas and liquid fuel sulfur analytical results with each Operating Report.	*Recordkeeping/ Operating Reports*	X		

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5	32.5, 32.7	Recordkeeping and reporting for NSPS Subpart GG SO_2 Standard	1-14	Turbines	Maintain a record documenting a constant supplier or source of fuel gas and liquid fuel. A substantial change in fuel quality is considered a change in fuel supply. If there is a change to either the supplier or the source of fuel, notify EPA Region 10 within 60 days of such change.	*Recordkeeping*	X		
5	32.6	Recordkeeping and reporting for NSPS Subpart GG SO_2 Standard	1-14	Turbines	Maintain a record of all affected turbine operation on fuels other than natural gas. Notify EPA Region 10 of the use of any fuel other than natural gas within 60 days of such use.	*Recordkeeping*	X		
5	32.8a, b	Reporting for NSPS Subpart GG SO_2 Standard	1-14	Turbines	Submit an excess emissions report if - a) the fuel gas or fuel oil sulfur content exceeds 0.8% sulfur by weight or b) monitoring is required under Condition 32.1 but not performed.	*Recordkeeping/ Operating Reports* *Excess emissions reporting not required during the certification period.*			X
5	32.9	Reporting for NSPS Subpart GG SO_2 Standard	1-14	Turbines	Annually report the results of monthly fuel gas and liquid fuel sulfur analyses to EPA as part of the annual NSPS excess emissions report to U.S. EPA Region 10 in accordance with 40 CFR 60.7(c) and (d). Report excess emissions for all periods of unit operation, including startup, shutdown and malfunction.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted in a timely manner.*	X		
6	33	NSPS Subpart J - SO2 Emissions Standards	16, 30	Born Crude Heater (KUTP), Kaldair Flare I-58-VS	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 162 ppmv, averaged over three consecutive hours. Monitor and record the H_2S content of the fuel burned using the CEMS at the KUTP.	*Recordkeeping*	X		
6	33.1	NSPS Subpart J - SO2 Emissions Standards	16, 30	Born Crude Heater (KUTP), Kaldair Flare I-58-VS	Maintain and operate in good working order two continuous monitoring systems at the KUTP for monitoring and recording the concentration (on a dry basis) of H_2S in fuel gases prior to (i.e., upstream of) the fuel gas combustion devices at the KUTP.	*Recordkeeping/ Reporting*	X		

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							Continuous	Intermittent	Not Triggered
6	33.2	NSPS Subpart J - SO2 Emissions Standards	16, 30	Born Crude Heater (KUTP), Kaldair Flare I-58-VS	The span value for the KUTP fuel gas continuous monitoring systems must be 425 mg/dscm (300 ppmv at 59 deg F) H_2S. Conduct an initial performance evaluation and Relative Accuracy Test (RATA) of the CEMS and at such times as requested by EPA. The performance evaluation must be conducted in accordance with Performance Specification 7 in Appendix B of 40 CFR 60. Method 11, 15, 15A, or 16 shall be used for conducting the RATA. Furnish two (or more, if requested) copies of the Performance Evaluation and RATA report to EPA within 60 days of completion.	*Recordkeeping* *Initial testing completed as required* *No requests for additional evaluations from EPA during the certification period.*	X		
6	33.3	NSPS Subpart J - SO2 Emissions Standards	16, 30	Born Crude Heater (KUTP), Kaldair Flare I-58-VS	Report and record according to Conditions 24 and 25.	*Recordkeeping* *EEMSP reports and/or Summary Reports were submitted to EPA in a timely manner.* *A Permit Deviation Report was submitted on 2/11/2019 with the 4Q 2018 Operating Report (the Permit Deviation Report was amended on 2/12/2019 and 3/12/19) for failing to submit a copy of the Subpart J EEMSP Report and Summary Report Form to ADEC.*		X	
6	34	NSPS Subpart GGG/ VV	30, 31	Flares	Operate these emission units at all times when emissions may be vented to them. These flares shall comply with 40 CFR 60.18, as stated in Condition 28.	*Recordkeeping*	X		
6	34	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Operate the closed vent systems at KUTP at all times when emissions may be vented to them.	*Recordkeeping*	X		
6	34.1	NSPS Subpart GGG/ VV	30, 31, 57	Flares, KUTP CVS	Monitor the flares and CVS to ensure that they are operated and maintained in conformance with their designs.	*Recordkeeping*	X		
6	34.2	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Conduct annual visual inspections for visible, audible, or olfactory indications of leaks for each closed vent system located at KUTP.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
6	34.3, 34.4	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Repair leaks as soon as practicable, but no later than 15 calendar days after detection. If the repair is infeasible without a process unit shutdown, repair the equipment before the end of the next process unit shutdown. A first attempt repair should be made no later than 5 calendar days after each leak is detected.	*Recordkeeping*			X
6	34.5	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Monitor pumps, valves, pressure relief devices, flanges and other connectors no later than 5 calendar days after any evidence of a potential leak using Method 21 to confirm leak. [Method 21 not required if leak is assumed and leak repairs are made.]	*Recordkeeping*			X
6	34.6, 34.7	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Repair leaks as soon as practicable, but no later than 15 calendar days after detection. If the repair is infeasible without a process unit shutdown, repair the equipment before the end of the next process unit shutdown. A first attempt repair should be made no later than 5 calendar days after each leak is detected.	*Recordkeeping*			X
6	34.8a	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Mark all leaks with a weatherproof and readily visible identification tag with the equipment's identification number. The tags may be removed after repairs to the equipment.	*Recordkeeping*			X
6	34.8b	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Keep a log of each leak in a readily accessible location for 5 years, which includes: a) instrument, operator, and equipment identification numbers b) date leak was detected, dates of attempts to repair c) repair methods of leaks d) "above 10,000 ppm" if the Method 21 reading is above 10,000 ppm after a repair attempt e) "repair delayed" if leak is not repaired within 15 days of discovery, and reason for delay f) signature of designate to decide process shutdown is necessary g) expected date of successful repair/ date of successful repair h) dates of process unit shutdown while equipment is not repaired i) date of successful repair.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
6	34.9	NSPS Subpart GGG/ VV	30, 31, 57	Flares, Kuparuk Unit Topping Plant (KUTP)	Keep in a readily accessible location records of the following for the control devices and closed vent systems: a) detailed schematics, design specifications and P&IDs b) dates and descriptions of any changes in design specifications c) description of parameters monitored to ensure that control devices are operated and maintained in conformance with their desitn and an explanation of why parameters were selected for the monitoring d) periods when the closed vent system and control devices are not operated as designed, including periods when the flare pilot light does not have a flame e) dates of startups and shutdowns of the closed vent systems and control devices.	*Recordkeeping*	X		
6	34.10	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Keep the following in a readily accessible location: a) list of identification numbers for the equipment subject to Subpart GGG b) list of identification numbers for equipment in vacuum service	*Recordkeeping*	X		
6	34.11	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Submit semi-annual reports to EPA and ADEC which include: a) process unit identification, b) explanations of repair delays, why process unit shutdowns were infeasible, c) dates of process unit shutdowns occurring within the reporting period, d) revisions to items reported in the previous semi-annual report, where applicable.	*Recordkeeping* *A Permit Deviation Report was submitted on 2/11/2019 with the 4Q 2018 Operating Report (the Permit Deviation Report was amended on 2/12/2019 and 3/12/19) for failing to submit a copy of the NSPS Subpart GGG/VV semi-annual report to ADEC.*		X	
6	35	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Design and operate sampling connection systems to meet the requirements of 40 CFR 60.482-5.	*Recordkeeping/ Reasonable Inquiry*	X		
6	36	NSPS Subpart GGG/ VV	57	Kuparuk Unit Topping Plant (KUTP)	Equip open-ended valves or lines with a cap, blind flange, plug, or a second valve and operate them in accordance with the provisions of 40 CFR 60.482-6.	*Recordkeeping/ Reasonable Inquiry* *There are no open-ended valves at CPF-1.*			X

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							Continuous	Intermittent	Not Triggered
7	37	ORL - Operating Hours	19-28	Diesel-Fired Equipment	Do not operate emergency equipment for more than 200 hours each per consecutive 12-month period. This limit does not apply to emergency operations.	*Recordkeeping/ Operating Reports*	X		
7	37.1, 37.2	ORL - Operating Hours	19-28	Diesel-Fired Equipment	Monitor and record the monthly and consecutive 12-month period operating time for each emission unit and report in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	37.3	ORL - Operating Hours	19-28	Diesel-Fired Equipment	If total hours of operation for any emission unit exceeds 200 hours per consecutive 12-month period, submit an excess emission report.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
7	38	ORL (43 MMBtu/hr firing rate)	16	Born Crude Heater (KUTP)	Limit the firing rate to no more than 43 MMBtu/hr heat input rate.	*Recordkeeping*	X		
7	38.1	ORL (43 MMBtu/hr firing rate)	16	Born Crude Heater (KUTP)	Do not allow the maximum daily average fuel consumption rate to exceed 0.039 MMscf/hr based on a LHV of 1,100 MMBtu/MMscf.	*Recordkeeping*	X		
7	38.2, 38.3	ORL (43 MMBtu/hr firing rate)	16	Born Crude Heater (KUTP)	Monitor and record the daily operating time and fuel consumption. Calculate the average fuel consumption rate (MMscf/hr) on a daily basis and report the maximum daily average fuel consumption rate for each month in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	38.4	ORL (43 MMBtu/hr firing rate)	16	Born Crude Heater (KUTP)	If the firing rate exceeds 43 MMBtu/hr submit an excess emission report.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
7	39	ORL to Avoid Classification as PSD Major	1-3	GE Frame 3 Turbines	Limit NO_X emissions from these emission units, combined, to no greater than 824 tons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
7	39.1, 39.2	ORL to Avoid Classification as PSD Major	1-3	GE Frame 3 Turbines	Monitor and record NOx emissions according to Condition 6.1 and report the 12 consecutive month period summation of NOx emissions from these emission units, combined, for each month in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	39.3	ORL to Avoid Classification as PSD Major	1-3	GE Frame 3 Turbines	Submit an excess emission report if any 12 consecutive month summation of NOx emissions from these units, combined, exceeds 824 tons.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
7	40, 40.1	ORL to Avoid Classification as PSD Major	42, 46, 47	DS1E and DS1J Production Heaters	Limit the combined total heat input rating of these emission units to no more than 184 MMBtu/hr heat input rate. Report the make and rating of each production heater in the next Operating Report following initial startup of each unit.	*Recordkeeping/ Operating Reports* *Documentation submitted to ADEC April 21, 2006 in the first quarter 2006 Operating Report*	X		
7	41	ORL to Avoid Classification as PSD Major	34, 42, 46, 47, 59	Portable Flare, DS1E and DS1J Production Heaters, Drill Rig Heaters and Boilers	Limit combined SO_2 emissions from these emission units to no greater than 35 tons per 12 consecutive month period.	*Recordkeeping/ Operating Reports*	X		
7	41.1	ORL to Avoid Classification as PSD Major	59	Drill Rig Heaters and Boilers	Calculate and record the total SO_2 emissions for each calendar month using monthly fuel oil use measured in Condition 10 and the fuel sulfur content measured in Condition 13.1. If the fuel use records are missing or incomplete for any unit, calculate SO_2 emissions based on operating hours and maximum design fuel use rates.	*Recordkeeping*	X		
7	41.2	ORL to Avoid Classification as PSD Major	42, 46, 47	DS1E and DS1J Production Heaters	Calculate and record the total SO_2 emissions for each calendar month using fuel consumption measured in Condition 10 and fuel gas H_2S content measured in Condition 12.1. If the fuel consumption records are missing or incomplete for any emission unit, estimate SO_2 emissions based on operating hours and maximum design fuel consumption rates.	*Recordkeeping/ Operating Reports*	X		
7	41.3	ORL to Avoid Classification as PSD Major	34	Portable Flare	Calculate and record SO_2 emissions for each calendar month using the fuel gas consumption measured in Condition 10 and the fuel H_2S content.	*Recordkeeping/ Operating Reports* *Emissions are zero - **EU ID 34** has never been used.*			X

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							Continuous	Intermittent	Not Triggered
7	41.4, 41.5	ORL to Avoid Classification as PSD Major	34, 42, 46, 47, 59	Portable Flare, DS1E and DS1J Production Heaters, Drill Rig Heaters and Boilers	Calculate and record the 12 consecutive month SO_2 emissions from these emission units combined. Report the 12 consecutive month SO_2 emissions for these emission units, combined, for each month of the reporting period, with each Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	42	ORL to Avoid Classification as PSD Major	56	Temporary Crude Oil Storage Tanks	Limit VOC emissions from these tanks at DS1E and DS1J to a combined total no greater than 34 tons per 12 consecutive month period.	*Recordkeeping*	X		
7	42.1	ORL to Avoid Classification as PSD Major	56	Temporary Crude Oil Storage Tanks	Record the following information, when sending live crude oil to these tanks, to monitor the venting of VOCs: a) date and time that venting began and ended; b) event description (well name, type of activity, etc.); c) description of fluids introduced to the temporary crude oil storage tank(s); d) volume of liquid accumulated in the temporary crude oil storage tank(s); e) estimated percentage of live crude oil in the total liquid volume accumulated in the temporary crude oil storage tank(s); f) estimated volume of gas vented; g) estimated tonnage of VOCs vented; and h) operational comments and/or assumptions used for estimated volumes recorded in d) and f).	*Recordkeeping*	X		
7	42.2	ORL to Avoid Classification as PSD Major	56	Temporary Crude Oil Storage Tanks	Estimate the monthly tonnage of total VOC emissions from these tanks at DS1E and DS1J.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
7	42.3	ORL to Avoid Classification as PSD Major	56	Temporary Crude Oil Storage Tanks	Include with each Operating Report: a) the monthly estimated VOC emissions from these tanks at DS1E and DS1J and the 12 consecutive month VOC emissions, for each calendar month in the reporting period; b) the input and output from simulation models and software used to estimate VOC emissions; and c) all calculations and assumptions used to estimate VOC emissions.	*Recordkeeping/ Operating Reports* ***A Permit Deviation Report was submitted on 3/12/2019 for failing to include the information required by Conditions 42.3b and 42.3c in the 3Q 2018 Operating Report.***		X	
7	43	ORL for Incinerators	35 & 36	Incinerators	Do not allow the combined throughput of emission units 35 & 36 to exceed 5,500 tons per rolling 12-month period.	*Recordkeeping*	X		
7	43.1, 43.2	ORL for Incinerators	35 & 36	Incinerators	Monitor and record the monthly and consecutive 12-month total summation of solid waste throughput for emission units 35 & 36. Report the monthly and consecutive 12-month total summation of solid waste throughput for each month in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	43.3	ORL for Incinerators	35 & 36	Incinerators	If the consecutive 12-month summation of solid waste throughput exceeds 5,500 tons submit an excess emissions report.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
7	44	ORL for Incinerators	36	Comptro Incinerator	Limit the charging rate to 765 pounds of waste per hour.	*Recordkeeping* ***EU ID 36 is no longer in service***	X		
7	44.1, 44.2	ORL for Incinerators	36	Comptro Incinerator	Record the total hours of combustion and the amount of waste combusted on a daily basis. Calculate the hourly average charging rate in lb/hr based on the daily data.	*Recordkeeping* ***EU ID 36 is no longer in service***	X		
7	44.3	ORL for Incinerators	36	Comptro Incinerator	Report the monthly maximum hourly average charging rates (lb/hr) in the Operating Report.	*Recordkeeping/ Operating Reports* ***EU ID 36 is no longer in service***	X		
7	44.4	ORL for Incinerators	36	Comptro Incinerator	If the hourly average charging rate exceeds 765 lb/hr submit an excess emissions report.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.* ***EU ID 36 is no longer in service***			X
7	45	ORL for Incinerators	35 & 36	Incinerators	Each of the incinerators shall burn ten percent or less sewage sludge on a dry basis.	*Recordkeeping*	X		
7	45.1	ORL for Incinerators	35 & 36	Incinerators	Maintain daily records of estimated dry percent sewage sludge charging rates incinerated.	*Recordkeeping*	X		

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7	45.2	ORL for Incinerators	35 & 36	Incinerators	Upon request submit records collected under Condition 45.1 to EPA or ADEC.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
7	45.3	ORL for Incinerators	35 & 36	Incinerators	Submit an excess emissions report if the charge rate of sewage sludge burned is greater than 10 percent on a dry basis of the total feed stream.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
7	46	ORL for Incinerators	35 & 36	Incinerators	Limit the fuel feed stream of each of the incinerators to ten percent or less of hospital waste and medical/infectious waste as measured on a calendar quarter basis.	*Recordkeeping*	X		
7	46.1, 46.2	ORL for Incinerators	35 & 36	Incinerators	Monitor and record an estimate of the relative weight of hospital/medical/infectious and other fuels and wastes combusted in each incinerator. Keep records on a calendar quarter basis.	*Recordkeeping*	X		
7	46.3	ORL for Incinerators	35 & 36	Incinerators	Upon request submit records collected under Condition 46.2 to EPA or ADEC.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
7	46.4	ORL for Incinerators	35 & 36	Incinerators	If hospital waste and medical/infectious waste exceeds 10 percent of the fuel feed stream on a quarterly basis submit an excess emissions report.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
7	47	ORL for Incinerators	35 & 36	Incinerators	Burn greater than 30 percent municipal solid waste or refuse-derived fuel as a percentage of all fuels and wastes burned.	*Recordkeeping*	X		
7	47.1	ORL for Incinerators	35 & 36	Incinerators	Keep records on a calendar quarter basis of the weight of municipal solid waste burned, and the weight of all other fuels and wastes burned.	*Recordkeeping*	X		
7	47.2	ORL for Incinerators	35 & 36	Incinerators	Upon request submit records collected under Condition 47.1 to EPA or ADEC.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
7	47.3	ORL for Incinerators	35 & 36	Incinerators	Submit an excess emissions report if the percentage of all fuels and wastes burned on a quarterly basis is not greater than 30 percent municipal solid waste or refuse-derived fuel.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
8	48	NESHAP Applicability	All	NA	Determine applicability for the stationary source under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement.	*Used EPA and GRI HAPS emission factors to calculate HAPS and prepare applicability determinations.* *40 CFR 63 Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) apply to EU IDs 19 through 28, 64, and 65 at CPF1. (**Note:** EU IDs 64 and 65 have been shutdown and removed from DS1R as of November 2015. EU IDs 19, 20, & 21 are out of service. EU IDs 20 & 21 were replaced by EU IDs 69 & 70, which are subject to NSPS Subpart IIII.)*	X		
8	48.1	NESHAP Applicability	All	NA	Keep a record of NESHAPs applicability determination. Maintain records for 5 years or until emission unit changes operation and becomes an affected emission unit.	*Recordkeeping*	X		
8	49.1	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(b): No person testing, maintaining, servicing, repairing or disposing of halon-containing equipment or using such equipment for technician training may knowingly vent or otherwise release into the environment any halon used in such equipment, except: -Minimal release associated with good faith attempts to recycle or recover halon -Release of residual halon contained in fully discharged total flooding fire extinguishing systems -Release of halon during testing -Emergency release of halon for the legitimate purpose of fire extinguishing, explosion inertion or other emergency application for which the equipment or systems were designed.	*Recordkeeping* *Technician certification and training.*	X		
8	49.2	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(c): Technicians who test, maintain, service, repair or dispose of halon-containing equipment shall be trained regarding halon emissions reduction within 30 days of hiring.	*Recordkeeping* *Technician certification and training.*	X		

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							Continuous	Intermittent	Not Triggered
8	49.3	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(d): Do not dispose of halon-containing equipment.	*Recordkeeping* *Technician certification and training.*	X		
8	49.4	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(e): Do not dispose of halon.	*Recordkeeping* *Technician certification and training.*	X		
8	49.5	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(f): No owner of halon-containing equipment shall allow halon release to occur as a result of failure to maintain such equipment.	*Recordkeeping* *Technician certification and training.*	X		
8	50.1	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(b): Do not use a substitute for an ozone depleting compound known to be manufactured, processed, or imported in violation of 40 CFR 82 Subpart G or any use restrictions in the acceptability determination.	*Recordkeeping*	X		
8	50.2	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(c): Do not use a substitute without adhering to any use restrictions set by acceptability determination.	*Recordkeeping*	X		
8	50.3	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(d): Do not use a substitute after effective date of any rule-making adding such substitutes to list of unacceptable substitutes.	*Recordkeeping*	X		

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9	51, 51.1, 51.2, 51.3	Off Permit Changes	All	NA	CPAI may make changes that are not addressed or prohibited by this permit, without permit revision, provided that the following requirements are met: - Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; - For off permit changes that result in additional emission units that do not qualify as insignificant, or are greater than 400 hp or equivalent firing rate at the stationary source, CPAI shall submit notice to the Department describing the change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change; and - A record is kept describing changes made at the 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.	*Recordkeeping*	X		
9	52, 52.1	Operational Flexibility	All	NA	CPAI may make 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 Clean Air 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). For a change in operation, CPAI shall no less than 7 days in advance of the proposed changes, submit a copy of the required notice information to the Department, including: - a brief description of the change; - 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.	*Recordkeeping* *Not triggered*			X
9	53	Permit Renewal	All	NA	Submit an application to renew the Title V permit 6 to 18 months before expiration of current Title V permit. (No sooner than November 27, 2006 and no later than November 27, 2007.) The renewal application shall be complete before May 27, 2008.	*Permit renewal application submitted November 19, 2007.*	X		

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							Continuous	Intermittent	Not Triggered
10	54.3	Insignificant Emission Units with Actual Emissions > IEU Thresholds	19-28 IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Recordkeeping/ Operating Reports/ Reasonable Inquiry*			X
10	55	Visible Emissions for IEUs	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) must not exceed 20% for more than 3 minutes in any 1 hour or more than 20% averaged over any 6 consecutive minutes.	*Monitoring not required. Reasonable inquiry.*	X		
10	56	PM Standard for IEUs	IEUs	Insignificant Emission Units	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Monitoring not required. Reasonable inquiry.*	X		
10	57	Sulfur Compound Emissions for IEUs	IEUs	Insignificant Emission Units	Sulfur compound emissions from these emission units, expressed as SO_2, shall not exceed 500 ppm averaged over three hours.	*Monitoring not required. Reasonable inquiry.*	X		
11	58, 58.1, 58.2, 58.3, 58.4	Exclusion Zones	DS1E and DS1J	NA	Establish ambient air boundary exclusion zones around DS1E and DS1J as described in Conditions 58.1 and 58.2 when drill rigs conduct post-construction drilling at these sites on or after March 20, 2006. Control public access within the zones in accordance with Condition 59.	*Recordkeeping* *End date for post-construction drilling at 1E and 1J was "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*			X
11	59, 59.1, 59.2	Restriction of Public Access within Exclusion Zones	DS1E and DS1J	NA	Prohibit public access within the exclusion zones established under Condition 58 by: 1) posting the area with lighted or reflective signs with at least 3 sings along each side of the exclusion zone, spaced no more than 300 meters apart. Place one sign adjacent to the road leading to the well pad at the exclusion zone; and 2) Maintaining surveillance in accordance with Conditions 60 and 61.	*Recordkeeping* *End date for post-construction drilling at 1E and 1J was "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*			X

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							Continuous	Intermittent	Not Triggered
11	60, 61.6	Exclusion Zone Surveillance	DS1E and DS1J	NA	Designated surveillance personnel shall observe the area between the pad edge and the edge of the exclusion zone at least once per day. The surveillance personnel shall log the time and date of the location patrol using the form in Section 21 of the permit and shall maintain the logs on location in the rig supervisor's office or in another on-site location designated by the CPAI rig supervisor. The completed surveillance forms shall be maintained on location until completion of the operation. At that time, all completed forms should be sent to the Kuparuk Field Environmental Compliance Coordinator for maintenance. All completed forms shall be maintained for a period of one year after the completion of operations unless otherwise requested by the Department.	*Recordkeeping* *End date for post-construction drilling at 1E and 1J was "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*			X
11	61, 61.1, 61.2, 61.3, 61.4	Exclusion Zone Surveillance	DS1E and DS1J	NA	If unauthorized person(s) are encountered in the air exclusion zone, the surveillance individual or security personnel shall request that the person leave, inform the person of the situation, take appropriate action, and maintain a log of the encounter. If the unauthorized individual(s) refuse to leave, they shall be informed that neither CPAI nor any State agency will be liable or responsible for any harm the unauthorized person(s) may encounter by being in a restricted entry area. The surveillance individual will also request the name or names of the unauthorized person(s) at that time. The surveillance individual will then log the encounter with the unauthorized person(s) on the surveillance form. Include the information listed in Condition 61.3 in the log in these situations. The surveillance individual shall also report such incidents to the CPAI rig supervisor or their designated alternate at the next available opportunity.	*Recordkeeping* *Not triggered during the certification period.* *End date for post-construction drilling at 1E and 1J was "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
11	61.5	Exclusion Zone Surveillance	DS1E and DS1J	NA	Include summary information regarding any exclusion zone violations in the Operating Report.	*Recordkeeping/ Operating Reports* *End date for post-construction drilling at 1E and 1J was "2009" (specific month undetermined). Letter documenting this date submitted to ADEC on March 5, 2012.*			X
11	62	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.154: No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
11	62	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.156: All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping* *Contractor certification and training.*	X		
11	62	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.161: Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
11	62	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.162: All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		
11	62	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and recordkeeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
11	63	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X
11	63	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
11	63	Asbestos NESHAP	All	NA	Keep records in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
11	63	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61, Subpart A and Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
11	64	Benzene Waste Operations NESHAP	57	KUTP	Maintain records of each waste stream not controlled for benzene emissions.	*Recordkeeping*	X		
					Submit to the Administrator a report that updates the information listed under 40 CFR 61.357(a)(1) through (3) in the event a change in the process generating the waste has occurred that could cause the total annual benzene quantity from this emission unit to increase to 1 Mg/yr or more.	*Recordkeeping* *Not triggered during the certification period.*			X
11	65a	Good Air Pollution Control	15, 17, 18, 19-28, 29, 32, 33, 34, 37-41, 43-45, 48-50, 56, 58-60	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
11	65b	Good Air Pollution Control	15, 17, 18, 19-28, 29, 32, 33, 34, 37-41, 43-45, 48-50, 56, 58-60	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
11	65c	Good Air Pollution Control	15, 17, 18, 19-28, 29, 32, 33, 34, 37-41, 43-45, 48-50, 56, 58-60	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
11	66	Open Burning	All	NA	Conduct any open burning in accordance with 18 AAC 50.065.	*Reasonable Inquiry*			X
11	67, 67.3	Fugitive Emissions	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable Inquiry*	X		
11	67.1	Fugitive Emissions	35 & 36	Incinerators	Maintain records of complaints received by the Permittee and complaints that were received by the Department and then conveyed to the Permittee and a record of any additional precautions that are being taken to address complaints or to address potential problems found during a Department inspection and precautions taken to prevent future dust problems.	*No known complaints or problems found by ADEC during the certification period.*			X
11	68	Dilution	1-47	NA	Do not dilute emissions to comply with permit.	*Reasonable Inquiry*	X		
11	69	Stack Injection	1-47	NA	Do 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 unless approved in writing by ADEC.	*Reasonable Inquiry*	X		
11	54.2, 70	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Reasonable Inquiry*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
11	70.1, 67.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety by completing an excess emissions report.	*Recordkeeping* *No known emissions that present a threat to human health or safety during the certification period.*			X
11	70.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 70.	*Recordkeeping* *No known complaints during the certification period.*			X
11	70.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if ADEC notifies CPAI that it has found a violation of Condition 70.	*Recordkeeping* *No known complaints during the certification period.*			X
11	70.4	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping* *No known complaints during the certification period. as documented in Operating Reports.*			X
11	70.5, 67.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Include a brief summary report with the Operating Report which contains: -the number of complaints received -number of times CPAI or ADEC found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports*	X		
11	70.6, 67.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Notify ADEC of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *CPAI did not receive any complaints.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
11	71	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard.	*Recordkeeping* *No emissions in excess of a technology-based emissions standard were noted during the certification period.*			X
11	71	Technology Based Emission Standard	All	NA	Give ADEC written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered.	*Recordkeeping* *No emissions in excess of a technology-based emissions standard were noted during the certification period.*			X
12	72	ADEC Requested Source Tests	All	NA	Conduct source testing as requested by ADEC.	*ADEC did not request source tests during the certification period.*			X
12	73-81	General Source Testing Requirements	All	NA	Comply with the provisions of Section 12 when source tests are conducted.	*Recordkeeping*	X		
13	54.1, 82	Certification	All	All emission units, including insignificant emission units	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		
13	83	Submittals	All	NA	Send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping*	X		
13	84	Information Requests	All	NA	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
13	85	Recordkeeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	86.1a	Excess Emission and Permit Deviation Reports	All	NA	Report emissions that present a potential threat to human health or safety and excess emissions that CPAI believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *No EE reports in this classification were required during the certification period.*			X
13	86.1b	Excess Emission and Permit Deviation Reports	All	NA	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *No EE reports in this classification were required during the certification period.*			X
13	86.1c(i)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations not described in Conditions 86.1a, 86.1b, and 86.1c(ii)-(iii) within 30 days of end of month in which the emissions or deviation occurred or was discovered.	*Recordkeeping* *Excess emissions/ Permit deviation reports* *Operating Reports*	X		
13	86.1c(ii), (iii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery and for failure to monitor as required in other applicable conditions of the permit.	*Recordkeeping* *No EE or PD reports in this classification were required during the certification period.*			X
13	86.2	Excess Emission Reports	All	NA	Report excess emissions using ADEC's online form or form in Section 20 of Operating Permit No. AQ0267TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Excess emissions reports* *Operating Reports*	X		
13	86.3	Permit Deviation Reports	All	NA	Report permit deviations using ADEC's online form or form in Section 20 of Operating Permit No. AQ0267TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Permit deviation reports* *Operating Reports*			X
13	86.4	Excess Emission and Permit Deviation Reports	All	NA	Provide more detailed written report when requested by ADEC.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	87.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs reports submitted to EPA as required by Conditions 24 - 26, 32.6, 32.7, 32.9, 34.11, 45.2, 46.3, 47.2, 63 and 64 with the Operating Report unless copies have already been provided to ADEC at time of submittal.	*Recordkeeping* *A Permit Deviation Report was submitted on 2/11/2019 with the 4Q 2018 Operating Report (the Permit Deviation Report was amended on 2/12/2019 and 3/12/2019) for failing to submit a copy of the NSPS Subparts J and GGG/VV reports required under Conditions 24, 25, 33.3, and 34.11 to ADEC and not including a copy of these reports in an Operating Report.*		X	
13	87.2	NSPS and NESHAP Reports	All	NA	Provide ADEC a written copy of any EPA granted waivers of federal emission standards, recordkeeping, monitoring, performance testing, reporting requirements or custom monitoring schedules upon request by ADEC.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
13	88	Operating Report	All	NA	Submit an original and 2 copies of a quarterly Operating Report by April 30 for January 1 to March 31, by July 30 for April 1 to June 30, by October 30 for July 1 to September 30 and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
13	88.1	Operating Report	All	NA	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports* *The following EE/PD reports included a deviation from Condition 88.1:* *Discovered: 1/25/2019; Occurred: 10/29/2018* *Submitted: 2/11/2019 (amended 2/12/2019 and 3/12/19)* *Discovered: 3/4/2019; Occurred: 10/29/2018* *Submitted: 3/12/2019*		X	
13	88.2a	Operating Report	All	NA	If excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify: - date of deviation - equipment involved - permit condition affected - description of excess emissions or permit deviation - any corrective action or preventative measures taken and dates of such actions.	*Recordkeeping*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	88.2b	Operating Report	All	NA	When excess emissions or permit deviations during the reporting period have already been reported, cite the date(s) of those report(s) in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
13	89	Annual Compliance Certification	All	NA	- Submit an original and two copies of annual compliance certification report for the prior year by March 31. - Submit a copy of annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping The annual compliance certification was sent to ADEC and EPA by March 31.*	X		
16	98, 98.1	Visible Emissions Monitoring	4-9, 12, 13, 15, 18, 19-28, 60	Diesel-Fired Equipment	As required by Condition 3.3, 3.4, or 3.8, perform a Method 9 visible emissions observation for affected emission units. Conduct the observation within 90 days after triggering this condition.	*Recordkeeping/ Operating Reports* ***EU IDs 4 - 9, 12, 13, and 15*** *burned only gas or did not operate.* ***(EU IDs 18, 19, 20, & 21 are no longer in service)*** ***EU IDs 22 - 28*** *operated 400 hours or less.* ***EU ID 60*** *consumed less than 13,500 gallons of fuel.*			X
16	98, 98.1	Visible Emissions Monitoring	35, 36	Incinerators	Perform a Method 9 visible emissions observation on each of these emission units once per calendar year.	*Method 9/ Recordkeeping* ***EU ID 36 is no longer in service***	X		
16	98.1a	Visible Emissions Monitoring	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Method 9/ Recordkeeping*	X		
16	98.1b	Visible Emissions Monitoring	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	If 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent, perform corrective action as described under Condition 99.	*Method 9/ Recordkeeping* *Corrective action not triggered*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
16	98.2	Visible Emissions Reporting	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	Include with each Operating Report the results of all Method 9 readings conducted during the reporting period.	*Recordkeeping/ Operating Reports*	X		
16	99	Corrective Actions Resulting from VEOs	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	Perform corrective actions within 14 days if 18 consecutive minutes of Method 9 observations result in an 18 minute average opacity >20 percent and conduct a follow-up Method 9 observation in accordance with Condition 98.1 within 30 days of completing the corrective action.	*Method 9/ Recordkeeping* *No corrective action required*			X
16	99.1	Recordkeeping for Corrective Actions	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	Keep written records of the starting date, completion date, and a description of any actions taken to reduce visible emissions.	*Recordkeeping* *No corrective action required*			X
16	99.2	Reporting of Corrective Actions	4-9, 12, 13, 15, 18, 19-28, 35, 36, 60	Diesel-Fired Equipment and Incinerators	Include copies of records required by Condition 99.1 with each Operating Report.	*Recordkeeping*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
16	100, 100.1, 100.2a, b, 100.4	PM Monitoring for Liquid Fuel-Fired Engines and Turbines	4-9, 12, 13, 19-28, 60	Diesel-Fired Equipment	Conduct a PM source test no later than 180 days after the first follow-up Method 9 observation performed under Condition 99 results in a) an 18-minute average opacity >20% or b) for stacks with a diameter less than 18 inches, if the 18 minute average opacity is greater than 15% but not more than 20%. (This requirement is waived for an individual emission unit if a PM source test on the unit has shown compliance with the PM standard since permit issuance or if a follow-up VEO conducted using Method 9 during the 180 days shows that the situations in a) and/or b) no longer occur.)	*PM source test not required*			X
16	100.3a	PM Reporting for Liquid Fuel-Fired Engines and Turbines	4-9, 12, 13, 19-28, 60	Diesel-Fired Equipment	During each PM source test, perform an 18-minute visible emission observation to obtain 72 individual 15-second readings, and submit a summary of the results to ADEC with the PM source test report. Submit the source test report in accordance with Condition 81.	*PM source test not required*			X
16	100.3b	PM Reporting for Liquid Fuel-Fired Engines and Turbines	4-9, 12, 13, 19-28, 60	Diesel-Fired Equipment	Submit an excess emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours. In addition, report observations in excess of the threshold of Condition 100.2b within 30 days of the end of the month in which the observations occur.	*PM source test not required*			X
16	101, 101.1, 101.3	PM Monitoring for Incinerators and Liquid Fuel-fired Heaters	15, 18, 35, 36	Incinerators and Liquid Fuel-Fired Heaters	Conduct a PM source test no later than 180 days after the first follow-up Method 9 observation performed under Condition 99 results in an 18-minute average opacity >20%. (This requirement is waived for an individual emission unit if a PM source test on the unit has shown compliance with the PM standard since permit issuance or if a follow-up VEO conducted using Method 9 during the 180 days shows that an 18-minute average opacity is < or = 20%.)	*PM source test not required*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
16	101.2a	PM Reporting for Incinerators and Liquid Fuel-fired Heaters	15, 18, 35, 36	Incinerators and Liquid Fuel-Fired Heaters	During each PM source test, perform an 18 minute visible emission observation to obtain 72 individual 15-second readings, and submit a summary of the results to ADEC with the PM source test report. Submit the source test report in accordance with Condition 81.	*PM source test not required*			X
16	101.2b	PM Reporting for Incinerators and Liquid Fuel-fired Heaters	15, 18, 35, 36	Incinerators and Liquid Fuel-Fired Heaters	Submit an excess emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours for emission units 15 & 18, 0.15 grains/dscf averaged over 3 hours for emission unit 35, and 0.10 grains/dscf averaged over 3 hours for emission unit 36 (see Condition 4).	*PM source test not required*			X
16	102, 102.1	Monitoring for Flare VEOs	29-33	Flares	Monitor the first six scheduled daylight flare events during the life of the permit using Method 9 for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping* *All 6 flare events required by the permit have been completed.*	X		
16	102, 102.1	Monitoring for Flare VEOs	34	Portable Flare	Conduct an initial visible emission evaluation within 90 days of initial flaring event using Method 9 for 18 minutes to obtain 72 individual 15-second readings.	*Requirement not triggered.* ***EU ID 34*** *has never been used.*			X
16	102.2	Recordkeeping for Flare VEOs	29-34	Flares	For each observed flare event, record: 1) the flare emission unit ID number; 2) results of the Method 9 observations; 3) reason(s) for flaring; 4) date, beginning and ending time of event; and 5) cumulative volume of gas flared.	*Recordkeeping* *No flare events observed during the certification period.*			X
16	102.3	Reporting for Flare VEOs	29-34	Flares	Until six flare events have been monitored, each qualifying flare event must be monitored or an explanation of the reason the event was not monitored must be included with the next Operating Report.	*Recordkeeping/ Operating Reports.* *Six flare events have been observed as required by the permit.*			X
16	102.4	Reporting for Flare VEOs	29-34	Flares	If applicable, attach a copy of the records required by Condition 102.2 with the Operating Report.	*Recordkeeping/ Operating Reports.* *No flare events observed during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
16	102.5	Reporting for Flare VEOs	29-34	Flares	Submit an excess emissions report if observation of the flares under Conditions 102 and 102.1 results in an opacity >20 % for 3 minutes in any hour or any 6 consecutive minutes.	*Recordkeeping* *No excess emissions during the certification period.*			X

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 2
Kuparuk CPF 2

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through December 31, 2018

Air Quality Operating Permit No. 273TVP01

ConocoPhillips Alaska, Inc.

Kuparuk Central Production Facility #2

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 Mar 2019
Date

Notary

3/29/2019
Date

SHERRY BILLINGS
NOTARY PUBLIC
STATE OF ALASKA

ED_004016I_00012166-00051

Title V Compliance Certification Report - Central Production Facility #2 - ConocoPhillips Alaska, Inc.
Permit No. 273TVP01 - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
4	1, 2	Assessable Emissions	All	NA	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to ADEC by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		
5	~~3a & 3b~~	Visible Emissions	1-47	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed ~~20% for more than 3 minutes in any 1 hour or more than~~ 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 10-12, 33-47:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 7, and 13:*** *burned only gas* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(Dual fuel-fired EU ID 14 is no longer in service.)*** ***Liquid fuel-fired EU IDs 15-29:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 30-31*** *: reasonable inquiry* ***Flare EU ID 32:*** *On 6/29/2018 EU ID 32 exceeded the SIP visible emissions standard. An EE report was submitted on 6/30/2018.*		X	
5	3.1 & 4.1	Visible Emissions	1-3, 10-12, 33-47	Gas-Fired Equipment	Monitoring for these emission units shall consist of an annual certification that each of these emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 1-3, 10-12, 33-47:*** *burned only gas.*	X		
5	3.2	Visible Emissions	15-29	Diesel-Fired Equipment	If these emission units did not exceed operating time thresholds in Condition 3.3, monitoring shall consist of an annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***EU IDs 15 & 16:*** *operated 140 hours or less* ***EU IDs 17 - 29:*** *operated 400 hours or less.* *Compliance with visible emissions standard assessed based on reasonable inquiry.*	X		
5	3.3	Visible Emissions	15-16	Diesel-Fired Equipment	If these emission units operated more than 140 hours in one calendar year, monitor, record, and report in accordance with Conditions 68 & 69.	*Recordkeeping/Operating Reports* ***EU IDs 15 & 16*** *: operated 140 hours or less*			X
5	3.3	Visible Emissions	17-29	Diesel-Fired Equipment	If these emission units operated more than 400 hours in one calendar year, monitor, record, and report in accordance with Conditions 68 & 69.	*Recordkeeping/Operating Reports* ***EU IDs 17 - 29:*** *operated 400 hours or less.*			X

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							Continuous	Intermittent	Not Triggered
5	3.4	Visible Emissions	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated only on gas, monitoring shall consist of an annual certification that the emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)***	X		
5	3.4	Visible Emissions	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Conditions 68 & 69.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)***			X
5	3.4	Visible Emissions	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)*** *Compliance with visible emissions standard assessed based on reasonable inquiry.*			X
5	3.5	Visible Emissions	30-32	Flares	Monitor, record, and report in accordance with Condition 71.	*Recordkeeping/ Operating Reports*	X		
5	4	Particulate Matter	1-47	Fuel-Fired Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust gas corrected to standard conditions and averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 10-12, 33-47:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 7, and 13:*** *burned only gas* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(Dual fuel-fired EU ID 14 is no longer in service.)*** ***Liquid fuel-fired EU IDs 15-29:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 30-32:*** *reasonable inquiry*	X		

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							Continuous	Intermittent	Not Triggered
5	4.2	Particulate Matter	15-29	Diesel-Fired Equipment	If these emission units did not exceed operating time thresholds in Condition 4.3, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU IDs 15 & 16:*** *operated 140 hours or less* ***EU IDs 17 - 29:*** *operated 400 hours or less.* *Compliance with PM standard assessed based on reasonable inquiry.*	X		
5	4.3	Particulate Matter	15-16	Diesel-Fired Equipment	If these emission units operated more than 140 hours in one calendar year, monitor, record, and report PM emissions in accordance with Condition 70.	*Recordkeeping/Operating Reports* ***EU IDs 15 & 16:*** *operated 140 hours or less*			X
5	4.3	Particulate Matter	17-29	Diesel-Fired Equipment	If these emission units operated more than 400 hours in one calendar year, monitor, record, and report PM emissions in accordance with Condition 70.	*Recordkeeping/Operating Reports* ***EU IDs 17 - 29:*** *operated 400 hours or less.*			X
5	4.4	Particulate Matter	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated only on gas, monitoring shall consist of an annual certification that the emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)***	X		
5	4.4	Particulate Matter	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Condition 70.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)***			X

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							Continuous	Intermittent	Not Triggered
5	4.4	Particulate Matter	4-9, 13-14	Dual Fuel-Fired Equipment	If these emission units operated on liquid fuel for 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU IDs 4, 7, and 13:*** *burned only gas.* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel.)*** ***(EU ID 14 is no longer in service.)*** *Compliance with PM standard assessed based on reasonable inquiry.*			X
5	4.5	Particulate Matter	30-32	Flares	Certify these emission units were in compliance with the PM standard.	*Reasonable Inquiry*	X		
5	5	Sulfur Compound Emissions	1-47	Fuel-Fired Equipment	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO_2 material balance*	X		
5	5.1	Sulfur Compound Emissions	4-9, 13-14, 15-29	Diesel-Fired Equipment	Obtain monthly fuel sulfur analysis results from Topping Plant.	*Recordkeeping*	X		
5	5.1a	Sulfur Compound Emissions - for Diesel Fuel	4-9, 13-14, 15-29	Diesel-Fired Equipment	Include a list of sulfur content measured for each month in the Operating Report.	*Operating Reports.*	X		
5	5.1b	Sulfur Compound Emissions - for Diesel Fuel	4-9, 13-14, 15-29	Diesel-Fired Equipment	Submit an excess emissions report if sulfur content for any month exceeds 0.75%.	*Recordkeeping* *Notification to ADEC was not required*			X
5	5.2a	Sulfur Compound Emissions - for Fuel Gas	1-14, 33-47	Gas-Fired Equipment	Determine sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*ASTM D4810-06 and Operating Reports*	X		
5	5.2b & 5.2d	Sulfur Compound Emissions - for Fuel Gas	1-14, 33-47	Gas-Fired Equipment	Records of analyses conducted shall be kept and copies shall be included with Operating Report.	*Recordkeeping/ Operating Reports.*	X		
5	5.2c	Sulfur Compound Emissions	1-14, 33-47	Gas-Fired Equipment	Submit an excess emissions report if sulfur compound emissions, expressed as SO2, from any emission unit exceeds 500 ppm averaged over 3 hours.	*Recordkeeping and SO_2 material balance* *No excess emissions reporting required*			X

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							Continuous	Intermittent	Not Triggered
5	6	Turbine BACT Emission Limits	1-13	Turbines	Actual emissions from these turbines shall be limited as indicated in Table 2 of Air Quality Operating Permit No. 273TVP01.	*Source test data, recordkeeping, routine maintenance and good operational procedures*	X		
5	6.1	Turbine BACT Emission Limits	1-13	Turbines	Use emission factors in Section 16 of permit No. 273TVP01 and hours of operation and/or amount of fuel used to calculate monthly and 12-month consecutive summation of emissions for NO_x, SO_2, CO, PM, and VOC.	*Recordkeeping*	X		
5	6.2	Turbine BACT Emission Limits	1-13	Turbines	Report monthly and consecutive 12-month period summation of NOx, SO2, CO, PM, and VOC emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
5	6.3	Turbine BACT Emission Limits	1-13	Turbines	Submit an excess emissions report if consecutive 12-month summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period*			X
5	6.4	Turbine BACT Emission Limits	1-13	Turbines	Monitor, record, and report in accordance with Condition 23 to demonstrate compliance with short-term BACT NO_x emission limits listed in Table 2 of Air Quality Operating Permit No. 273TVP01.	*Source test data and approved substitution of source test data.*	X		
5	7	Broach and Drill Site Heater BACT Emission Limits	14, 33-47	Heaters	Actual emissions from these heaters shall be limited as indicated in Table 3 of Air Quality Operating Permit No. 273TVP01.	*Source test data, routine maintenance, recordkeeping, and good operational procedures*	X		
5	7.1	Broach and Drill Site Heater BACT Emission Limits	14, 33-47	Heaters	Use emission factors in Section 16 of Operating Permit No. 273TVP01 and hours of operation and/or fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, and PM.	*Recordkeeping*	X		
5	7.2	Broach and Drill Site Heater BACT Emission Limits	14, 33-47	Heaters	Report monthly and consecutive 12-month period summation of NO_x, SO_2, CO, and PM emissions, for each month of reporting period, with the Operating Report.	*Operating Reports*	X		
5	7.3	Broach and Drill Site Heater BACT Emission Limits	14, 33-47	Heaters	Submit an excess emissions report if consecutive 12-month summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period*			X

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							Continuous	Intermittent	Not Triggered
5	8	Visible Emissions	1-13	Turbines	Visible emissions (excluding water vapor) must not reduce visibility through the exhaust effluent by greater than 10% averaged over any 6 consecutive minutes in any one hour.	*Recordkeeping/ Reasonable Inquiry*	X		
5	8.1	Visible Emissions	1-13	Turbines	Monitoring shall consist of an annual certification that units 1 through 13 burned only gas.	*Recordkeeping* ***EU IDs 1-13:*** *burned only gas.*	X		
5	9	Fuel Consumption Monitoring	1-47	Fuel-Fired Equipment	Maintain and operate fuel gas meters or provide other means of estimating fuel consumption to determine the total volume of fuel gas consumed by emission units 1-13 and 14. Fuel consumption may be estimated for emission units 15-47.	*Recordkeeping*	X		
5	9.1	Fuel Consumption Monitoring	1-47	Fuel-Fired Equipment	Monitor and record the monthly fuel consumption for turbines (emission units 1-13 combined), emergency and drill site heaters (emission unit 14 and emission units 33 - 47 combined), diesel-fired equipment (emission units 15 - 29 combined), and flares (emission units 30 - 32).	*Recordkeeping*	X		
5	9.2	Fuel Consumption Monitoring	1-47	Fuel-Fired Equipment	Report monthly fuel consumption for each emission unit group (turbines, emergency heater/drillsite heaters, engines, flares), and the stationary source total fuel consumption for each month covered by the reporting period using the Operating Report.	*Operating Reports*	X		
5	10.1 & 10.2	Hours of Operation Monitoring	1-29, 33-47	Fuel-Fired Equipment	Monitor and record the monthly operating time for each of these emission units, and report in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	11	Fuel Gas Sulfur Content Limit	1-14, 30-47	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions, annual average.	*Recordkeeping/ Operating Reports*	X		
5	11.1	Fuel Gas Sulfur Content Limit	1-14, 30-47	Gas-Fired Equipment	Monitor compliance monthly by determining sulfur content of fuel gas using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*ASTM D4810 and Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
5	11.2	Fuel Gas Sulfur Content Limit	1-14, 30-47	Gas-Fired Equipment	Report the consecutive 12-month average fuel gas H_2S concentration, for each month of the reporting period, with each Operating Report.	*Operating Reports*	X		
5	11.3	Fuel Gas Sulfur Content Limit	1-14, 30-47	Gas-Fired Equipment	Submit an excess emissions report if the 12-month period average fuel gas H_2S concentration exceeds 200 ppmv.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
5	12, 12.1, 12.2	Operating Hours for Emergency Equipment	15-29	Diesel-Fired Equipment	Monitor and record monthly hours of emergency and non-emergency operation and consecutive 12-month period summation for each emission unit and report in the Operating Report. Emergency equipment must not be operated more than **200 hours each per consecutive 12-month period (non-emergency use)**.	*Recordkeeping/ Operating Reports*	X		
5	12.3	Operating Hours for Emergency Equipment	15-29	Diesel-Fired Equipment	Submit an excess emissions report if the consecutive 12-month total hours of non-emergency operation for any given month exceed **200 hours**.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
5	13	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-13, 48, 52-57, 59-61, 65-69, 71	NSPS emission units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units; any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative. **[This requirement no longer applies to EU IDs 52 and 53 effective 1/19/18.]**	*Recordkeeping*	X		
5	14	NSPS Subpart A - Good Air Pollution Control Practice	1-13, 48, 52-57, 59-61, 65-69, 71	NSPS emission units	These emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions. **[This requirement no longer applies to EU IDs 52 and 53 effective 1/19/18.]**	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	15	NSPS Subpart A - Concealment of Emissions	1-13, 52, 53, 71	NSPS emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 18, 21, 22, and 24. **[This requirement no longer applies to EU IDs 52 and 53 effective 1/19/18.]**	*Recordkeeping*	X		
5	16	NSPS Subpart A - Credible Evidence	1-13, 48, 52-57, 59-61, 65-69, 71	NSPS emission units	Nothing in this permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. **[This requirement no longer applies to EU IDs 52 and 53 effective 1/19/18.]**	*N/A - Advisory Condition*	X		
5	17	NSPS Subpart Ka - Requirements	48, 55-57, 59-61, 65, 67-69	Tanks	Do not store a petroleum liquid with a true vapor pressure greater than 1.0 psia in these emission units.	*Recordkeeping/ parameter data*	X		
5	18	NSPS Subpart Ka - VOC Standard	71	Tank	This emission unit must be equipped with a vapor recovery system which collects all VOC vapors and gases discharged from the storage vessel, and a vapor return or disposal system which is designed to process such VOC vapors and gases so as to reduce their emissions to the atmosphere by at least 95% by weight.	*Recordkeeping*	X		
5	19	NSPS Subpart Kb - Requirements (recordkeeping only)	49-51, 58, 62-64, 70	Tanks	Keep readily accessible records for the life of the tanks showing the dimensions and an analysis showing the capacity of the storage vessels. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	20.1	NSPS Subpart Kb - Requirements	54, 66	Methanol Tanks	Maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure (TVP) of the VOL, based on the maximum storage temperature recorded during the respective storage period.	*Recordkeeping/ parameter data*	X		

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							Continuous	Intermittent	Not Triggered
5	20.2	NSPS Subpart Kb - Requirements	54, 66	Methanol Tanks	Determine the maximum TVP using the procedures in 40 CFR 60.116b(e). May determine maximum monthly average ambient temperature using local data if National Weather Service data is not available for Kuparuk.	*Recordkeeping/ parameter data*	X		
5	20.3	NSPS Subpart Kb - Requirements	54, 66	Methanol Tanks	Keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the storage vessel.	*Recordkeeping*	X		
5	20.4	NSPS Subpart Kb - Requirements	54, 66	Methanol Tanks	Notify Administrator within 30 days when the maximum TVP of the liquid is equal to or greater than 5.2 kPa (0.75 psia).	*Recordkeeping* *Notification not required*			X
5	21	NSPS Subpart Kb - VOC Standard	52, 53	Divert Tanks	Equip these emission units with a closed vent system and control device. The closed vent system must be designed to collect all VOC vapors and gases discharged from each storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as determined by Method 21. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	21.1, 21.3	NSPS Subpart Kb - VOC Standard	52, 53	Divert Tanks	Operate, monitor, and record parameters of the closed vent system in accordance with the tank O&M plan. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping/ Tank O&M plan*	X		
5	21.2	NSPS Subpart Kb - VOC Standard	52, 53	Divert Tanks	Maintain a copy of the O&M plan on file. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping/ Tank O&M plan*	X		
5	21.4	NSPS Subpart Kb - VOC Standard	52, 53	Divert Tanks	Keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the storage vessel. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	22.1	NSPS Subpart GG - NO_X Standard	1-3	Turbines	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 161 ppmvd.	*Recordkeeping/ Source test results*	X		

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							Continuous	Intermittent	Not Triggered
5	22.2	NSPS Subpart GG - NO_X Standard	10-13	Turbines	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 162 ppmvd. (Note: emission unit 13 is exempt from this standard when firing on liquid fuel in accordance with 40 CFR 60.332(k).)	*Recordkeeping/ Source test results*	X		
5	23.1	NO_X MR&R - WAIVERS	1-3, 10-13	Turbines	Upon request, furnish ADEC with a written copy of any EPA granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
5	23.1	NO_X MR&R - WAIVERS	1-3, 10-13	Turbines	A copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule must be kept on file.	*Recordkeeping*	X		
5	23.2a	NO_X MR&R - PERIODIC TESTING	1-3, 10-13	Turbines	If these emission units operate 400 hours or more in any 12-month period during the life of this permit, then Condition 23.2a(i) or 23.2a(ii) must be satisfied.	*Source test data and substitution of source test data.*	X		
5	23.2a(i)	NO_X MR&R - PERIODIC TESTING	1-3, 10-13	Turbines	For existing turbines not represented by emission data described in Condition 23.2a(ii), a NO_x and O_2 source test must be conducted under 40 CFR 60, Appendix A-7, Method 20 by November 2005 A) for each turbine, or B) on one turbine to represent a group of turbines, if allowed to do so under Condition 23.3.	*Source test data and substitution of source test data.*	X		
5	23.2a(ii)	NO_X MR&R - TESTING	1-3, 10-13	Turbines	If condition 23.2a(i) is not satisfied, then if a test following 40 CFR 60, Appendix A-7, Method 20 or following another protocol approved by ADEC was conducted on a turbine between November 2000 and November 2002 (within two years before the issuance date of this permit), and the test shows that emissions at a maximum load are less than 90% of the NSPS emission limit in Condition 22, then the permittee may use the results to demonstrate compliance with the limits, but additional testing is required by November 2007.	*CPAI did not rely on this condition to demonstrate compliance.*			X

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							Continuous	Intermittent	Not Triggered
5	23.2b	NO_X MR&R - TESTING	1-3, 10-13	Turbines	If test results for one turbine are 90% or more of the NSPS emission limit at maximum load, a Method 20 test shall be conducted within one year of the test. At least one additional test is required until at least 2 consecutive tests show emissions less than 90% of limit at loads up to maximum.	*Source test data and substitution of source test data.*			X
5	23.3	NO_X MR&R - SUBSTITUTING TEST DATA	1-3, 10-13	Turbines	CPAI may use a Method 20 test on only one of the turbines to satisfy the testing requirement if the test is representative of the group and the results are less than 90% of the NSPS limit.	*Source test data and substitution of source test data.*	X		
5	23.4	NO_X MR&R - LOAD	1-3, 10-13	Turbines	Tests shall be in accordance with 40 CFR 60.335(c)(3) or other approved method. Testing shall occur when the turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Source test data and substitution of source test data.*			X
5	23.5a	NO_X MR&R - RECORD KEEPING	1-3, 10-13	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load and method for calculating load from the measurements.	*Source test data and substitution of source test data.*			X
5	23.5b	NO_X MR&R - RECORD KEEPING	1-3, 10-13	Turbines	For turbines that operate less than 400 hours, keep monthly records of the hours of operation. If a turbine which normally operates less than 400 hours, exceeds that total during any 12 month period, test according to Condition 23.2, or if it is no longer possible to meet the schedule stated in Condition 23.2, test within one year of exceeding 400 hours of operation in 12 consecutive months.	*Recordkeeping/ Operating Reports*			X
5	23.6a	NO_X MR&R - REPORTING	1-3, 10-13	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine identification, highest load recorded during the period covered by the operating report.	*Recordkeeping/ Reporting not required during certification period.*			X

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							Continuous	Intermittent	Not Triggered
5	23.6b	NO_X MR&R - REPORTING	1-3, 10-13	Turbines	For turbines that have not been tested because they normally operate less than 400 hours in any 12 months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
5	23.6c	NOX MR&R - REPORTING	1-3, 10-13	Turbines	Submit an excess emissions report if: a test result exceeds the emission standard, Method 20 testing is required by Condition 23.2 or 23.5b but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedance of emission limits in Conditions 6 or 22.	*Recordkeeping/ Operating Reports/ Source test results* *Reporting not required during the certification period.*			X
5	24, 24.1a	NSPS Subpart GG - SO_2 Standard	1-13	Turbines	Do not allow the sulfur content of the fuel gas or liquid fuel burned in these emission units to exceed 0.8 percent by weight. Determine the sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*ASTM Method D 4810.* *Documentation was recorded in Operating Reports.*	X		
5	24, 24.1b	NSPS Subpart GG - SO_2 Standard	4-9, 13	Turbines	Do not allow the sulfur content of the fuel gas or liquid fuel burned in these emission units to exceed 0.8 percent by weight. Determine the sulfur content of liquid fuel monthly using one of the methods outlined in ASTM D 2880-71, or an EPA approved alternative method.	*ASTM Method D 2622.* *Documentation was recorded in Operating Reports.*	X		
5	24.2	NSPS Subpart GG - SO_2 Standard	1-13	Turbines	Fuel sulfur analysis 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.	*Recordkeeping*	X		
5	24.3, 24.4	NSPS Subpart GG - SO_2 Standard	1-13	Turbines	Keep records of monthly fuel gas and liquid fuel sulfur analyses. Submit a summary of monthly fuel gas and liquid fuel sulfur analytical results with each Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	24.5	NSPS Subpart GG - SO_2 Standard	1-13	Turbines	Annually report the results of monthly fuel gas and liquid fuel sulfur analyses to EPA.	*Recordkeeping* *Report submitted to EPA in a timely manner*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
6	25	NESHAP Applicability	All	NA	Determine applicability for the stationary source under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement.	*Used EPA and GRI HAPs emission factors to calculate HAPs and prepare applicability determinations.*	X		
6	25.1	NESHAP Applicability	All	NA	Keep a record of NESHAPs applicability determination. Maintain records for 5 years or until emission unit changes operation and becomes affected emission unit.	*Recordkeeping*	X		
6	26.1	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(b): -No person testing, maintaining, servicing, repairing or disposing of halon-containing equipment or using such equipment for technician training may knowingly vent or otherwise release into the environment any halons used in such equipment, except: -Minimal release associated with good faith attempts to recycle or recover halon -Release of residual halon contained in fully discharged total flooding fire extinguishing systems -Release of halons during testing -Emergency release of halons for the legitimate purpose of fire extinguishing, explosion inertion or other emergency application for which the equipment or systems were designed.	*Recordkeeping* *Technician certification and training.*	X		
6	26.2	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(c): Technicians who test, maintain, service, repair or dispose of halon-containing equipment shall be trained regarding halon emissions reduction within 30 days of hiring.	*Recordkeeping* *Technician certification and training.*	X		
6	26.3	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(d): Do not dispose of halon-containing equipment.	*Recordkeeping* *Technician certification and training.*	X		
6	26.4	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(e): Do not dispose of halon.	*Recordkeeping* *Technician certification and training.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
6	26.5	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(f): No owner of halon-containing equipment shall allow halon release to occur as a result of failure to maintain such equipment.	*Recordkeeping* *Technician certification and training.*	X		
6	27.1	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(b): Do not use a substitute for an ozone depleting compound known to be manufactured, processed, or imported in violation of 40 CFR 82 Subpart G or any use restrictions in the acceptability determination.	*Recordkeeping*	X		
6	27.2	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(c): Do not use a substitute without adhering to any use restrictions set by acceptability determination.	*Recordkeeping*	X		
6	27.3	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(d): Do not use a substitute after effective date of any rule-making adding such substitutes to list of unacceptable substitutes.	*Recordkeeping*	X		
7	28.3	Insignificant Emission Units with Actual Emissions > IEU Thresholds	IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Reasonable Inquiry* *No reporting required*			X
7	29, 29.1, 29.2	Visible Emissions for IEUs	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) must not exceed 20% for more than 3 minutes in any 1 hour or more than 20% averaged over any 6 consecutive minutes.	*Monitoring not required. Reasonable inquiry.*	X		
7	30	PM Standard for IEUs	IEUs	Insignificant Emission Units	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Monitoring not required. Reasonable inquiry.*	X		
7	31	Sulfur Compound Emissions for IEUs	IEUs	Insignificant Emission Units	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over three hours.	*Monitoring not required. Reasonable inquiry.*	X		
8	32	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	32	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
8	32	Asbestos NESHAP	All	NA	Keep records in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
8	32	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61 Subpart A and Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X
8	33	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.154: No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
8	33	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.156: All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping* *Contractor certification and training.*	X		
8	33	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.161: Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
8	33	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.162: All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		
8	33	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and record keeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
8	34.1a	Good Air Pollution Control	14-47 49-51 58 62-64 70	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures. **[This requirement no longer applies to EU IDs 49-51, 58, 62-64, and 70 effective 1/19/18.]**	*Recordkeeping*	X		
8	34.1b	Good Air Pollution Control	14-47 49-51 58 62-64 70	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions. **[This requirement no longer applies to EU IDs 49-51, 58, 62-64, and 70 effective 1/19/18.]**	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	34.1c	Good Air Pollution Control	14-47 49-51 58 62-64 70	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures. **[This requirement no longer applies to EU IDs 49-51, 58, 62-64, and 70 effective 1/19/18.]**	*Recordkeeping*	X		
8	35	Open Burning	All	NA	Conduct any open burning in accordance with 18 AAC 50.065.	*No open burning during the certification period. Monitoring not required.*			X
8	36	Fugitive Emissions	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable Inquiry*	X		
8	37	Dilution	1-47	NA	Do not dilute emissions to comply with permit.	*Reasonable Inquiry*	X		
8	38	Stack Injection	1-47	NA	Do 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 unless approved in writing by ADEC.	*Reasonable Inquiry*	X		
8	39, 28.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Reasonable Inquiry*	X		
8	39.1	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety by completing an excess emissions report.	*Recordkeeping* *No known emissions that present a threat to human health or safety during the certification period.*			X
8	39.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 39.	*Recordkeeping* *No known complaints during the certification period.*			X
8	39.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if ADEC notifies CPAI that it has found a violation of Condition 39.	*Recordkeeping* *No known complaints during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	39.4	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping* *No known complaints during the certification period as documented in the Operating Reports..*			X
8	39.5	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Include a brief summary report with the Operating Report which contains: -the number of complaints received -number of times CPAI or ADEC found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports* *No known complaints during the certification period as documented in the Operating Reports..*			X
8	39.6	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Notify ADEC of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *CPAI did not receive any complaints.*			X
8	40	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard.	*Recordkeeping* *No emissions in excess of a technology based emissions standard were noted during the certification period.*			X
8	40	Technology Based Emission Standard	All	NA	Give ADEC written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered.	*Recordkeeping* *No emissions in excess of a technology based emissions standard were noted during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	41	Permit Renewal	All	NA	Submit an application to renew Title V permit 6 to 18 months before expiration of current Title V permit. (No sooner than June 26, 2006 and no later than June 25, 2007)	*Recordkeeping* *Permit renewal application was submitted on June 25, 2007.*	X		
9	42	ADEC Requested Source Tests	All	NA	Conduct source testing as requested by ADEC.	*Recordkeeping* *ADEC did not request source tests during the certification period.*			X
9	43-51	General Source Testing Requirements	All	NA	Comply with the provisions of Section 9 when source tests are conducted.	*Recordkeeping* *No source tests were conducted during the certification period.*			X
10	28.1, 52	Certification	All	All emission units, including insignificant emission units	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		
10	52	Certification	All	NA	Notarize official's signature for this report.	*Recordkeeping*	X		
10	53	Submittals	All	NA	Send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping*	X		
10	54	Information Requests	All	NA	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
10	55	Record keeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
10	56.1a	Excess Emission and Permit Deviation Reports	All	NA	Report emissions that present a potential threat to human health or safety and excess emissions that CPAI believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *Excess emissions/ Permit deviation reports* *Operating Reports*	X		
10	56.1b	Excess Emission and Permit Deviation Reports	All	NA	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *Excess emissions/ Permit deviation reports* *Operating Reports* *No EE reports in this classification were required during the certification period.*			X
10	56.1c(i)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations not described in conditions 56.1a, 56.1b, and 56.1c(ii) within 30 days of end of month in which the emissions or deviation occurred or were discovered.	*Recordkeeping* *Excess emissions/ Permit deviation reports* *Operating Reports*	X		
10	56.1c(ii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping* *No EE or PD reports in this classification were required during the certification period.*			X
10	56.2	Excess Emission Reports	All	NA	Report excess emissions using ADEC's online form or form in Section 17 of Operating Permit No. 273TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Excess emissions reports* *Operating Reports*	X		
10	56.3	Permit Deviation Reports	All	NA	Report permit deviations using the form in Section 17 of Operating Permit No. 273TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Permit deviation reports* *Operating Reports* *No PD reports were required during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
10	56.4	Excess Emission and Permit Deviation Reports	All	NA	Provide more detailed written report when requested by ADEC.	*Recordkeeping* *ADEC did not request any additional information pertaining to EE or PD reporting during the certification period.*			X
10	57.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs reports submitted to EPA as required by Condition 23 (waivers) and Condition 32 (Asbestos NESHAP) with the Operating Report unless copies have already been provided to ADEC at time of submittal.	*Recordkeeping*	X		
10	57.2	NSPS and NESHAP Reports	All	NA	Provide ADEC a written copy of any EPA granted waivers of federal emission standards, recordkeeping, monitoring, performance testing, reporting requirements or custom monitoring schedules upon request by ADEC.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
10	58	Operating Report	All	NA	Submit an original and 2 copies of a quarterly Operating Report by April 30 for January 1 to March 31, by July 30 for April 1 to June 30, by October 30 for July 1 to September 30 and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
10	58.1	Operating Report	All	NA	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports*	X		
10	58.2a	Operating Report	All	NA	If excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify: -date of deviation -equipment involved -permit condition affected -description of excess emissions or permit deviations -any corrective action or preventative measures taken and dates of such actions.	*Recordkeeping/ Operating Reports*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
10	58.2b	Operating Report	All	NA	When excess emissions or permit deviations during the reporting period have already been reported, cite the date(s) of those report(s) in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
10	59	Annual Compliance Certification	All	NA	- Submit an original and two copies of the annual compliance certification report for the prior year by March 31. - Submit a copy of the annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping* *The annual compliance certification was sent to ADEC and EPA by March 31.*	X		
13	68, 68.1	Visible Emissions Monitoring	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	If required by condition 3.3 or 3.4, perform a Method 9 visible emissions observation for affected emission units. Conduct the observation within 90 days after triggering this condition.	*Recordkeeping / Operating Reports* ***EU IDs 4, 7 and 13:*** *did not operate on liquid fuel* ***(EU IDs 5, 6, 8, 9 are no longer capable of burning liquid fuel)*** ***(EU ID 14 is no longer in service)*** ***EU IDs 15 & 16:*** *operated 140 hours or less* ***EU IDs 17 - 29:*** *operated 400 hours or less*			X
13	68.1	Visible Emissions Monitoring	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping* *No Method 9 observations required*			X
13	68.2	Visible Emissions Reporting	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Include with each Operating Report the results of all Method 9 readings conducted during the reporting period for EU IDs 4 - 9 and 13 - 29.	*Recordkeeping/ Operating Reports* *No Method 9 observations required*			X
13	69	Corrective Actions Resulting from VEOs	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Perform corrective actions within 14 days if 18 consecutive minutes of Method 9 observations result in an 18 minute average opacity >20 percent and conduct a follow-up Method 9 observation in accordance with Condition 68.1 within 30 days of completing the corrective action.	*Recordkeeping* *No corrective action required*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	69.1	Record keeping for Corrective Actions	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Keep written records of the starting date, completion date, and a description of any actions taken to reduce visible emissions.	*Recordkeeping* *No corrective action required*			X
13	69.2	Reporting of Corrective Actions	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Include copies of records required by Condition 69.1 with each Operating Report.	*Recordkeeping* *No corrective action required*			X
13	70, 70.1	PM Monitoring	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Conduct a PM source test no later than 180 days after the first follow-up Method 9 observation performed under Conditions 68.1 and 69 results in an 18-minute average opacity >20 percent. (This requirement is waived for an individual emission unit if a PM source test on the unit has shown compliance with the PM standard since permit issuance or if a follow-up VEO conducted using Method 9 during the 180 days shows that an 18-minute average opacity is < or = 20 percent.)	*Recordkeeping* *PM source test not required*			X
13	70.2a	PM Reporting	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	During each PM source test, perform an 18-minute visible emission observation to obtain 72 individual 15-second readings, and submit a summary of the results to ADEC with the PM source test report. Submit the source test report in accordance with Condition 50.	*Recordkeeping* *PM source test not required*			X
13	70.2b	PM Reporting	4-9, 13, 14, 15, 16, 17-29	Diesel-Fired Equipment	Submit an excess emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*Recordkeeping* *PM source test not required*			X
13	71, 71.1	Visible Emissions Monitoring for Flares	30-32	Flares	Monitor the first six scheduled daylight flare events during the life of the permit using Method 9 for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping/ Operating Reports* *A total of six (6) scheduled daylight flare events have been monitored at CPF-2 during the permit term. Method 9 observation reports were completed for each event.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	71.2	Recordkeeping for Flare VEOs	30-32	Flares	For each observed flare event, record: 1) the flare emission unit ID number 2) results of the Method 9 observations 3) reason(s) for flaring 4) date, beginning and ending time of event 5) cumulative volume of gas flared.	*Recordkeeping/ Operating Reports*			X
13	71.3	Reporting for Flare VEOs	30-32	Flares	Until six flare events have been monitored, each qualifying flare event must be monitored or an explanation of the reason the event was not monitored must be included with the next Operating Report.	*Recordkeeping/ Operating Reports*			X
13	71.4	Reporting for Flare VEOs	30-32	Flares	If applicable, attach a copy of the records required by Condition 71.2 with the Operating Report.	*Recordkeeping/ Operating Reports*			X
13	71.5	Reporting for Flare VEOs	30-32	Flares	Submit an excess emissions report if observation of the flares under Conditions 71 and 71.1 results in an opacity >20% for any 6 consecutive minutes.	*Recordkeeping* *No excess emissions reporting required during the certification period.*			X

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 3
Kuparuk CPF 3

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through December 31, 2018

Air Quality Operating Permit No. 171TVP01, Revision 1

ConocoPhillips Alaska, Inc.

Kuparuk Central Production Facility #3

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

Notary

3/29/2019
Date

SHERRY BILLINGS
NOTARY PUBLIC
STATE OF ALASKA

ED_004016I_00012166-00076

Title V Compliance Certification Report - Central Production Facility #3 - ConocoPhillips Alaska, Inc.
Permit No. 171TVP01, Revision 1 for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
4	1, 2	Assessable Emissions	All	NA	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to ADEC by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		
5	~~3a &~~ 3b	Visible Emissions	1-27	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed ~~20% for more than 3 minutes in any 1 hour or more than~~ 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-6, 8, & 15-27:*** *burned only gas* ***Dual fuel-fired EU ID 7:*** *did not operate* ***Liquid fuel-fired EU ID 9:*** *monitoring not required; reasonable inquiry* ***(Liquid fuel-fired EU ID 10 is no longer in service.)*** ***Flare EU IDs 11-14:*** *reasonable inquiry. All required flare event observations have been completed.*	X		
5	3.1 & 4.1	Visible Emissions	1-6, 8, 15-27	Gas-Fired Equipment	Monitoring for these emission units shall consist of annual certification that each of these emission units fired only gas.	*Recordkeeping/ Operating Reports* ***EU IDs 1-6, 8, and 15-27*** *burned only gas during the certification period.*	X		
5	3.2	Visible Emissions	7	Dual Fuel-Fired Heater	If this emission unit operated only on gas, monitoring shall consist of annual certification that the emission unit fired only gas.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.*			X
5	3.2	Visible Emissions	7	Dual Fuel-Fired Heater	If this emission unit operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Conditions 70 & 71.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.*			X
5	3.2	Visible Emissions	7	Dual Fuel-Fired Heater	If this emission unit operated on liquid fuel for 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.* *Compliance with the visible emissions standard assessed based on reasonable inquiry.*	X		

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							Continuous	Intermittent	Not Triggered
5	3.3	Visible Emissions	9-10	Diesel-Fired Equipment	If these emission units did not exceed operating time thresholds in Condition 3.4, monitoring shall consist of annual certification of compliance with opacity standard.	*Recordkeeping/ Operating Reports* ***EU ID 9*** *operated less than 275 hours during the certification period.* ***(EU ID 10 is no longer in service)*** *Compliance with the visible emissions standard assessed based on reasonable inquiry.*	X		
5	3.4	Visible Emissions	9-10	Diesel-Fired Equipment	If Emission Unit 9 operated more than 275 hours in one calendar year and/or Emission Unit 10 operated more than 440 hours in one calendar year, monitor, record, and report in accordance with Conditions 70 & 71.	*Recordkeeping/ Operating Reports* ***EU ID 9*** *operated less than 275 hours during the certification period.* ***(EU ID 10 is no longer in service)***			X
5	3.5	Visible Emissions	11-14	Flares	Monitor, record, and report in accordance with Condition 73.	*Recordkeeping/ Operating Reports*	X		
5	4	Particulate Matter	1-27	Fuel-Fired Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust gas corrected to standard conditions and averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-6, 8, & 15-27:*** *burned only gas* ***Dual fuel-fired EU ID 7:*** *did not operate* ***Liquid fuel-fired EU ID 9:*** *monitoring not required; reasonable inquiry* ***(Liquid fuel-fired EU ID 10 is no longer in service.)*** ***Flare EU IDs 11-14:*** *reasonable inquiry.*	X		
5	4.2	Particulate Matter	7	Dual Fuel-Fired Emergency Heater	If this emission unit operated only on gas, monitoring shall consist of annual certification that this emission unit fired only gas.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.*			X

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5	4.2	Particulate Matter	7	Dual Fuel-Fired Emergency Heater	If this emission unit operated on liquid fuel for more than 400 hours in one calendar year, monitor, record, and report in accordance with Condition 72.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.*			X
5	4.2	Particulate Matter	7	Dual Fuel-Fired Emergency Heater	If this emission unit operated on liquid fuel for 400 hours or less in one calendar year, monitoring shall consist of an annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *did not operate during the certification period.* *Compliance with the visible emissions standard assessed based on reasonable inquiry.*	X		
5	4.3	Particulate Matter	9-10	Diesel-Fired Equipment	If these emission units did not exceed operating time thresholds in Condition 4.4, monitoring shall consist of annual certification of compliance with PM standard.	*Recordkeeping/ Operating Reports* ***EU ID 9*** *operated less than 275 hours during the certification period.* ***(EU ID 10 is no longer in service)*** *Compliance with the particulate matter standard assessed based on reasonable inquiry.*	X		
5	4.4	Particulate Matter	9-10	Diesel-Fired Equipment	If emission unit 9 operated more than 275 hours in one calendar year and/or emission unit 10 operated more than 440 hours in one calendar year, monitor, record, and report PM emissions in accordance with Condition 72.	*Recordkeeping/ Operating Reports* ***EU ID 9*** *operated less than 275 hours during the certification period.* ***(EU ID 10 is no longer in service)***			X
5	4.5	Particulate Matter	11-14	Flares	Certify these emission units were in compliance with the PM standard.	*Reasonable Inquiry*	X		
5	5	Sulfur Compound Emissions	1-27	Fuel-Fired Equipment	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO_2 material balance*	X		

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							Continuous	Intermittent	Not Triggered
5	5.1	Sulfur Compound Emissions - for Diesel Fuel	7, 9-10	Diesel-Fired Equipment	Obtain monthly fuel sulfur analysis results from Topping Plant.	*Recordkeeping*	X		
5	5.1a	Sulfur Compound Emissions - for Diesel Fuel	7, 9-10	Diesel-Fired Equipment	Include a list of sulfur content measured for each month in Operating Report.	*Operating Reports*	X		
5	5.1b	Sulfur Compound Emissions - for Diesel Fuel	7, 9-10	Diesel-Fired Equipment	Submit an excess emissions report if sulfur content for any month exceeds 0.75%.	*Recordkeeping* *Excess emissions reporting not required during the certification period.*			X
5	5.2a	Sulfur Compound Emissions - for Fuel Gas	1-8, 11-27	Gas-Fired Equipment	Determine sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*ASTM Method D 4810 and Operating Reports*	X		
5	5.2b & 5.2d	Sulfur Compound Emissions - for Fuel Gas	1-8, 11-27	Gas-Fired Equipment	Records of analyses conducted shall be kept and copies shall be included with Operating Report.	*Operating Reports*	X		
5	5.2c	Sulfur Compound Emissions	1-8, 11-27	Gas-Fired Equipment	Submit an excess emissions report if sulfur compound emissions, expressed as SO2, from any emission unit exceeds 500 ppm averaged over 3 hours.	*Recordkeeping and SO_2 material balance* *Excess emissions reporting not required during the certification period.*			X
5	6	Turbine BACT Emission Limits	1-5	Turbines	Actual emissions from these turbines shall be limited as indicated in Table 2 of Air Quality Operating Permit No. 171TVP01.	*Source test data, recordkeeping, routine maintenance, and good operational procedures*	X		
5	6.1	Turbine BACT Emission Limits	1-5	Turbines	Use emission factors in Section 16 of permit no. 171TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, PM, and VOC.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	6.2	Turbine BACT Emission Limits	1-5	Turbines	Report monthly and consecutive 12-month period summation of NOx, SO2, CO, PM, and VOC emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
5	6.3	Turbine BACT Emission Limits	1-5	Turbines	Submit an excess emissions report if consecutive 12-month summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping/ Operating Reports No excess emissions reporting required during the certification period.*			X
5	6.4	Turbine BACT Emission Limits	1-5	Turbines	Monitor, record, and report in accordance with Condition 24 to demonstrate compliance with short-term BACT NO_x emission limits in Table 2 of Operating Permit No. 171TVP01.	*Source test data and approved substitution of source test data.*	X		
5	7	Turbine BACT Emission Limits	6	GE Frame 5 Turbine	Actual emissions from this turbine shall be limited as indicated in Table 3 of Air Quality Operating Permit No. 171TVP01.	*Source test data, recordkeeping, routine maintenance, and good operational procedures.*	X		
5	7.1	Turbine BACT Emission Limits	6	GE Frame 5 Turbine	Use emission factors in Section 16 of Operating Permit No. 171TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, PM, and VOC.	*Recordkeeping*	X		
5	7.2	Turbine BACT Emission Limits	6	GE Frame 5 Turbine	Report monthly and consecutive 12-month period summation of NO_x, SO_2, CO, PM, and VOC emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
5	7.3	Turbine BACT Emission Limits	6	GE Frame 5 Turbine	Submit an excess emissions report if consecutive 12-month summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping/ Operating Reports No excess emissions reporting required during the certification period.*			X
5	7.4	Turbine BACT Emission Limits	6	GE Frame 5 Turbine	Monitor, record, and report in accordance with Condition 24 to demonstrate compliance with short-term BACT NO_x emission limit.	*Source test data and approved substitution of source test data.*	X		

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							Continuous	Intermittent	Not Triggered
5	8	Drill Site Heater BACT Emission Limits	15-27	Drillsite Heaters	Actual emissions from these heaters shall be limited as indicated in Table 4 of Operating Permit No. 171TVP01.	*Source test data, recordkeeping, and good operational procedures*	X		
5	8.1	Drill Site Heater BACT Emission Limits	15-27	Drillsite Heaters	Use emission factors in Section 16 of Operating Permit No. 171TVP01 and hours of operation and/or amount of fuel used to calculate monthly and consecutive 12-month summation of emissions for NO_x, SO_2, CO, and PM.	*Recordkeeping*	X		
5	8.2	Drill Site Heater BACT Emission Limits	15-27	Drillsite Heaters	Report monthly and consecutive 12-month period summation of NO_x, SO_2, CO, and PM emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
5	8.3	Drill Site Heater BACT Emission Limits	15-27	Drillsite Heaters	Submit an excess emissions report if consecutive 12-month summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
5	9, 9.1	Visible Emissions	1-6, 15-27	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not reduce visibility through the exhaust effluent by greater than 10% averaged over any 6 consecutive minutes. Monitoring for emission units 1-6, 15-27 shall consist of annual certification that each of these emission units fired only gas.	*Verified through recordkeeping that **EU IDs 1-6, 15-27** burned only gas during certification period.*	X		
5	10, 10.1	NO_x Emission Limit for Heater	8	Howe-Baker Heater	Do not allow the NO_x emissions to exceed 0.1 lb/MMBtu. Demonstrate compliance using records which demonstrate the heater burners are maintained in good operating condition and in accordance with current CPAI established guidelines and operating procedures.	*Recordkeeping, routine maintenance, and good operational procedures.*	X		
5	11	Fuel Consumption Monitoring	1-27	Fuel-Fired Equipment	Maintain and operate fuel gas meters or provide other means of estimating fuel consumption to determine the total volume of fuel gas consumed by emission units 1-6, 7-8, 11-14 and 15-27. Fuel consumption may be estimated for emission units 9-10.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	11.1	Fuel Consumption Monitoring	1-27	Fuel-Fired Equipment	Monitor and record the monthly fuel consumption for turbines (emission units 1-6 combined), Broach and Howe-Baker heaters (emission units 7-8), diesel-fired equipment (emission units 9-10), flares (emission units 11-14), and drill site heaters (emission units 15-27 combined).	*Recordkeeping*	X		
5	11.2	Fuel Consumption Monitoring	1-27	Fuel-Fired Equipment	Report monthly fuel consumption for each emission unit group (turbines, Broach and Howe-Baker heaters, diesel-fired equipment, flares and drill site heaters), and the stationary source total fuel consumption for each month covered by the reporting period using the Operating Report.	*Operating Reports*	X		
5	12	NOx Emission Increase	6	GE Frame 5 Turbine	Limit the increase in NOx emissions from this emission unit to 35 tpy when using N-liners.	*Monitoring not required. No N-liners used.*			X
5	12.1	NOx Emission Increase	6	GE Frame 5 Turbine	Notify ADEC within 7 days if the N-liners are installed.	*Recordkeeping*			X
5	12.2	NOx Emission Increase	6	GE Frame 5 Turbine	Monitor, record and report the NOx emissions in accordance with Condition 7 when using N-liners.	*Recordkeeping*			X
5	13	Fuel Gas Sulfur Content Limit	1-8, 11-27	Gas-Fired Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions, annual average.	*Recordkeeping/ Operating Reports*	X		
5	13.1	Fuel Gas Sulfur Content Limit	1-8, 11-27	Gas-Fired Equipment	Monitor compliance monthly by determining sulfur content of fuel gas using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*Operating Reports* *ASTM Method D 4810*	X		
5	13.2	Fuel Gas Sulfur Content Limit	1-8, 11-27	Gas-Fired Equipment	Report the consecutive 12-month average fuel gas H2S concentration, for each month of the reporting period, with each Operating Report.	*Operating Reports*	X		
5	13.3	Fuel Gas Sulfur Content Limit	1-8, 11-27	Gas-Fired Equipment	Submit an excess emissions report if the consecutive 12-month period average fuel gas H2S concentration exceeds 200 ppmv.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
5	14, 14.1, 14.2	Operating Hours for Emergency Equipment	9-10	Diesel-Fired Equipment	Monitor and record monthly hours of operation (emergency and non-emergency) and consecutive 12-month period summation for each emission unit and report in the Operating Report. Emergency equipment must not be operated more than 200 hours each per consecutive 12-month period (non-emergency operation).	*Recordkeeping/ Operating Reports*	X		
5	14.3	Operating Hours for Emergency Equipment	9-10	Diesel-Fired Equipment	Submit an excess emissions report if the consecutive 12-month total hours of non-emergency operation for any given month exceed 200 hours.	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
5	15, 15.1, 15.2	Daily operating limits for emission unit 7	7	Diesel-Fired Equipment	Monitor and record daily hours of operation (emergency and non-emergency) and report in the Operating Report the maximum daily total hours of operation on liquid fuel and fuel gas for each month of the reporting period. Do not operate emission unit 7 for more than 2 hours per day on liquid fuel and 6 hours per day on gas if liquid fuel is used that day (limit not applicable to emergency operations).	*Recordkeeping/ Operating Reports*	X		
5	15.3	Daily operating limits for emission unit 7	7	Diesel-Fired Equipment	Submit an excess emissions report if the emission unit 7 operates for more than 2 hours per day on liquid fuel or more than 6 hours per day on gas if liquid fuel is used that day (excluding emergency operations).	*Recordkeeping/ Operating Reports* *No excess emissions reporting required during the certification period.*			X
5	16	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-6, 13, 27, 42	NSPS emission units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units, any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative. **[This requirement no longer applies to EU IDs 13 and 42 effective 1/19/18.]**	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	17	NSPS Subpart A - Performance Test	1	GE Frame 3 Gas Lift Compressor	Within 60 days of achieving maximum production rate, but no later than 180 days after initial start-up, conduct a NO_x performance test in accordance with 40 CFR 60.8 and 40 CFR 60.335(b) & (c).	*Recordkeeping; Initial performance test conducted January 15 and 16, 2003*	X		
5	18	NSPS Subpart A - Good Air Pollution Control Practice	1-6, 13, 27, 42	Turbines, Flare, Drill Site Heater & Tank	These emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions. **[This requirement no longer applies to EU IDs 13 and 42 effective 1/19/18.]**	*Recordkeeping*	X		
5	19	NSPS Subpart A - Concealment of Emissions	1-6, 13, 42	NSPS emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 22, 23, and 25. **[This requirement no longer applies to EU IDs 13 and 42 effective 1/19/18.]**	*Recordkeeping*	X		
5	20	NSPS Subpart A - Credible Evidence	1-6, 13, 27, 42	NSPS emission units	Nothing in this permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. **[This requirement no longer applies to EU IDs 13 and 42 effective 1/19/18.]**	*N/A - Advisory Condition*	X		
5	21	NSPS Subpart Kb - Requirements (recordkeeping only)	28-41	NSPS Subpart Kb-affected tanks	Keep readily accessible records for the life of the tanks showing the dimensions and an analysis showing the capacity of the storage vessels. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		

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5	22	NSPS Subpart Kb - VOC Standard	42	Slop Oil Tank	Equip this emission unit with a closed vent system and control device. The closed vent system must be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as determined by Method 21. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping* *EPA determined by letter dated August 18, 2006, that this tank is not subject to Subpart Kb, as amended Oct 15, 2003.*	X		
5	22.1	NSPS Subpart Kb - VOC Standard	13	Kaldair Process Control Flair	Operate, monitor, and record parameters of the control device (flare) in accordance with 40 CFR 60.18. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	22.2	NSPS Subpart Kb - VOC Standard	13	Kaldair Process Control Flair	Maintain records of all periods of operation when the flare pilot flame is absent. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	22.3	NSPS Subpart Kb - VOC Standard	13	Kaldair Process Control Flair	Submit records of all periods of operation when the flare pilot flame was absent to EPA semi-annually. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping* *Reports were submitted to EPA in a timely manner.*	X		
5	22.4	NSPS Subpart Kb - VOC Standard	42	Slop Oil Tank	Keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the storage vessel. **[This requirement applies until 1/19/18 only.]**	*Recordkeeping*	X		
5	22.5	NSPS Subpart Kb - VOC Standard	42	Slop Oil Tank	Submit a CAM plan after a significant permit revision to the Slop Oil Tank or as part of the permit renewal.	*Submittal of CAM plan no longer required.* *EPA determined by letter dated August 18, 2006, that this tank is not subject to Subpart Kb, as amended Oct 15, 2003.*			X
5	23.1	NSPS Subpart GG - NO_X Standard	1-2	GE Frame 3 Turbines	Do not allow the corrected exhaust gas concentration of NO_x from these emission units to exceed 175 ppmvd.	*Source test results*	X		

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							Continuous	Intermittent	Not Triggered
5	23.2	NSPS Subpart GG - NO_X Standard	3-5	Ruston Turbines	Do not allow the corrected exhaust gas concentration of NO_X from these emission units to exceed 153 ppmvd.	*Source test results*	X		
5	23.3	NSPS Subpart GG - NO_X Standard	6	GE Frame 5 Turbine	Do not allow the corrected exhaust gas concentration of NO_X from these emission units to exceed 170 ppmvd.	*Source test results*	X		
5	24.1	NO_X MR&R - WAIVERS	1-6	Turbines	Upon request, furnish ADEC with a written copy of any EPA granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
5	24.1	NO_X MR&R - WAIVERS	1-6	Turbines	A copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule must be kept on file.	*Recordkeeping*	X		
5	24.2a	NO_X MR&R - PERIODIC TESTING	1-6	Turbines	If these emission units operate 400 hours or more in any 12-month period during the life of this permit, then Condition 24.2a(i) or 24.2a(ii) must be satisfied.	*Source test data and substitution of source test data.*	X		
5	24.2a(i)	NO_X MR&R - PERIODIC TESTING	1-6	Turbines	For existing turbines not represented by emission data described in Condition 24.2a(ii), a NO_X and O_2 source test must be conducted under 40 CFR 60, Appendix A-7, Method 20 by December 2005 A) for each turbine, or B) on one turbine to represent a group of turbines, if allowed to do so under Condition 24.3.	*Source test data and substitution of source test data.*	X		

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5	24.2a(ii)	NO_X MR&R - PERIODIC TESTING	1-6	Turbines	If condition 24.2a(i) is not satisfied, then if a test following 40 CFR 60, Appendix A-7, Method 20 or following another protocol approved by ADEC was conducted on a turbine between December 2000 and December 2002 (within two years before the issuance date of this permit), and the test shows that emissions at a maximum load are less than 90% of the emission limit in Condition 23, then the permittee may use the results to demonstrate compliance with the limits, but additional testing is required by December 2007.	*CPAI did not rely on this condition to demonstrate compliance.*			X
5	24.2b	NO_X MR&R - TESTING	1-6	Turbines	If test results for one turbine are 90% or more of the emission limit at maximum load, a Method 20 test shall be conducted within one year of the test. At least one additional test is required until at least 2 consecutive tests show emissions less than 90% of limit at loads up to maximum.	*Source test data and substitution of source test data.*			X
5	24.3	NO_X MR&R - SUBSTITUTING TEST DATA	1-6	Turbines	CPAI may use a Method 20 test on only one of the turbines to satisfy the testing requirement if the test is representative of the group and the results are less than 90% of the limit.	*Source test data and substitution of source test data.*	X		
5	24.4	NO_X MR&R - LOAD	1-6	Turbines	Tests shall be in accordance with 40 CFR 60.335(c)(3) or other approved method. Testing shall occur when the turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Source test data and substitution of source test data.*			X
5	24.5a	NO_X MR&R - RECORD KEEPING	1-6	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load and method for calculating load from the measurements.	*Source test data and substitution of source test data.*			X

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							Continuous	Intermittent	Not Triggered
5	24.5b	NO_X MR&R - RECORD KEEPING	1-6	Turbines	For turbines that operate less than 400 hours, keep monthly records of the hours of operation. If a turbine which normally operates less than 400 hours, exceeds that total during any 12 month period, test according to Condition 24.2, or if not possible, then test within one year of exceeding 400 hours of operation in 12 consecutive months.	*Recordkeeping/ Operating Reports*			X
5	24.6a	NO_X MR&R - REPORTING	1-6	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine identification, highest load recorded during the period covered by the operating report.	*Recordkeeping* *Reporting not required during certification period.*			X
5	24.6b	NO_X MR&R - REPORTING	1-6	Turbines	For turbines that have not been tested because they normally operate less than 400 hours in any 12 months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
5	24.6c	NOX MR&R - REPORTING	1-6	Turbines	Submit an excess emissions report if: a test result exceeds the emission standard, Method 20 testing is required by Condition 24.2 or 24.5b but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedance of emission limits in Conditions 6, 7 or 23.	*Recordkeeping/ Operating Reports and source test data* *Excess Emissions reporting not required during the certification period*			X
5	25, 25.1	NSPS Subpart GG - SO_2 Standard	1-6	Turbines	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 0.8 percent by weight. Determine the sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA.	*Operating Reports* *ASTM Method D 4810*	X		

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							Continuous	Intermittent	Not Triggered
5	25.2	NSPS Subpart GG - SO_2 Standard	1-6	Turbines	Fuel sulfur analysis 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.	*Recordkeeping*	X		
5	25.3, 25.4	NSPS Subpart GG - SO_2 Standard	1-6	Turbines	Keep records of monthly fuel gas sulfur analyses. Submit a summary of monthly fuel gas sulfur analytical results with each Operating Report.	*Recordkeeping/ Operating Reports*	X		
5	25.5	NSPS Subpart GG - SO_2 Standard	1-6	Turbines	Annually report the results of monthly fuel gas sulfur analyses to EPA.	*Recordkeeping;* *Report submitted to EPA in a timely manner.*	X		
5	26 (applies until 5/7/18 only)	NSPS Subpart Dc-Recordkeeping	27	Drillsite Heater (3R)	Maintain records of the amount of fuel gas combusted during each day for this emission unit. **[This version of Condition 26 applies to EU ID 27 until 5/7/18 only.]**	*Recordkeeping* *[Subpart Dc has been amended since the CPF-3 permit was issued. The amended version of the rule allows gas-fired affected units to record fuel combustion on a monthly basis instead of a daily basis. On May 7, 2018, CPAI submitted an application to administratively amend the CPF-3 permit to update this condition to match the current version of NSPS Subpart Dc. The new requirement provided in the proposed revision to Condition 26 of the CPF-3 permit is shown on the next row of this report.]*	X		

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							Continuous	Intermittent	Not Triggered
5	26 (effective 5/7/18)	NSPS Subpart Dc-Recordkeeping	27	Drillsite Heater (3R)	Maintain records of the amount of fuel gas combusted by this emission unit as follows - 1) during each operating day for this emission unit; or 2) during each calendar month; or 3) according to an EPA-approved custom fuel monitoring schedule. **[This version of Condition 26 applies to EU ID 27 effective 5/7/18.]**	*Recordkeeping*	X		
6	27	NESHAP Applicability	All	NA	Determine applicability for the stationary source under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement.	*Used EPA and GRI HAPS emission factors to calculate HAPS and to aid in preparation of applicability determinations.*	X		
6	27.1	NESHAP Applicability	All	NA	Keep a record of NESHAPs applicability determination. Maintain records for 5 years or until emission unit changes operation and becomes affected emission unit.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
6	28.1	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(b): No person testing, maintaining, servicing, repairing or disposing of halon-containing equipment or using such equipment for technician training may knowingly vent or otherwise release into the environment any halons used in such equipment, except: -Minimal release associated with good faith attempts to recycle or recover halon -Release of residual halon contained in fully discharged total flooding fire extinguishing systems -Release of halons during testing -Emergency release of halons for the legitimate purpose of fire extinguishing, explosion inertion or other emergency application for which the equipment or systems were designed.	*Recordkeeping* *Technician certification and training.*	X		
6	28.2	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(c): Technicians who test, maintain, service, repair or dispose of halon-containing equipment shall be trained regarding halon emissions reduction within 30 days of hiring.	*Recordkeeping* *Technician certification and training.*	X		
6	28.3	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(d): Do not dispose of halon-containing equipment.	*Recordkeeping* *Technician certification and training.*	X		
6	28.4	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(e): Do not dispose of halon.	*Recordkeeping* *Technician certification and training.*	X		

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							Continuous	Intermittent	Not Triggered
6	28.5	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(f): No owner of halon-containing equipment shall allow halon release to occur as a result of failure to maintain such equipment.	*Recordkeeping* *Technician certification and training.*	X		
6	29.1	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(b): Do not use a substitute for an ozone depleting compound known to be manufactured, processed, or imported in violation of 40 CFR 82 Subpart G or any use restrictions in the acceptability determination.	*Recordkeeping*	X		
6	29.2	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(c): Do not use a substitute without adhering to any use restrictions set by acceptability determination.	*Recordkeeping*	X		
6	29.3	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(d): Do not use a substitute after effective date of any rule-making adding such substitutes to list of unacceptable substitutes.	*Recordkeeping*	X		
7	30.3	Insignificant Emission Units with Actual Emissions > IEU Thresholds	IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Reasonable Inquiry*			X
7	31, 31.1, 31.2	Visible Emissions for IEUs	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) must not exceed 20% for more than 3 minutes in any 1 hour or more than 20% averaged over any 6 consecutive minutes.	*Monitoring not required. Reasonable inquiry.*	X		
7	32	PM Standard for IEUs	IEUs	Insignificant Emission Units	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Monitoring not required. Reasonable inquiry.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	33	Sulfur Compound Emissions for IEUs	IEUs	Insignificant Emission Units	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over three hours.	*Monitoring not required. Reasonable inquiry.*	X		
8	34	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X
8	34	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
8	34	Asbestos NESHAP	All	NA	Perform record keeping in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
8	34	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61, Subpart A and Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X
8	35	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.154: No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
8	35	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.156: All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping* *Contractor certification and training.*	X		
8	35	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.161: Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
8	35	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.162: All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		

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							Continuous	Intermittent	Not Triggered
8	35	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and recordkeeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
8	36.1a	Good Air Pollution Control	7-12, 13, 14-26, 28-41	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures. **[This requirement applies to flare EU ID 13 effective 1/19/18 and no longer applies to tank EU IDs 28 - 41 effective 1/19/18.]**	*Recordkeeping*	X		
8	36.1b	Good Air Pollution Control	7-12, 13, 14-26, 28-41	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions. **[This requirement applies to flare EU ID 13 effective 1/19/18 and no longer applies to tank EU IDs 28 - 41 effective 1/19/18.]**	*Recordkeeping*	X		
8	36.1c	Good Air Pollution Control	7-12, 13, 14-26, 28-41	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures. **[This requirement applies to flare EU ID 13 effective 1/19/18 and no longer applies to tank EU IDs 28 - 41 effective 1/19/18.]**	*Recordkeeping*	X		
8	37	Open Burning	All	NA	Conduct any open burning in accordance with 18 AAC 50.065.	*No open burning during the certification period.* *Monitoring not required.*			X
8	38	Fugitive Emissions	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable Inquiry*	X		
8	39	Dilution	All	NA	Do not dilute emissions to comply with permit.	*Reasonable Inquiry*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	40	Stack Injection	1-27	NA	Do 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 unless approved in writing by ADEC.	*Reasonable Inquiry*	X		
8	41, 30.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Reasonable Inquiry*	X		
8	41.1	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety by completing an excess emissions report.	*Recordkeeping* *No known emissions that present a threat to human health or safety during the certification period.*			X
8	41.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 41.	*Recordkeeping* *No known complaints during the certification period.*			X
8	41.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if ADEC notifies CPAI that it has found a violation of Condition 41.	*Recordkeeping* *No known complaints during the certification period.*			X
8	41.4	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping* *No known complaints during the certification period as documented in the Operating Reports..*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	41.5	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Include a brief summary report with the Operating Report which contains: -the number of complaints received -number of times CPAI or ADEC found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports.* *No known complaints during the certification period as documented in the Operating Reports..*	X		
8	41.6	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Notify ADEC of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *CPAI did not receive any complaints.*			X
8	42	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard.	*Recordkeeping* *No emissions in excess of a technology-based emissions standard were noted during the certification period.*			X
8	42	Technology Based Emission Standard	All	NA	Give ADEC written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered.	*Recordkeeping* *No emissions in excess of a technology-based emissions standard were noted during the certification period.*			X
8	43	Permit Renewal	All	NA	Submit an application to renew Title V permit 6 to 18 months before expiration of current Title V permit. (No sooner than July 3, 2006 and no later than July 2, 2007)	*Recordkeeping* *Permit renewal application was submitted July 2, 2007.*	X		
9	44	ADEC Requested Source Tests	All	NA	Conduct source testing as requested by ADEC.	*ADEC did not request source tests during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
9	45-53	General Source Testing Requirements	All	NA	Comply with the provisions of Section 9 when source tests are conducted.	*Recordkeeping* *No source tests were conducted during the certification period.*			X
10	30.1, 54	Certification	All	All emission units, including insignificant emission units	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		
10	54	Certification	All	NA	Notarize official's signature for this report.	*Recordkeeping*	X		
10	55	Submittals	All	NA	Send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping*	X		
10	56	Information Requests	All	NA	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
10	57	Record keeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		
10	58.1a	Excess Emission and Permit Deviation Reports	All	NA	Report emissions that present a potential threat to human health or safety and excess emissions that CPAI believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *No EE reports in this classification were required during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
10	58.1b	Excess Emission and Permit Deviation Reports	All	NA	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *No EE reports in this classification were required during the certification period.*			X
10	58.1c(i)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations not described in conditions 58.1a, 58.1b, and 58.1c(ii) within 30 days of end of month in which the emissions or deviation occurred or were discovered.	*Recordkeeping* *Excess Emissions/ Permit Deviation Reports* *Operating Reports*	X		
10	58.1c(ii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping* *No EE or PD reports in this classification were required during the certification period.*			X
10	58.2	Excess Emission Reports	All	NA	Report excess emissions using ADEC's online form or form in Section 17 of Operating Permit No. 171TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Excess Emissions reports* *Operating Reports*			X
10	58.3	Permit Deviation Reports	All	NA	Report permit deviations using the form in Section 17 of Operating Permit No. 171TVP01. Provide all information that is called for by the form that is used.	*Recordkeeping* *Permit Deviation reports* *Operating Reports*	X		
10	58.4	Excess Emission and Permit Deviation Reports	All	NA	Provide more detailed written report when requested by ADEC.	*Recordkeeping* *ADEC did not request any additional information pertaining to EE or PD reporting during the certification period.*			X
10	59.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs reports submitted to EPA as required by Condition 24.1 (waivers) and Condition 34 (Asbestos NESHAP) with the Operating Report unless copies have already been provided to ADEC at time of submittal.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
10	59.2	NSPS and NESHAP Reports	All	NA	Provide ADEC a written copy of any EPA granted waivers of federal emission standards, recordkeeping, monitoring, performance testing, reporting requirements or custom monitoring schedules upon request by ADEC.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
10	60	Operating Report	All	NA	Submit an original and 2 copies of a quarterly Operating Report by April 30 for January 1 to March 31, by July 30 for April 1 to June 30, by October 30 for July 1 to September 30 and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
10	60.1	Operating Report	All	NA	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports.*	X		
10	60.2a	Operating Report	All	NA	If excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify: -date of deviation -equipment involved -permit condition affected -description of excess emissions or permit deviation -any corrective action or preventative measures taken and dates of such action.	*Recordkeeping/ Operating Reports*			X
10	60.2b	Operating Report	All	NA	When excess emissions or permit deviations during the reporting period have already been reported, cite the date(s) of those report(s) in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
10	61	Annual Compliance Certification	All	NA	- Submit an original and two copies of annual compliance certification report for the prior year by March 31. - Submit a copy of annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping* *The annual compliance certification was sent to ADEC and EPA by March 31.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	70, 70.1	Visible Emissions Monitoring	7, 9-10	Diesel-Fired Equipment	If required by Condition 3.2 or 3.4, perform a Method 9 visible emissions observation for affected emission units. Conduct the observation within 90 days after triggering this condition.	*Recordkeeping/ Operating Reports* ***Dual fuel-fired EU ID 7*** *operated on liquid fuel less than 400 hours.* ***Liquid fuel-fired EU ID 9*** *operated less than 275 hours.* ***(Liquid fuel-fired EU ID 10 is no longer in service.)***			X
13	70.1	Visible Emissions Monitoring	7, 9-10	Diesel-Fired Equipment	Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping*			X
13	70.2	Visible Emissions Reporting	7, 9-10	Diesel-Fired Equipment	Include with each Operating Report the results of all Method 9 readings conducted during the reporting period.	*Recordkeeping/Operating Reports*			X
13	71	Corrective Actions Resulting from VEOs	7, 9-10	Diesel-Fired Equipment	Perform corrective actions within 14 days if 18 consecutive minutes of Method 9 observations result in an 18 minute average opacity >20 percent and conduct a follow-up Method 9 observation in accordance with Condition 70.1 within 30 days of completing the corrective action.	*No corrective action required*			X
13	71.1	Record keeping for Corrective Actions	7, 9-10	Diesel-Fired Equipment	Keep written records of the starting date, completion date, and a description of any actions taken to reduce visible emissions.	*Recordkeeping*			X
13	71.2	Reporting of Corrective Actions	7, 9-10	Diesel-Fired Equipment	Include copies of records required by Condition 71.1 with each Operating Report.	*Recordkeeping/ Operating Reports*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	72, 72.1, 72.3	PM Monitoring	7, 9-10	Diesel-Fired Equipment	Conduct a PM source test no later than 180 days after the first follow-up Method 9 observation performed under Condition 70 results in an 18-minute average opacity >20 percent. (This requirement is waived for an individual emission unit if a PM source test on the unit has shown compliance with the PM standard since permit issuance or if a follow-up VEO conducted using Method 9 during the 180 days shows that an 18-minute average opacity is < or = 20 percent.)	*PM source test not required*			X
13	72.2a	PM Reporting	7, 9-10	Diesel-Fired Equipment	During each PM source test, perform an 18-minute visible emission observation to obtain 72 individual 15-second readings, and submit a summary of the results to ADEC with the PM source test report. Submit the source test report in accordance with Condition 52.	*PM source test not required*			X
13	72.2b	PM Reporting	7, 9-10	Diesel-Fired Equipment	Submit an excess emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*PM source test not required*			X
13	73, 73.1	Visible Emissions Monitoring for Flares	11-14	Flares	Monitor the first six scheduled daylight flare events during the life of the permit using Method 9 for 18 minutes to obtain 72 individual 15-second readings.	*A total of six (6) scheduled daylight flare events have been monitored at CPF-3 during the permit term. Method 9 observation reports were completed for each event.*	X		
13	73.2	Recordkeeping for Flare VEOs	11-14	Flares	For each observed flare event, record: 1) the flare emission unit ID number 2) results of the Method 9 observations 3) reason(s) for flaring 4) date, beginning and ending time of event 5) cumulative volume of gas flared.	*Recordkeeping/ Operating Reports* *No flare events were observed during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
13	73.3	Reporting for Flare VEOs	11-14	Flares	Until six flare events have been monitored, each qualifying flare event must be monitored or an explanation of the reason the event was not monitored must be included with the next Operating Report.	*Recordkeeping/ Operating Reports* *No flare events were observed during the certification period.*			X
13	73.4	Reporting for Flare VEOs	11-14	Flares	If applicable, attach a copy of the records required by Condition 73.2 with the Operating Report.	*Recordkeeping/ Operating Reports* *No flare events were observed during the certification period.*			X
13	73.5	Reporting for Flare VEOs	11-14	Flares	Submit an excess emissions report if observation of the flares under Conditions 73 and 73.1 results in an opacity >20 % for 3 minutes in any one hour or any six consecutive minutes.	*Recordkeeping* *No excess emissions reporting required*			X

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 4
Kuparuk STP

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through December 31, 2018

Air Quality Operating Permit No. AQ0172TVP02

ConocoPhillips Alaska, Inc.

Kuparuk Seawater Treatment Plant

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

ED_004016I_00012166-00105

Title V Compliance Certification Report - Kuparuk Seawater Treatment Plant - ConocoPhillips Alaska, Inc. Permit No. AQ0172TVP02 for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	1.1	Visible Emissions	1-5, 7	Fuel Burning Equipment	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-5:*** *burned only gas* ***Liquid fuel-fired EU ID 7:*** *monitoring not required; reasonable inquiry*	X		
3	1.2, 5.1	Visible Emissions	1-5	Fuel Burning Equipment	Burn only gas as fuel. Certify in each operating report that each of these emission units burned only gas.	*Recordkeeping/ Operating Reports* *Certification was provided in each operating report.* ***EU IDs 1-5*** *burned only gas.*	X		
3	1.2, 5.1	Visible Emissions	1-5	Fuel Burning Equipment	Submit a permit deviation report if any fuel is burned other than gas.	*Recordkeeping* *Permit deviation report not required during the certification period.*			X
3	1.3	Visible Emissions	7	Liquid Fuel Burning Equipment	If this emission unit did not operate more than 1,270 hours in any rolling 12-month period ending during the permit term, monitoring shall consist of an annual certification of compliance with the visible emissions standard.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *operated 1,270 hours or less for each 12-month period during the permit term to date.* *Compliance with visible emissions standard assessed based on reasonable inquiry.*	X		
3	1.3	Visible Emissions	7	Liquid Fuel Burning Equipment	If this emission unit operated more than 1,270 hours in any rolling 12-month period at any time during the permit term, monitor, record, and report visible emissions in accordance with Conditions 2 through 4.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *operated 1,270 hours or less for each 12-month period during the permit term to date.* *Visible emissions monitoring not required.*			X
3	2	Visible Emissions	7	Liquid Fuel Burning Equipment	If this emission unit operated more than 1,270 hours in any rolling 12-month period ending during the permit term, institute the Method 9 Plan and perform Method 9 visible emissions observations.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *operated 1,270 hours or less for each 12-month period during the permit term to date.* *Visible emissions monitoring not required.*			X
3	2.1	Method 9 Plan	7	Liquid Fuel Burning Equipment	Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping* *Visible emissions monitoring not required*			X

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							Continuous	Intermittent	Not Triggered
3	2.1a	Method 9 Plan	7	Liquid Fuel Burning Equipment	Conduct the initial observation within 30 days after triggering this condition (operation more than 1,270 hours in any rolling 12-month period).	*Recordkeeping* *Visible emissions monitoring not required*			X
3	2.1a	Method 9 Plan	7	Liquid Fuel Burning Equipment	If this emission unit is replaced during the term of the permit, observe the exhaust for 18 minutes within 30 days of startup.	*Recordkeeping* ***EU ID 7*** *was not replaced during the certification period.*			X
3	2.1b	Method 9 Plan	7	Liquid Fuel Burning Equipment	Method 9 observations must be conducted at least once each calendar month that the emission unit operates after the initial Method 9 observation until the allowance in Condition 2.1c for reduced monitoring is satisfied.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	2.1c	Method 9 Plan	7	Liquid Fuel Burning Equipment	After observing emissions for three consecutive operating months under condition 2.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions at least semiannually for 18 minutes until the allowance in Condition 2.1d for reduced monitoring is satisfied.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	2.1c	Method 9 Plan	7	Liquid Fuel Burning Equipment	Semiannual observations must be taken between four and seven months after the previous set of observations.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	2.1d	Method 9 Plan	7	Liquid Fuel Burning Equipment	After completing at least two semiannual 18-minute observations under Condition 2.1c, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	2.1d	Method 9 Plan	7	Liquid Fuel Burning Equipment	Annual observations must be taken between 10 and 13 months after the previous observations.	*Recordkeeping* *Visible emissions monitoring not required*			X

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							Continuous	Intermittent	Not Triggered
3	2.1e	Method 9 Plan	7	Liquid Fuel Burning Equipment	If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that emission unit to at least monthly intervals, until the criteria in condition 2.1c for semiannual monitoring are met.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	3, 3.1a	Visible Emissions Recordkeeping	7	Liquid Fuel Burning Equipment	When conducting Method 9 observations, record all data required on the Visible Emissions Field Data Sheet in Section 12. Include all other information as required by Condition 3.1a on a separate page attached to the Sheet.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	3.1b	Visible Emissions Recordkeeping	7	Liquid Fuel Burning Equipment	When conducting Method 9 observations, determine the six-minute average opacity as described in Condition 3.1b.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	3.1c	Visible Emissions Recordkeeping	7	Liquid Fuel Burning Equipment	When conduction Method 9 observations, calculate and record the highest 18-consecutive-minute averages observed.	*Recordkeeping* *Visible emissions monitoring not required*			X
3	4.1	Visible Emissions Reporting	7	Liquid Fuel Burning Equipment	Include with each Operating Report, for each emission unit under the Method 9 Plan: a) A copy of the observation results of all Method 9 Plan readings conducted during the reporting period unless already submitted to ADEC; b) A summary of all results; c) A summary of any required monitoring or recordkeeping that was not done.	*Operating Report* *No Method 9 monitoring required during the certification period.*			X
3	4.2a	Visible Emissions Reporting	7	Liquid Fuel Burning Equipment	Submit an excess emissions report if the result of a Method 9 observation exceeds an average 20 percent for any six-minute period.	*Recordkeeping* *Excess emissions report not required during the certification period.*			X
3	4.2b	Visible Emissions Reporting	7	Liquid Fuel Burning Equipment	Submit a permit deviation report if monitoring required under Condition 2 was not performed when required. Submit the PD report within three days of the date when monitoring was required.	*Recordkeeping* *Permit deviation report not required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	5	Particulate Matter	1-5, 7	Fuel Burning Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-5:*** *burned only gas* ***Liquid fuel-fired EU ID 7:*** *monitoring not required; reasonable inquiry*	X		
3	5.2	Particulate Matter	7	Liquid Fuel Burning Equipment	If this emission unit did not operate more than 1,270 hours in any rolling 12-month period ending during the permit term, monitoring shall consist of annual certification of compliance with the PM standard.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *operated 1,270 hours or less for each 12-month period during the permit term to date.* *Compliance with PM standard assessed based on reasonable inquiry.*	X		
3	5.2	Particulate Matter	7	Liquid Fuel Burning Equipment	If this emission unit operated more than 1,270 hours in any rolling 12-month period at any time during the permit term, monitor, record, and report PM emissions in accordance with Conditions 6 and 7.	*Recordkeeping/ Operating Reports* ***EU ID 7*** *operated 1,270 hours or less for each 12-month period during the permit term to date.* *PM monitoring not required.*			X
3	6.1a, 6.2, 6.4	PM Monitoring	7	Liquid Fuel Burning Equipment	Conduct a PM source test or repair equipment no later than 6 months after the first follow-up Method 9 observation required under Condition 1.3 and performed under Condition 2 results in an 18-minute average opacity >20 percent. (For stacks with a diameter less than 18 inches, conduct a source test if the 18-minute average opacity is greater than 15% and not more than 20%.) (This requirement is waived for an individual emission unit if a PM source test on the unit has shown compliance with the PM standard during the permit term.)	*Method 9/ Recordkeeping* *No Method 9 monitoring or PM testing during the certification period.*			X
3	6.1b	PM Monitoring	7	Liquid Fuel Burning Equipment	If repairs are made to correct an exceedance of Condition 6.2, perform a Method 9 observation under similar load conditions as during the exceedance to ensure corrected performance.	*Method 9/ Recordkeeping* *No Method 9 monitoring or PM testing during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	6.3	PM Monitoring	7	Liquid Fuel Burning Equipment	During each PM source test, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.	*Method 9/ Recordkeeping* *No Method 9 monitoring or PM testing during the certification period.*			X
3	7.1a	PM Reporting	7	Liquid Fuel Burning Equipment	Submit an excess emissions report if any PM source test result exceeds 0.05 gr/dscf.	*Recordkeeping* *Excess emissions report not required during the certification period.*			X
3	7.1b	PM Reporting	7	Liquid Fuel Burning Equipment	Submit a permit deviation report within one day of the date when testing or repairs were required if PM source testing or repairs required under Condition 6.1 were not performed within 6 months of triggering Condition 6.1.	*Recordkeeping* *Permit deviation report not required during the certification period.*			X
3	7.2	Visible Emissions Reporting	7	Liquid Fuel Burning Equipment	For stacks with a diameter less than 18 inches, submit to ADEC a report if the 18-minute average opacity is greater than 15% within 30 days of the end of the month in which the observations occurred under Condition 6.2b.	*Method 9/ Recordkeeping* *No Method 9 monitoring or PM testing during the certification period.*			X
3	7.3	Operating Report	7	Liquid Fuel Burning Equipment	Include with each Operating Report: (i) dates, EU IDs and results when an observed 18-minute average exceeded Condition 6.2 (20%/15%); (ii) a summary of the results of any PM testing under Condition 6; and (iii) copies of any VE results that exceed the thresholds in Condition 6.2, if not already submitted	*Operating Report* *No Method 9 monitoring or PM testing required during the certification period.*			X
3	8	Sulfur Compound Emissions	1-5, 7	Fuel Burning Equipment	Sulfur compound emissions from these emission units, expressed as SO_2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO2 material balance*	X		
3	8.2	Sulfur Compound Emissions - for Fuel Gas	1-5	Fuel Burning Equipment	Monitor, record, and report as required by Conditions 15.1 through 15.4 and Condition 30.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	8.3, 8.5	Sulfur Compound Emissions - for North Slope Diesel	7	Liquid Fuel Burning Equipment	Comply with the liquid fuel S content limit of 0.25 percent sulfur by weight	*Recordkeeping*	X		
3	8.4	Sulfur Compound Emissions - for North Slope Diesel	7	Liquid Fuel Burning Equipment	For liquid fuel used from a North Slope topping plant in any given month, obtain fuel sulfur analysis results from the plant for that month.	*Recordkeeping*	X		
3	8.4a	Sulfur Compound Emissions - for North Slope Diesel	7	Liquid Fuel Burning Equipment	Include a list of sulfur contents analysis results from a North Slope topping plant for each month in the Operating Report.	*Operating Reports*	X		
3	8.4b	Sulfur Compound Emissions - for North Slope Diesel	7	Liquid Fuel Burning Equipment	If the fuel sulfur content from a North Slope topping plant for any month exceeds 0.75% by weight, submit an EE/PD report	*Recordkeeping* *No reporting required.*			X
3	8.6, 8.9b(i)	Sulfur Compound Emissions - for Other Fuel Oil	7	Liquid Fuel Burning Equipment	Keep receipts and report fuel grade and amount of third-party diesel received in Operating Report.	*Recordkeeping/ Operating Reports*			X
3	8.6a, b, 8.9b(ii)	Sulfur Compound Emissions - for Other Fuel Oil	7	Liquid Fuel Burning Equipment	For liquid fuel from a third party supplier; either test the sulfur content or obtain a supplier analysis and report in the Operating Report. Must include signed statement from the supplier or refinery of what fuel the test results represent.	*Recordkeeping/ Operating Reports*			X
3	8.6a, 8.7	Sulfur Compound Emissions - for Other Fuel Oil	7	Liquid Fuel Burning Equipment	If fuel testing is performed to comply with Condition 8.6a, use an appropriate method in either 18 AAC 50.035 or as approved in writing by the Department	*Recordkeeping/ Operating Reports*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	8.8, 8.9b(iii)	Sulfur Compound Emissions - for Other Fuel Oil	7	Liquid Fuel Burning Equipment	If the fuel sulfur content for any load of fuel exceeds 0.75% by weight, calculate SO_2 emissions (ppm) using either the material balance calculation in Section 13 of Operating Permit no. AQ0172TVP02 or Method 19. Include the calculations in the next Operating Report.	*Recordkeeping/ Operating Reports SO2 material balance*			X
3	8.9a	Sulfur Compound Emissions - for Other Fuel Oil	7	Liquid Fuel Burning Equipment	Submit an excess emissions report if SO_2 emissions calculated under Condition 8.8 exceed 500 ppm. Include the calculations in the report.	*Recordkeeping Excess emissions report not required during the certification period.*			X
3	9	Turbine BACT Emission Limits	1-2	Turbines	Actual emissions from turbines shall be limited as indicated in Table B of Air Quality Operating Permit No. AQ0172TVP02.	*Source test data, installation of BACT, recordkeeping and good operational procedures*	X		
3	9.1	Turbine BACT Emission Limits	1-2	Turbines	Use emission factors in Section 11 of Operating Permit No. AQ0172TVP02 and hours of operation and/or fuel used to calculate monthly and 12-month consecutive summation of emissions for NOx, SO2, CO, PM, and VOC.	*Recordkeeping*	X		
3	9.2	Turbine BACT Emission Limits	1-2	Turbines	Report monthly and consecutive 12-month period summation of NOx, SO2, CO, PM, and VOC emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
3	9.3	Turbine BACT Emission Limits	1-2	Turbines	Submit an excess emissions report if 12-month consecutive summation of emissions of any air contaminant exceeds the BACT limit for that contaminant.	*Recordkeeping Excess emissions report not required during the certification period.*			X
3	9.4	Turbine BACT Emission Limits	1-2	Turbines	Monitor, record, and report in accordance with Condition 9.5 to demonstrate compliance with short-term BACT NOx emission limits in Table B of Air Quality Operating Permit No. AQ0172TVP02.	*Approved substitution of source test data. Source test completed on unit tag no. G-CJ33-B at Kuparuk STP on May 16, 2010.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	9.5, 9.5a(i), (ii)	Turbine BACT Limits NOx and CO MR&R - PERIODIC TESTING	1	Turbines	If this emission unit operates 400 hours or more in any 12-month period during the life of this permit, conduct a NOx source test under 40 C.F.R. 60, Appendix A-7, Method 20 and a CO source test under 40 C.F.R. 60, Appendix A-4, Method 10 within 3 years after issuance of this permit either: (i) for each turbine, or (ii) on one turbine to represent a group of turbines, if allowed to do so under condition 29.2b.	*Source test completed on unit tag no. G-CJ33-B (Unit 2) at Kuparuk STP on May 16, 2010.* *Approved substitution of source test data makes this test applicable to Unit 1 as well.*	X		
3	9.5, 9.5a(i), (ii)	Turbine BACT Limits NOx and CO MR&R - PERIODIC TESTING	2	Turbines	If this emission unit operates 400 hours or more in any 12-month period during the life of this permit, conduct a NOx source test under 40 C.F.R. 60, Appendix A-7, Method 20 and a CO source test under 40 C.F.R. 60, Appendix A-4, Method 10 within 3 years after issuance of this permit either: (i) for each turbine, or (ii) on one turbine to represent a group of turbines, if allowed to do so under condition 29.2b.	*Source test completed on unit tag no. G-CJ33-B (Unit 2) at Kuparuk STP on May 16, 2010.*	X		
3	9.5b, 57	Turbine BACT Limits NOx MR&R	1-2	Turbines	Report the results of any source testing required by Condition 9.5 according to Condition 57.	*Recordkeeping / Reporting* *Reporting of 2010 source test results was done in 2010.*			X
3	9.5b	Turbine BACT Limits NOx MR&R	1-2	Turbines	Use updated emission factors from source test data in place of those in Section 11 of the permit to calculate emissions under Condition 9.1.	*Recordkeeping/ Operating Reports*	X		
3	9.5c	Turbine BACT Limits NOx MR&R	1-2	Turbines	Report the emission factor (source test or published) used to calculate the summary of emissions reported under Condition 9.2 in the Operating Report	*Recordkeeping/ Operating Reports*	X		
3	9, 9.6	BACT Visible Emissions	1-2	Turbines	Visible emissions (opacity) must not reduce visibility through the exhaust effluent by greater than 10% averaged over any 6 consecutive minutes. Monitoring for these emission units shall consist of annual certification that each of these emission units burned only gas.	*Recordkeeping* ***EU IDs 1-2:*** *burned only gas.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	10	Heater BACT Emission Limits	3-5	Gas Fired Heaters	Actual emissions from the heaters shall be limited as indicated in Table C of Air Quality Operating Permit No. AQ0172TVP02.	*Source test results, installation of BACT, recordkeeping and good operational procedures*	X		
3	10.1	Heater BACT Emission Limits	3-5	Gas Fired Heaters	Use emission factors in Section 11 of Operating Permit No. AQ0172TVP02 and hours of operation and/or fuel used to calculate monthly and 12-month consecutive summation of emissions for NOx, SO2, CO, and PM.	*Recordkeeping*	X		
3	10.2	Heater BACT Emission Limits	3-5	Gas Fired Heaters	Report monthly and consecutive 12-month period summation of NOx, SO2, CO, and PM emissions, for each month of reporting period, with Operating Report.	*Operating Reports*	X		
3	10.3	Heater BACT Emission Limits	3-5	Gas Fired Heaters	Submit an excess emissions report if 12-month consecutive summation of emissions of any air pollutant exceeds the BACT limit for that pollutant.	*Recordkeeping* *Excess emissions report not required during the certification period.*			X
3	10.4a	Heater BACT Emission Limits NOx and CO MR&R	3-5	Gas Fired Heaters	Conduct NOx and CO source test using Method 7E and 10 (respectively) by June 30, 2010.	*Source test data/ Recordkeeping* *Source tests on each of the three heaters were completed May 13 - 15, 2010.*	X		
3	10.4b, 57	Heater BACT Emission Limits NOx and CO MR&R	3-5	Gas Fired Heaters	Report the results of any source testing required by Condition 10.4a according to Condition 57.	*Recordkeeping / Reporting* *Reporting of 2010 source test results was done in 2010.*			X
3	10.4b	Heater BACT Emission Limits NOx and CO MR&R	3-5	Gas Fired Heaters	Use updated emission factors from source test data in place of those in Section 11 to calculate emissions under Condition 10.1.	*Recordkeeping/ Operating Reports*	X		
3	10.4c	Heater BACT Emission Limits NOx and CO MR&R	3-5	Gas Fired Heaters	Report the emission factor (source test or published) used to calculate the summary of emissions reported under Condition 10.2 in the Operating Report	*Recordkeeping/ Operating Reports*	X		
3	10, 10.5	BACT Visible Emissions	3-5	Gas Fired Heaters	Visible emissions (opacity) must not reduce visibility through the exhaust effluent by greater than 10% averaged over any 6 consecutive minutes. Monitoring for these emission units shall consist of annual certification that each of these emission units burned only gas.	*Recordkeeping* ***EU IDs 3-5:*** *burned only gas.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	11	Fuel Consumption Monitoring	1-5, 7	Fuel Burning Equipment	Maintain and operate fuel gas meters or provide other means of estimating fuel consumption to determine the total volume of fuel gas consumed by emission units 1-2 and the total volume of fuel gas consumed by emission units 3-5. For emission unit 7, the fuel consumption may be estimated.	*Recordkeeping*	X		
3	11.1	Fuel Consumption Monitoring	1-5, 7	Fuel Burning Equipment	Monitor and record the monthly fuel consumption for turbines (emission units 1-2 combined), heaters (emission units 3-5 combined), diesel-fired equipment (emission unit 7).	*Recordkeeping*	X		
3	11.2	Fuel Consumption Monitoring	1-5, 7	Fuel Burning Equipment	Report monthly fuel consumption for each emission unit group (turbines, heaters, engines), covered by the reporting period using the Operating Report.	*Operating Reports*	X		
3	12.1, 12.2	Hours of Operation Monitoring	1-5	Fuel Burning Equipment	Monitor and record the monthly operating time for each of these emission units, and report in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
3	13, 13.1, 13.2	Operating Hours for Emergency Equipment	7	GM Detroit Allison Emergency Fire Water Pump	Monitor and record monthly hours of emergency and non-emergency operation and consecutive 12-month period summation and report in the Operating Report. Emergency equipment must not be operated more than 200 hours per consecutive 12-month period (non-emergency use).	*Recordkeeping/ Operating Reports*	X		
3	13.3	Operating Hours for Emergency Equipment	7	GM Detroit Allison Emergency Fire Water Pump	Submit an excess emission report if the consecutive 12-month total hours of non-emergency operation for any given month exceed 200 hours.	*Recordkeeping* *Excess emissions report not required during the certification period.*			X
3	14.1 & 14.2	Flue Gas Monitoring	3-5	Heaters	Monitor and record the flue gas O2 content and simultaneous furnace duty (or heat absorbed) for each emission unit not less than once per month and report in the Operating Report.	*Recordkeeping/ Operating Reports*	X		
3	8.1, 15	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 500 ppmv.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	15.1	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	Determine sulfur content of fuel gas monthly using ASTM D 4810-88, D 4913-89, or Gas Producers Association 2377-86, or an alternative analytical method approved by EPA - OR - Monitor according to other methods approved under Conditions 30.1 and 30.2.	*ASTM Method 4810-06 (4810-06 is equivalent to 4810-88), Operating Reports and Recordkeeping*	X		
3	15.1, 15.1a	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	If the fuel gas H_2S analysis exceeds 450 ppmv begin testing fuel gas at least once every 7 days. If fuel gas H_2S analysis exceeds 490 ppmv begin testing fuel gas once every 24 hours.	*Recordkeeping* *No increase in testing frequency required during the certification period.*			X
3	15.1, 15.1b	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	If no fuel gas H_2S sample exceeds 450 ppm during six continuous months of monitoring, return to a monthly fuel gas monitoring schedule.	*Recordkeeping* *No increase in testing frequency required during the certification period.*			X
3	15.2, 15.3	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	Record and report the fuel gas source, H_2S concentration, and sample date for every sample taken with the Operating Report.	*Recordkeeping/ Operating Reports*	X		
3	15.4	Fuel Gas Sulfur Content Limit	1-5	Fuel Gas Burning Equipment	Submit an excess emissions report if any fuel gas H_2S concentration exceeds 500 ppmv.	*Recordkeeping* *Excess emissions report not required during the certification period.*			X
3	16	Fuel Oil Sulfur Content Limit	7	Diesel-Fired Equipment	Do not burn diesel fuel that contains greater than 0.25% sulfur by weight.	*Recordkeeping*	X		
3	16.1	Fuel Oil Sulfur Content Limit	7	Diesel-Fired Equipment	Obtain the fuel analysis in accordance with Conditions 8.4 and 8.6.	*Recordkeeping*	X		
3	16.2	Fuel Oil Sulfur Content Limit	7	Diesel-Fired Equipment	Complete an excess emission report if the sulfur content for any delivery received exceeds 0.25%.	*Recordkeeping* *No reporting required.*			X
3	17.1	Insignificant Emission Units - Compliance Certification	7, All IEUS	Insignificant Emission Units	Submit the Compliance Certification for insignificant emissions units based on reasonable inquiry.	*Reasonable inquiry*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	17.3	Insignificant Emission Units with Actual Emissions > IEU Thresholds	7	GM Detroit Allison Emergency Fire Water Pump	If this emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Recordkeeping* *Confirmed actual emissions*			X
3	17.3	Insignificant Emission Units with Actual Emissions > IEU Thresholds	IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Reasonable inquiry*			X
3	18	Visible Emissions for IEUs	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) from insignificant emission units must not exceed 20% averaged over 6 consecutive minutes.	*Monitoring not required. Reasonable inquiry.*	X		
3	19	PM Standard for IEUs	IEUs	Insignificant Emission Units	PM emitted from insignificant emission units must not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Monitoring not required. Reasonable inquiry.*	X		
3	20	Sulfur Compound Emissions for IEUs	IEUs	Insignificant Emission Units	Sulfur compound emissions from insignificant emission units, expressed as SO_2, must not exceed 500 ppm averaged over three hours.	*Monitoring not required. Reasonable inquiry.*	X		
4	21.1	NSPS Subpart A - Notification Requirements	1, 2	Turbines	Notify EPA and ADEC of the date any construction or reconstruction commences on EU ID 1 or 2 or construction of any new NSPS-affected facility commences. Notification to be postmarked no later than 30 days after such date.	*Recordkeeping* *No reporting required.*			X
4	21.2	NSPS Subpart A - Notification Requirements	1, 2	Turbines	Notify EPA and ADEC of the actual date of initial startup of a new NSPS-affected facility within 15 days of startup.	*Recordkeeping* *No reporting required.*			X

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							Continuous	Intermittent	Not Triggered
4	21.3	NSPS Subpart A - Notification Requirements	3-5, 7	John Zink Heaters and GM Detroit Allison Emergency Fire Water Pump	Notify EPA and ADEC 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. Notification to be postmarked 60 days or as soon as practicable before the change is commenced. Notification to include information listed in Condition 21.3a-d	*Recordkeeping* *No reporting required.*			X
4	21.4	NSPS Subpart A - Notification Requirements	3-5, 7	John Zink Heaters and GM Detroit Allison Emergency Fire Water Pump	Notify EPA and ADEC of any proposed replacement of an existing facility. Notification to be postmarked 60 days (or as soon as practicable) before construction is commenced and must include information required in Condition 21.4a-g.	*Recordkeeping* *No reporting required.*			X
4	22	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-2	NSPS emission units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units, any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative.	*Recordkeeping*	X		
4	23, 23.1, 23.2, 23.3, 23.4	NSPS Subpart A - EEMSP Report	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Submit an annual Excess Emissions and Monitoring Systems Performance Report to EPA (postmarked by the 30th day following the end of each calendar year) addressing the fuel gas H_2S monitoring for the Subpart GG-affected turbines. Include all information required by the report. A copy of the EEMSP report must also be sent to ADEC.	*Recordkeeping* *Summary Report Form was submitted (No EEMSP report required)*			X

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							Continuous	Intermittent	Not Triggered
4	24, 24.1, 24.2	NSPS Subpart A - Summary Report Form	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Submit an annual Summary Report Form to EPA (postmarked by the 30th day following the end of each calendar year) for each pollutant monitored for this emission unit. If the duration of excess emissions is less than 1% of the total operating time and the CMS downtime is less than 5% of the total operating time, submit a summary report form instead of the EEMSP report, otherwise submit the summary report along with the EEMSP. A copy of the report must also be sent to ADEC.	*Recordkeeping* *Summary Reports were submitted in a timely manner.*	X		
4	25	NSPS Subpart A - Performance Tests	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Conduct initial source tests within 60 days after achieving the maximum production rate at which the unit will be operated, but not later than 180 days after initial startup at such other times as may be required by EPA and provide the Department and EPA with a written report of the results of the source test. Tests shall be conducted according to Section 6 of the permit and as outlined in Conditions 25.1 through 25.4.	*Source test data/ Recordkeeping* *No tests requested by EPA during the certification period*			X
4	25.1	NSPS Subpart A - Performance Tests	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Conduct source tests and reduce data per 40 CFR 60.8(b) and provide the Department copies of any EPA waivers or approvals of alternative methods.	*Source test data/ Recordkeeping* *No tests requested by EPA during the certification period*			X
4	25.2	NSPS Subpart A - Performance Tests	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Conduct source tests under conditions specified by EPA to be based on representative performance of EU IDs 1 and 2	*Source test data/ Recordkeeping* *No tests requested by EPA during the certification period*			X
4	25.3	NSPS Subpart A - Performance Tests	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Notify the Department and EPA at least 30 days in advance of the source test.	*Source test data/ Recordkeeping* *No tests requested by EPA during the certification period*			X

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							Continuous	Intermittent	Not Triggered
4	25.4	NSPS Subpart A - Performance Tests	1 - 2	Fuel gas fired NSPS Subpart GG-affected turbines	Provide adequate sampling ports, safe sampling platform's), safe access t sampling platform's) and utilities for sampling and testing equipment.	*Source test data/ Recordkeeping* *No tests requested by EPA during the certification period*			X
4	26	NSPS Subpart A - Good Air Pollution Control Practice	1-2	NSPS emission units	At all times, including start-up, shutdown and malfunction, these emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.	*Recordkeeping*	X		
4	27	NSPS Subpart A - Credible Evidence	1-2	NSPS emission units	Nothing in this permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.	*N/A - Advisory Condition*	X		
4	28	NSPS Subpart A - Concealment of Emissions	1-2	NSPS emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 29 and 30.	*Recordkeeping*	X		
4	29	NSPS Subpart GG - NO_X Standard	1-2	Turbines	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 153 ppmv at 15% O2 dry exhaust.	*Compliance determined by source test results*	X		
4	29.1	NO_X MR&R - WAIVERS	1-2	Turbines	Upon request, furnish ADEC with a written copy of any U.S. EPA granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.	*Recordkeeping* *CPAI did not receive any requests from ADEC for copies of the listed documents during the certification period.*			X
4	29.1	NO_X MR&R - WAIVERS	1-2	Turbines	A copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule must be kept with the permit.	*Recordkeeping*	X		
4	29.2a	NO_X MR&R - PERIODIC TESTING	1-2	Turbines	If either of these emission units operates 400 hours or more in any 12-month period during the life of this permit, then Condition 29.2a(i)A or 29.2a(i)B must be satisfied.	*Test completed May 16, 2010 on Unit 2.* *Substitution of source test data for Unit 1 based on test completed on Unit 2..*	X		

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							Continuous	Intermittent	Not Triggered
4	29.2a(i)(A)	NO_X MR&R - PERIODIC TESTING	1-2	Turbines	For existing turbines not represented by emission data described in Condition 29.2a(i)(B), a NOx and O2 source test must be conducted under 40 CFR 60, Appendix A-7, Method 20 by **March 2, 2012** A) for each turbine, or B) on one turbine to represent a group of turbines, if allowed to do so under Condition 29.2b.	*Test completed May 16, 2010 on Unit 2.* *Substitution of source test data for Unit 1 based on test completed on Unit 2..*	X		
4	29.2a(i)(B)	NO_X MR&R - PERIODIC TESTING	1-2	Turbines	If condition 29.2a(i)(A) is not satisfied, then If a test following 40 CFR 60, Appendix A-7, Method 20 or following another protocol approved by ADEC was conducted on a turbine between **March 2007 and March 2009** (i.e., within two years before the issuance date of this permit), and the test shows that emissions at a maximum load are less than 90% of the emissions limit in Condition 29, then testing is required by March 2, 2014.	*CPAI did not rely on this condition to demonstrate compliance.*			X
4	29.2a(ii)	NO_X MR&R - PERIODIC TESTING	1-2	Turbines	If test results for any turbine are 90% or more of the emission limit at maximum load, a Method 20 test shall be conducted within one year of the test. At least one additional test is required until at least 2 consecutive tests show emissions less than 90% of the limit at loads up to maximum.	*Recordkeeping* *Source test results*			X
4	29.2b	NOX MR&R - SUBSTITUTING TEST DATA	1-2	Turbines	CPAI may use a Method 10 or 20 test under conditions 9.5, 29.2a(i) or 29.2a(ii) performed on only of the turbines to satisfy the testing requirements if the test is representative of the group and the results are less than or equal to 90% of the applicable BACT or NSPS limit and are projected under condition 29.2c to be less than or equal to 90% of the applicable limit at maximum load.	*Recordkeeping* *Source test results*	X		
4	29.2c	NO_X MR&R - Load	1-2	Turbines	Tests shall be in accordance with 40 CFR 60.335(b)(2) or other approved method. Testing shall occur when turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Recordkeeping* *Source test results*			X

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							Continuous	Intermittent	Not Triggered
4	29.3a	NO_X MR&R - Recordkeeping	1-2	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load, and the method for calculating load from the measurements. Within one month of demonstrating highest load under Condition 29.2c(iii)(A)(2), submit to ADEC how load or load surrogates will be measured and a schedule for necessary equipment installation and monitoring.	*Recordkeeping* *Source test results*			X
4	29.3b	NO_X MR&R - Recordkeeping	1-2	Turbines	For turbines that operate less than 400 hours, keep monthly records of the hours of operation. If a turbine which normally operates less than 400 hours exceeds that total during any 12 month period, test according to Condition 29.2, or if not possible, then test within one year of exceeding 400 hours of operation in 12 consecutive months.	*Recordkeeping/ Operating Reports*			X
4	29.4a	NO_X MR&R - Reporting	1-2	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine ID, and highest load recorded under Condition 29.3a during the period covered by the operating report.	*Recordkeeping* *Reporting not required during certification period.*			X
4	29.4b	NOX MR&R - Reporting	1-2	Turbines	For turbines that have not been tested because they normally operate less than 400 hours in any 12 months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
4	29.4c	NOX MR&R - Reporting	1-2	Turbines	Submit an excess emissions report if: a test result exceeds the emission standard, Method 20 testing is required by Condition 29.2 or 29.3b but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedance of emission limits in Conditions 29.2c(iii)(B) and 29.2c(iii)(C).	*Recordkeeping/ Operating Reports/ Source test data.* *Excess emissions reporting not required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
4	30, 30.1a, 30.1b	NSPS Subpart GG - SO2 Standard	1-2	Turbines	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 0.8 percent by weight. Demonstrate compliance by either: (i) demonstrating that the fuels fired in these emission units meet the definition of natural gas found in 40 CFR 60.331(u), or (ii) monitoring the total sulfur content of the fuels burned in these emission units as described under 40 CFR 60.335(b)(10) and Condition 30.2, or (iii) if the total sulfur content of the gaseous fuels during the most recent performance test was less than 4000 ppmw, the following methods may be used to measure the major sulfur compounds -- ASTM D4084-82, 94, D5504-01, D6228-98, or GPA Standard 2377-86, or (iv) monitoring according to the custom fuel monitoring schedule and plan as allowed under Condition 30.1c.	*ASTM Method D 4810 as allowed by the custom fuel monitoring schedule and plan.* *Recordkeeping/ Operating Reports* *Natural gas demonstration has been completed, but CPAI did not rely on this demonstration to reduce the fuel gas monitoring and reporting frequency during the certification period.*	X		
4	30.1b	NSPS Subpart GG - SO2 Standard	1-2	Turbines	Use an approved method when making the optional demonstration that the fuel gas fired by these emission units meets the definition of natural gas.	*A natural gas demonstration has been completed using approved methods, but CPAI is not relying on this demonstration to reduce the fuel gas monitoring and reporting frequency during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
4	30.1c	NSPS Subpart GG - SO2 Standard	1-2	Turbines	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. The approved CFMS requires determination of the sulfur content of fuel gas at least monthly using ASTM D4810-88, D4913-89 or Gas Producers Association method 2377-86 or an alternative analytical method approved by EPA.	*ASTM Method D 4810 as allowed by the custom fuel monitoring schedule and plan.* *Recordkeeping/ Operating Reports*	X		
4	30.1d	NSPS Subpart GG - SO2 Standard	1-2	Turbines	If compliance is NOT demonstrated by demonstrating that the fuel gas fired in these emission units meets the definition of natural gas or following a custom fuel monitoring scheduled (such as the one approved under condition 30.1c), and if the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel must be determined and recorded once per unit operating day.	*ASTM Method D 4810 as allowed by the custom fuel monitoring schedule and plan.* *Recordkeeping/ Operating Reports*			X
4	30.2a	NSPS Subpart GG - Fuel Gas Sulfur Testing for SO2 Standard	1-2	Turbines	If periodic sulfur content testing is required under Condition 30.1d a minimum of three fuel samples shall be collected. Determine total sulfur content of the fuel using ASTM D1072-80, 90; D3246-81, 92, 96; D4468-85; or D6667-01.	*ASTM Method D 4810 as allowed by the custom fuel monitoring schedule and plan.* *Recordkeeping/ Operating Reports*			X
4	30.2b	NSPS Subpart GG - Monitoring for SO2 Standard	1-2	Turbines	Fuel sulfur analysis 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.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	30.3	NSPS Subpart GG - Recordkeeping for SO2 Standard	1-2	Turbines	Keep records of monthly fuel gas sulfur analyses.	*Recordkeeping*	X		
4	30.4	Reporting for NSPS Subpart GG SO2 Standard	1-2	Turbines	Annually report the results of monthly fuel gas sulfur analyses to EPA as part of the annual NSPS excess emissions report to U.S. EPA Region 10 in accordance with Conditions 23 and 24. Report excess emissions for all periods of unit operation, including startup, shutdown and malfunction. For the purpose of reports required under Conditions 23 and 24, periods of excess emissions and monitor downtime are defined in 40 CFR 60.334(j). This monitoring is not required if periodic monitoring is not required (i.e., natural gas demonstration is made)	*Recordkeeping* *Report was submitted to EPA in a timely manner.*	X		
5	31	Standard Condition	All	Entire Stationary Source	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.	*Advisory Condition*	X		
5	32	Standard Condition	All	Entire Stationary Source	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.	*Advisory Condition*	X		
5	33	Standard Condition	All	Entire Stationary Source	The permit does not convey any property rights of any sort, not any exclusive privilege.	*Advisory Condition*	X		
5	34, 35, 36	Assessable Emissions	All	NA	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to ADEC by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emissions estimates were submitted by March 31.*	X		

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							Continuous	Intermittent	Not Triggered
5	37.1	Good Air Pollution Control	3-5, 7	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
5	37.2	Good Air Pollution Control	3-5, 7	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions.	*Recordkeeping*	X		
5	37.3	Good Air Pollution Control	3-5, 7	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
5	38	Dilution	All	NA	Do not dilute emissions to comply with permit.	*Reasonable inquiry*	X		
5	39	Reasonable Precautions - Fugitive Dust	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable inquiry*	X		
5	39.1a	Reasonable Precautions - Fugitive Dust Recordkeeping	All	NA	Keep records of all complaints received.	*Verified that Condition 39.1 was not triggered. No known complaints during the certification period.*			X
5	39.1b	Reasonable Precautions - Fugitive Dust Recordkeeping	All	NA	Keep records of additional precautions taken to: 1 - prevent future dust problems; or 2 - address complaints; 3 - address ADEC inspections which found potential problems	*Verified that Condition 39.1 was not triggered. No known complaints during the certification period.*			X
5	40	Stack Injection	All	NA	Do 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 permit issued before October 1, 2004.	*Reasonable inquiry*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	41, 17.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Reasonable inquiry*	X		
5	41.1a	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety by completing an excess emissions report.	*Recordkeeping* *No known emissions that present a threat to human health or safety during the certification period.*			X
5	41.1b	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 41.	*Recordkeeping* *No known complaints during the certification period.*			X
5	41.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if ADEC notifies CPAI that it has found a violation of Condition 41.	*Recordkeeping* *No known complaints during the certification period.*			X
5	41.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping/ Operating Reports* *No known complaints during the certification period.*			X
5	41.4	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Include a brief summary report with the Operating Report which contains: -the number of complaints received -number of times CPAI or ADEC found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports* *No known complaints during the certification period..*	X		

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							Continuous	Intermittent	Not Triggered
5	41.5	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Notify ADEC of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *CPAI did not receive any complaints.*			X
5	42	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard.	*Recordkeeping* *No emissions in excess of a technology based emissions standard were noted during the certification period.*			X
5	42	Technology Based Emission Standard	All	NA	Submit an excess emissions report including information on the steps taken to minimize emissions within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered.	*Recordkeeping* *No emissions in excess of a technology based emissions standard were noted during the certification period.*			X
5	43	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X
5	43	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
5	43	Asbestos NESHAP	All	NA	Keep records in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
5	43	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61, Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X
5	44	Refrigerant Recycling and Disposal	All	NA	No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
5	44	Refrigerant Recycling and Disposal	All	NA	All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	44	Refrigerant Recycling and Disposal	All	NA	Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
5	44	Refrigerant Recycling and Disposal	All	NA	All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		
5	44	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and recordkeeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
5	45	NESHAP Applicability	All	NA	Determine the applicability for stationary source under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement. If a NESHAP becomes applicable to the source, comply with the standard by the compliance date established by the applicable subpart.	*Used EPA and GRI HAPS emission factors to calculate HAPS and prepare applicability determinations.* *40 CFR 63 Subpart ZZZZ (NESHAP for Stationary Reciprocating Internal Combustion Engines) applies to EU ID 7 at KSTP.*	X		
5	45.1	NESHAP Applicability	All	NA	Keep a record of NESHAPs applicability determination. Maintain records for 5 years or until emission unit changes operation and becomes affected emission unit.	*Records kept on file*	X		
5	46.1	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(b) Do not use a substitute for an ozone depleting compound known to be manufactured, processed, or imported in violation of 40 CFR 82 Subpart G or any use restrictions in the acceptability determination.	*Recordkeeping*	X		
5	46.2	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(c) Do not use a substitute without adhering to any use restrictions set by acceptability determination.	*Recordkeeping*	X		
5	46.3	Significant New Alternatives Policy Program	All	NA	Comply with 40 CFR 82.174(d) Do not use a substitute after effective date of any rule-making adding such substitutes to list of unacceptable substitutes.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	47.1	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(b) No person testing, maintaining, servicing, repairing or disposing of halon-containing equipment or using such equipment for technician training may knowingly vent or otherwise release into the environment any halons used in such equipment, except: -Minimal release associated with good faith attempts to recycle or recover halon -Release of residual halon contained in fully discharged total flooding fire extinguishing systems -Release of halons during testing -Emergency release of halons for the legitimate purpose of fire extinguishing, explosion inertion or other emergency application for which the equipment or systems were designed.	*Recordkeeping* *Contractor certification and training.*	X		
5	47.2	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(c) Technicians who test, maintain, service, repair or dispose of halon-containing equipment shall be trained regarding halon emissions reduction within 30 days of hiring.	*Recordkeeping* *Contractor certification and training.*	X		
5	47.3	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(d) Do not dispose of halon-containing equipment.	*Recordkeeping* *Contractor certification and training.*	X		
5	47.4	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(e) Do not dispose of halon.	*Recordkeeping* *Contractor certification and training.*	X		
5	47.5	Halon Emission Reduction	All	NA	Comply with 40 CFR 82.270(f) No owner of halon-containing equipment shall allow halon release to occur as a result of failure to maintain such equipment.	*Recordkeeping* *Contractor certification and training.*	X		
5	48	Open Burning	All	Entire Stationary Source	Comply with the provisions of 18 AAC 50.065 when conducting open burning at the stationary source.	*No open burning during the certification period.* *Monitoring not required.*			X
6	49	Requested Source Tests	All	NA	Conduct source testing as requested by ADEC to determine compliance with emission limits and permit conditions.	*ADEC did not request any source tests during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
6	50.1	Operating Conditions	1-5, 7	Fuel Burning Equipment	Conduct source testing at points that characterize actual discharge into ambient air.	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	50.2	Operating Conditions	1-5, 7	Fuel Burning Equipment	Conduct source testing at the maximum burn rate or operating capacity of the emission unit or another rate determined by ADEC	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	51.1, 51.2 51.3	Reference Test Methods	All	Fuel Burning Equipment	Conduct HAPs source testing for fuel burning equipment in accordance with 40 CFR 60, 61, 63	*Recordkeeping* *HAPs source tests were not conducted during the certification period.*			X
6	51.4	Reference Test Methods	All	Fuel Burning Equipment	Conduct source testing for visibility through the exhaust effluent in accordance with procedures in Method 9.	*Recordkeeping* *Visible emissions observations were not conducted during the certification period.*			X
6	51.5	Reference Test Methods	All	Fuel Burning Equipment	Conduct source testing on fuel burning equipment for 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 in accordance with 40 CFR 60, Appendix A.	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	51.6	Reference Test Methods	All	Fuel Burning Equipment	Conduct PM-10 source testing for fuel burning equipment in accordance with 40 CFR 51, Appendix M.	*Recordkeeping* *PM-10 source tests were not conducted during the certification period.*			X
6	51.7	Reference Test Methods	All	Fuel Burning Equipment	Source testing for emissions of any pollutant may be determined using an alternative method approved by ADEC in accordance with 40 CFR 63 Appendix A, Method 301.	*Recordkeeping* *No alternative methods were used to complete source tests during the certification period.*			X
6	52	Excess Air Requirements	All	Fuel Burning Equipment	Include only the volume of gases formed from combustion of fuel, plus excess air volume normal for specific emission unit type, corrected to standard conditions for all standard exhaust gas volumes.	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	54	Test Deadline Extension	All	Fuel Burning Equipment	A source testing deadline may be extended if approved in writing by ADEC's appropriate division director or designee.	*Recordkeeping* *No source test deadline extensions requested*			X

Title V Compliance Certification Report - Kuparuk Seawater Treatment Plant - ConocoPhillips Alaska, Inc. Permit No. AQ0172TVP02 for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
6	55, 53	Test Plans	All	Fuel Burning Equipment	Submit test plan to ADEC within 60 days after a requested source test and 30 days prior to scheduled testing. (CPAI is exempt from this requirement when the exhaust is observed for visible emissions under Method 9.)	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	55	Test Plans	All	Fuel Burning Equipment	Test plans to include: -methods and procedures for sampling, testing and quality assurance -how emission unit will operate during test -how test will be documented.	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	56, 53	Test Notification	All	Fuel Burning Equipment	Give ADEC written notice at least 10 days prior to each series of source tests required under Title V permit. (CPAI is exempt from this requirement when the exhaust is observed for visible emissions.)	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	57, 53	Test Reports	All	Fuel Burning Equipment	Submit two copies of source test results to ADEC within 60 days after completing the source test. Provide preliminary results in a shorter period of time if requested by ADEC in writing. (CPAI is exempt from this requirement when the exhaust is observed for visible emissions.)	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
6	57	Test Reports	All	Fuel Burning Equipment	Certify test results	*Recordkeeping* *Source tests were not conducted during the certification period.*			X
7	58	Recordkeeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	59, 17.1	Certification	All	Entire Stationary Source	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		
7	59	Certification	All	Entire Stationary Source	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.	*Recordkeeping* *Excess emissions reports not required during the certification period.* *All other reports were certified.*	X		
7	59.1	Certification	All	Entire Stationary Source	If an electronic signature is used to certify documents, a) the certifying authority registered under AS 09.25.510 must verify that the e-signature is authentic; and b) the person providing the e-signature must agree with the certifying authority to be bound by an electronic record.	*No electronic signatures used for certification.*			X
7	60	Submittals	All	NA	Send 2 copies of reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping*	X		
7	61	Information Requests	All	NA	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit, and copies of records required to be kept by the permit.	*Recordkeeping* *CPAI provided to ADEC all information that was requested during the certification period.*	X		
7	62.1a	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Report emissions that present a potential threat to human health or safety and excess emissions that Permittee believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *No EE reporting under this classification required during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	62.1b	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *No EE reporting under this classification required during the certification period.*			X
7	62.1c(i)	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Report excess emissions and permit deviations not described in conditions 62.1a, 62.1b, and 62.1c(ii) or (iii) within 30 days of end of month in which the emissions or deviation occurred.	*Recordkeeping* *No EE or PD reporting under this classification required during the certification period.*			X
7	62.1c(ii)	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping* *No EE or PD reporting under this classification required during the certification period.*			X
7	62.1c(iii)	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Report permit deviations as required by the permit if monitoring is not performed as required.	*Recordkeeping* *No PD reporting under this classification required during the certification period.*			X
7	62.2	Excess Emission Reports	All	Entire Stationary Source	Report excess emissions and permit deviations using ADEC's online form or the form in Section 14 of this permit. Provide all information that is called for by the form that is used.	*Recordkeeping* *Excess emissions/ Permit deviation reports* *Operating Reports*			X
7	62.3	Excess Emission and Permit Deviation Reports	All	Entire Stationary Source	Provide a more detailed written report when requested by ADEC.	*Recordkeeping* *ADEC did not request more detailed information pertaining to Excess Emissions or Permit Deviation Reports during certification period.*			X
7	63	Operating Report	All	Entire Stationary Source	Submit an original and 1 copy of an Operating Report by April 30 for January 1 to March 31, by July 30 for April 1 to June 30, by October 30 for July 1 to September 30, and by February 15 for October 1 to December 31. The copy may be submitted electronically.	*Recordkeeping/ Operating Reports*	X		
7	63.1	Operating Report	All	Entire Stationary Source	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	63.2a	Operating Report	All	Entire Stationary Source	If excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify: -date of deviation -equipment involved -permit condition affected -description of excess emissions or permit deviations -any corrective action or preventative measures taken and dates of such actions.	*Recordkeeping* *Not applicable during the certification period.*			X
7	63.2b	Operating Report	All	Entire Stationary Source	When excess emissions or permit deviations during the reporting period have already been reported, cite the date(s) of those reports in the Operating Report.	*Recordkeeping/ Operating Reports* *Not applicable during the certification period.*			X
7	63.3	Operating Report	All	Entire Stationary Source	List emissions monitored under condition 29.2a, which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard in the Operating Report. Include: 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.	*Operating Reports* *No additional testing or monitoring triggered during the certification period.*			X
7	63.4	Operating Report	All	Entire Stationary Source	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.	*Operating Reports* *No Operating Report overlap at permit renewal time for this source.*			X
7	64, 64.1, 64.3	Annual Compliance Certification	All	Entire Stationary Source	- Submit an original and one copy (the copy may be submitted electronically) of the annual compliance certification report for the prior year by March 31. - Submit a copy of the annual certification report to EPA Region 10. - Include required information and certification statement	*Recordkeeping/ Compliance Certification Reports*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	64.2	Annual Compliance Certification	All	Entire Stationary Source	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.	*Recordkeeping/ Compliance Certification Reports (Completed in 2009)*	X		
7	65.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs reports submitted to EPA with Operating Report.	*Recordkeeping/ Operating Reports*	X		
7	65.2	NSPS and NESHAP Reports	All	NA	Provide ADEC a written copy of any EPA granted waivers of federal emission standards, recordkeeping, monitoring, performance testing, reporting requirements or custom monitoring schedules upon request by ADEC.	*Recordkeeping* *CPAI did not receive any requests for copies of the listed documents during the certification period.*			X
8	66	Emissions Trading	All	Entire Stationary Source	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.	*Advisory Condition*	X		
8	67	Off Permit Changes	All	Entire Stationary Source	CPAI may make changes that are not addressed or prohibited by this permit, without permit revision, provided that the following requirements are met: - Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; - For off permit changes that result in additional emission units that do not qualify as insignificant, CPAI shall submit contemporaneous notice to EPA and the Department describing the change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change; and - A record is kept describing changes made at the 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.	*Recordkeeping* *Not triggered*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	68	Operational Flexibility	All	Entire Stationary Source	CPAI may make 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 Clean Air 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). For a change in operation, CPAI shall no less than 7 days in advance of the proposed changes, submit a copy of the required notice information to the Department, including: - a brief description of the change; - 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.	*Recordkeeping* *Not triggered*			X
8	69	Permit Renewal	All	NA	Submit an application to renew Title V permit between 6 and 18 months before expiration of current Title V permit. (No sooner than September 2, 2012 and no later than September 2, 2013.) The renewal application must be deemed complete before the permit expiration date (March 2, 2014).	*Recordkeeping* *Permit renewal application was submitted on August 29, 2013. The application was deemed complete on Sept 27, 2013.*	X		
8	70, 71	Permit Applications	All	Entire Stationary Source	Submit original applications to renew or modify the operating permit to ADEC's Anchorage Office. Copies and addenda may be submitted electronically. Applications shall also be submitted to EPA Region 10.	*Recordkeeping* *A copy of the August 2013 renewal application was submitted to EPA.*	X		
9	72	General Compliance Requirements	All	Entire Stationary Source	Compliance with permit terms and conditions is considered to be compliance with those requirements that are included and specifically identified in the permit or determined in writing in the permit to be inapplicable.	*Advisory Condition*	X		
9	73	General Compliance Requirements	All	Entire Stationary Source	Comply with each permit term and condition.	*Compliance status is based on the status declared for all other permit conditions.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
9	74	General Compliance Requirements	All	Entire Stationary Source	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.	*Advisory Condition*	X		
9	75	General Compliance Requirements	All	Entire Stationary Source	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: 1) enter upon the premises where a source subject to the permit is located or where records required by the permit are kept; 2) have access to and copy any records required by the permit; 3) inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and 4) sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.	*Reasonable Inquiry* *One inspection during the certification period.*	X		
9	76	Compliance Schedule	All	Entire Stationary Source	Continue to comply with applicable requirements	*Compliance status is based on the status declared for all other permit conditions.*	X		
9	77	Compliance Schedule	All	Entire Stationary Source	Comply with applicable requirements that become effective during the permit term on a timely basis.	*Recordkeeping* *NSPS Subpart ZZZZ requirements became applicable during the permit term and the compliance deadline (May 3, 2013) occurred during the permit term.*	X		

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 5
Kuparuk TDR

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through September 30, 2018

Air Quality Operating Permit No. AQ0909TVP01

ConocoPhillips Alaska, Inc.

Transportable Drilling Rigs

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.

Shon D. Robinson
Manager, Drilling & Wells

3/21/19
Date

ED_004016I_00012166-00140

Title V Compliance Certification Report - Transportable Drilling Rigs - ConocoPhillips Alaska, Inc. Permit No. AQ0909TVP01 for the Reporting Period January 1 through September 30, 2018

Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	~~1.1,~~ 1.2	Visible Emissions Standards	Heaters and Boilers	Visible emissions (excluding water vapor) must not exceed ~~20% for more than 3 minutes in any 1 hour or more than~~ 20% averaged over any 6 consecutive minutes.	*Visible Emissions Field Data Sheet/ Operating Reports*	X		
3	1.3	Visible Emissions MR&R	Heaters and Boilers	For each significant emission unit with a rated capacity equal to or greater than 1.7 MMBtu/hr operated for each rig, monitor, record, and report visible emissions in accordance with Conditions 2, 3, and 4.	*Recordkeeping/ Operating Reports*	X		
3	2, 2.1a	Visible Emissions Monitoring	Heaters and Boilers	Perform 18-minute observations for visible emissions from heaters and boilers following Method 9 at least once per calendar year for each emission unit operating at least 7 consecutive days at a site governed by the permit.	*Recordkeeping/ Operating Reports*	X		
3	2, 2.1b	Visible Emissions Monitoring	Heaters and Boilers	If Condition 2.1a is not accomplished while the emission unit is located at a site governed by the permit perform 18-minute observations at another site at least once per calendar year.	*Visible Emissions Field Data Sheet/ Operating Reports* *All Method 9 readings were conducted while in operation at a site governed by the permit.*			X
3	3, 3.1	Visible Emissions Recordkeeping	Heaters and Boilers	Use the Visible Emissions Field Data Sheet contained in Section 13 of the permit as a means for keeping records when conducting Method 9 visible emissions observations. Calculate and record the six-minute average opacities and the highest 18-consecutive minute average opacity observed.	*Visible Emissions Field Data Sheet/ Operating Reports* *All required Method 9 records were completed and reported for all completed observations.*	X		
3	4, 4.1	Visible Emissions Reporting	Heaters and Boilers	Include with each Operating Report copies of observation results (unless already supplied to ADEC); a summary of the observations and a summary of any monitoring or recordkeeping required by Conditions 2 and 3 that was not completed.	*Recordkeeping/ Operating Reports*	X		
3	4.2a	Visible Emissions Reporting	Heaters and Boilers	Submit an Excess Emissions report if the results of any Method 9 observations exceed an average of 20% opacity for any six minute period.	*Operating Reports* *EE Reports* *No reporting required during the certification period*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	4.2b	Visible Emissions Reporting	Heaters and Boilers	Submit a Permit Deviation report if any monitoring under Condition 2 was not performed when required.	*Operating Reports* *PD Reports* *No reporting required during the certification period*			X
3	5	Particulate Matter Emissions Standards	Heaters and Boilers	PM emitted from these emission units for each drilling rig shall not exceed 0.05 grains/dscf averaged over 3 hours.	*Visible Emissions Field Data Sheet/ Operating Reports*	X		
3	5.1	Particulate Matter Emissions MR&R	Heaters and Boilers	For each significant emission unit with a rated capacity equal to or greater than 1.7 MMBtu/hr operated for each rig, monitor, record, and report in accordance with Conditions 6, 7, and 8.	*Recordkeeping* *No PM testing required during the certification period*			X
3	6.1, 6.2, 6.4	Particulate Matter Monitoring	Fuel Oil Fired Heaters and Boilers	Within 6 months after a Method 9 observation results in an 18 minute average opacity greater than 20% either: a. Conduct a PM source test or b. make repairs so that emissions no longer exceed an 18 minute average opacity greater than 20%. Observe emissions using Method 9 under load conditions comparable to those when the criteria were exceeded to show that emissions are below criteria level. (This requirement is waived for an emission unit if: a. a PM source test during the most recent semiannual reporting period on that unit shows compliance with the PM standard since permit issuance or b. if a follow up visible emission observation conducted using Method 9 during the following 6 months shows that the excess visible emissions no longer occur.)	*Recordkeeping* *No PM testing required during the certification period*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	6.3	Particulate Matter Monitoring	Fuel Oil Fired Heaters and Boilers	During each 1 hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the average opacity that was measured during each 1 hour test run. Submit a copy of these observations with the source test report.	*Recordkeeping* *No PM testing required during the certification period*			X
3	7	Particulate Matter Recordkeeping	Fuel Oil Fired Heaters and Boilers	Keep records of the results of any PM testing and visible emissions observations conducted under Condition 6.	*Recordkeeping* *No PM testing required during the certification period*			X
3	8.1	Particulate Matter Reporting	Fuel Oil Fired Heaters and Boilers	Submit an Excess Emission and/or Permit Deviation report if the results of any PM source test exceed 0.05 grains/dscf averaged over 3 hours or if the threshold of Condition 6.2 was exceeded and Condition 6.1a or 6.1b was not complied with.	*Recordkeeping/ EE-PD Reports* *No reporting required during the certification period*			X
3	8.2	Particulate Matter Reporting	Fuel Oil Fired Heaters and Boilers	Include in each Operating Report: a. the dates, EU ID(s) and heater/boiler ratings from Section 11, and results when an 18 consecutive-minute opacity observation was greater than 20%; b. summary of results of any PM source testing and visible emissions observations that exceed 0.05 gr/dscf averaged over 3 hours; c. copies of any visible emissions observation results greater than 20 percent averaged over 18 consecutive minutes (if they were not already submitted).	*Operating Reports* *No PM testing required during the certification period*			X
3	9	Sulfur Compound Emissions	Heaters and Boilers	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over three hours.	*Lab Fuel Sulfur Analysis Reports/* *Operating Reports*	X		
3	9.1	Sulfur Compound Emissions - North Slope Diesel	Heaters and Boilers	For liquid fuel delivered from a North Slope topping plant, obtain a monthly fuel sulfur analysis from the topping plant.	*Lab Fuel Sulfur Analysis Reports/* *Operating Reports*	X		

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	9.2	Sulfur Compound Emissions - North Slope Diesel	Heaters and Boilers	Calculate SO2 emissions in PPM using either Section 14 or Method 19 of 40 CFR 60, App. A-7, adopted by reference in 18 AAC 50.040(a) if the fuel sulfur content exceeds 0.75% by weight.	*Lab Fuel Sulfur Analysis Reports/ Recordkeeping*			X
3	9.3a	Sulfur Compound Emissions - North Slope Diesel	Heaters and Boilers	Include in the Operating Report a list of sulfur content measured for fuel delivered from a North Slope topping plant for each month covered by the report.	*Operating Reports*	X		
3	9.3a	Sulfur Compound Emissions - North Slope Diesel	Heaters and Boilers	If the fuel sulfur content for any month exceeds 0.75% by weight, include the calculations completed per Condition 9.2 in the next Operating Report.	*Lab Fuel Sulfur Analysis Reports/ Operating Reports*			X
3	9.3b	Sulfur Compound Emissions - North Slope Diesel	Heaters and Boilers	Submit an Excess Emissions report if fuel sulfur content exceeds 0.75% by weight and calculated SO2 emissions exceed 500 ppm. Document the calculation in the excess emissions report.	*Lab Fuel Sulfur Analysis Reports/ EE-PD Reports No reporting required during the certification period*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	9.4	Sulfur Compound Emissions - Fuel Oil from Third-Party Supplier	Heaters and Boilers	For liquid fuel obtained from a third party supplier (i.e., not obtained from a North Slope topping unit) either: a. if the fuel grade requires a sulfur content less than 0.5% by weight keep receipts that specify fuel grade and amount; or b. if fuel grade does not require a sulfur content less than 0.5% by weight keep receipts that specify fuel grade and amount and i) test the fuel sulfur content; or ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery, including a statement signed by the suppler or refinery of what fuel they represent.	*Fuel Receipts/* *Lab Fuel Sulfur Analysis Reports* *CPAI keeps records of receipts from the third party supplier(s) of ULSD fuel burned by transportable drilling rigs operating under this permit.*	X		
3	9.5	Sulfur Compound Emissions - Fuel Oil from Third-Party Supplier	Heaters and Boilers	Fuel testing required by Condition 9.4 must follow an appropriate method listed in 18 AAC 50.035 or another method approved in writing by ADEC.	*Fuel Receipts/* *Lab Fuel Sulfur Analysis Reports*			X
3	9.6	Sulfur Compound Emissions - Fuel Oil from Third-Party Supplier	Heaters and Boilers	For liquid fuel not obtained from a North Slope topping unit, calculate SO2 emissions in PPM using either Section 14 or Method 19 of 40 CFR 60, App. A-7, adopted by reference in 18 AAC 50.040(a) if the fuel sulfur content exceeds 0.75% by weight.	*Fuel Receipts/* *Lab Fuel Sulfur Analysis Reports/* *Operating Reports*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
3	9.7a	Sulfur Compound Emissions - Fuel Oil from Third-Party Supplier	Heaters and Boilers	For liquid fuel not obtained from a North Slope topping unit, submit an Excess Emissions report if fuel sulfur content exceeds 0.75% by weight and calculated SO2 emissions exceed 500 ppm. Document the calculation in the excess emissions report.	*Fuel Receipts/* *EE Reports* *No reporting required during the certification period*			X
3	9.7b	Sulfur Compound Emissions - Fuel Oil from Third-Party Supplier	Heaters and Boilers	For liquid fuel not obtained from a North Slope topping unit, include the following in each Operating Report: i) a list of the fuel grades received at the stationary source during the reporting report ii) for any grade with a max. fuel sulfur content greater than 0.5%, the fuel sulfur content of each shipment; and iii) for fuel with a sulfur content greater than 0.75%, the calculated SO2 emissions in ppm.	*Fuel Receipts/* *Operating Reports*	X		
4	10	Fuel Usage Limits	All	Limit the total daily and aggregate rolling 12-month fuel usage based on the sulfur content of the liquid fuel burned as specified below. These limits apply to each well pad and are cumulative for any drilling and equipment listed in Table A of the permit that occurs during the time period set by the limit. - 19,500 gal (daily limit) at 0.15% sulfur by weight: - 14,600 gal (daily limit) at 0.20% sulfur by weight: - 11,700 gal (daily limit) at 0.25% sulfur by weight: - 1,450,000 gal (total rolling 12 month limit) at any sulfur content	*Rig Database*	X		
4	10.1	Fuel Usage Monitoring and Recordkeeping	All	Monitor and record the aggregated daily total and rolling 12 month total fuel use by all drill rig and support emission units for each well pad where drill rig operations occur under the permit.	*Rig Database*	X		

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
4	10.2	Fuel Usage Reporting	All	Report the aggregated daily and rolling 12 month total fuel use for all well pad locations where operations occur during the reporting period in the Operating Report.	*Rig Database/ Operating Reports*	X		
4	10.3	Fuel Usage Limits	All	Submit a Permit Deviation report if aggregate daily or rolling 12 month total fuel usage at any well pad location exceeds any of the limits in Condition 10.	*Recordkeeping/ Reports No reporting required during the certification period*			X
4	11	Drilling Locations	All	Operate drill rigs and support equipment only within the KRU Drilling Area specified in Section 1 of the permit.	*Rig Database*	X		
4	11	Drilling Locations	All	Do not operate at sales oil production pads (Drill Site 1B, excepted) within a Title V major source or at the KSTP unless written authorization is first obtained from ADEC.	*Rig Database/ Reasonable Inquiry*	X		
4	12	Allowed Drilling Rigs	All	Concurrently operate no more than 12 rigs (from the rigs listed in Section 11 of the permit) at authorized well pads.	*Rig Database*	X		
4	12.1	Allowed Drilling Rigs	All	Provide written notification to ADEC at least 7 days prior to commencing drilling with an alternate rig not listed in Section 11 of the permit.	*Rig Database/ Notification Letter No notifications required during the certification period*			X
4	12.1	Allowed Drilling Rigs	All	Alternative rigs may not exceed the fuel use, fuel sulfur limits, and allowable emissions listed in Sections 3 and 4 of the permit (Conditions 1, 5, 9, 10, and 14).	*Rig Database*	X		
4	13	Limit of Consecutive Months a Rig Can Remain at a Well Pad	All	Do not allow a drill rig or rig support equipment to remain at a well pad for more than 24 consecutive months without first obtaining approval from ADEC to extend beyond 24 months.	*Rig Database*	X		
4	13.1	Limit of Consecutive Months a Rig Can Remain at a Well Pad	All	Notify ADEC via email or fax when relocating a drilling rig to or from an authorized well pad.	*Recordkeeping/ Operating Reports*	X		

Title V Compliance Certification Report - Transportable Drilling Rigs - ConocoPhillips Alaska, Inc. Permit No. AQ0909TVP01 for the Reporting Period January 1 through September 30, 2018

Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
4	13.2	Limit of Consecutive Months a Rig Can Remain at a Well Pad	All	Provide a summary of drilling operations that were covered by the permit in the Operating Report, including the location (well pad) and duration (in total consecutive months) of each drilling activity that occurred or is occurring during the reporting period.	*Rig Database/ Operating Reports*	X		
4	13.3	Limit of Consecutive Months a Rig Can Remain at a Well Pad	All	Submit a Permit Deviation report if a drill rig or drilling support equipment remains at an individual drill site for more than 24 consecutive months.	*Rig Database/ PD Reports No reporting required during the certification period*			X
4	14	Liquid Fuel Sulfur Content	All	Do not use liquid fuel with a sulfur content greater than 0.25% by weight.	*Lab Fuel Sulfur Analysis Reports/ Fuel Vendor Receipts/ Operating Reports*	X		
4	14.1	Liquid Fuel Sulfur Content	All	Monitor, record, and report according to Condition 9.	*Lab Fuel Sulfur Analysis Reports/ Fuel Vendor Receipts/ Operating Reports*	X		
4	14.2	Liquid Fuel Sulfur Content	All	Submit a Permit Deviation/ Excess Emissions report if liquid fuel with a sulfur content greater than 0.25% by weight is used.	*Lab Fuel Sulfur Analysis Reports/ Fuel Vendor Receipts/ EE-PD Reports No reporting required during the certification period*			X
5	15.1, 16	Visible Emissions for IEUs	Insignificant Emission Units	Visible emissions from these emission units (excluding water vapor) must not exceed 20% for more than 3 minutes in any 1 hour or more than 20% averaged over 6 consecutive minutes.	*Monitoring not required. Reasonable Inquiry*	X		
5	15.1, 17	PM Standard for IEUs	Insignificant Emission Units	PM emitted from these emission units shall not exceed 0.05 gr/dscf of exhaust averaged over 3 hours.	*Monitoring not required. Reasonable Inquiry*	X		
5	15.1, 18	Sulfur Compound Emissions for IEUs	Insignificant Emission Units	Sulfur compound emissions from these emission units, expressed as SO2, shall not exceed 500 ppm averaged over 3 hours.	*Monitoring not required. Reasonable Inquiry*	X		
6	19	Standard Term	NA	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.	*Advisory Condition*	X		

Title V Compliance Certification Report - Transportable Drilling Rigs - ConocoPhillips Alaska, Inc. Permit No. AQ0909TVP01 for the Reporting Period January 1 through September 30, 2018

Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
6	20	Standard Term	NA	The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for any of these actions or a notification of planned changes or anticipated noncompliance does not stay any permit condition.	*Advisory Condition*	X		
6	21	Standard Term	NA	The permit does not convey any property rights of any sort, nor any exclusive privilege.	*Advisory Condition*	X		
6	22	Administration Fees	NA	Pay all assessed permit administration fees as set out in 18 AAC 50.400-405.	*All fees paid as assessed during the certification period*	X		
6	23, 24	Assessable Emissions	NA	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to ADEC by March 31.	*Fees are paid based on projected actual annual emissions estimates.* *Estimated actual emissions for fees were provided to ADEC via mail and email on or before March 31.*	X		
6	25a	Good Air Pollution Control	All	Perform regular maintenance considering manufacturer's or operator's maintenance procedures.	*Operator Logs*	X		
6	25b	Good Air Pollution Control	All	Keep records of any maintenance that would have a significant effect on emissions.	*Operator Logs*	X		
6	25c	Good Air Pollution Control	All	Keep a copy of manufacturer's or operator's maintenance procedures.	*O&M Manual*	X		
6	26	Dilution	All	Do not dilute emissions to comply with the permit.	*Reasonable Inquiry*	X		
6	27	Prevent Fugitive Dust	All	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable Inquiry*	X		

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
6	28	Stack Injection	All	Do 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.	*Reasonable Inquiry*	X		
6	15.2, 29	Air Pollution Prohibited	All	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Reasonable Inquiry*	X		
6	29.1	Air Pollution Prohibited	All	Report any emissions that present a potential threat to human health or safety by completing an Excess Emissions report.	*Reasonable Inquiry/ EE Reports* *No reporting required during the certification period*			X
6	29.2	Air Pollution Prohibited	All	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 29.	*No known complaints*			X
6	29.3	Air Pollution Prohibited	All	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if ADEC notifies CPAI that it has found a violation of Condition 29.	*No known complaints*			X
6	29.4	Air Pollution Prohibited	All	Keep records of: a. date, time, and nature of all emissions complaints received b. name of person that complained, if known c. summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation d. any corrective actions taken or planned for complaints attributable to stationary source emissions.	*No known complaints for the past 5 years*			X

Title V Compliance Certification Report - Transportable Drilling Rigs - ConocoPhillips Alaska, Inc. Permit No. AQ0909TVP01 for the Reporting Period January 1 through September 30, 2018

Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
6	29.5	Air Pollution Prohibited	All	Include a brief summary report with the Operating Report which contains: a. the number of complaints received b. number of times CPAI or ADEC found corrective action necessary c. number of times corrective action was taken within 24 hours d. status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports* *No known complaints*	X		
6	29.6	Air Pollution Prohibited	All	Notify ADEC of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*No known complaints*			X
6	30	Technology Based Emission Standard	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard.	*Recordkeeping* *Not applicable during the certification period*			X
6	30	Technology Based Emission Standard	NA	Give ADEC written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered.	*Recordkeeping* *Not applicable during the certification period*			X
6	31	Open Burning	NA	When conducting open burning: -keep materials dry -separate non-combustibles -assure natural or artificially induced draft is present -separate from grass or peat moss -do not allow to smolder.	*No open burning at the source during the certification period.* *No monitoring required.*			X
7	32	ADEC Requested Source Tests	All	Conduct source testing as requested by ADEC.	*Source testing not requested by ADEC during the certification period.*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
7	33-41	General Source Testing Requirements	All	Comply with the provisions of Section 7 of the permit when source tests are conducted.	*Recordkeeping* *Method 9 observations were completed according to the required provisions.* *No other source tests conducted during the certification period.*	X		
8	42	Recordkeeping Requirements	All	Keep copies of all reports, certifications, and monitoring required by Title V permit for at least 5 years after the date of collection.	*Recordkeeping*	X		
8	43	Certification	All	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping/* *Submitted Documents.*	X		
8	43.1	Certification	All	An electronic signature may be used if: a. a certifying authority registered under AS 09.25.510 verifies that the signature is authentic b. the person providing the signature has made an agreement with the certifying authority that the person accepts or agrees to be bound by an electronic record executed or adopted with that signature.	*Electronic signatures not used during the certification period*			X
8	44	Submittals	All	Send reports, compliance certifications and other documents to ADEC, Air Permits Programs, 610 University Ave., Fairbanks, AK 99709-3643 ATTB: Compliance Technician.	*Recordkeeping/* *Submitted Documents*	X		
8	44	Submittals	All	Electronic copies of data reports, source reports, or other records may be submitted upon consultation with Compliance Technician. Cover letter must be certified.	*Recordkeeping/* *Submitted Documents*	X		

Title V Compliance Certification Report - Transportable Drilling Rigs - ConocoPhillips Alaska, Inc. Permit No. AQ0909TVP01 for the Reporting Period January 1 through September 30, 2018

Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
8	45	Information Requests	All	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping*	X		
8	46.1a	Excess Emission and Permit Deviation Reports	All	Report emissions that present a potential threat to human health or safety and excess emissions that Permittee believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.1b	Excess Emission and Permit Deviation Reports	All	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology-based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.1c(i)	Excess Emission and Permit Deviation Reports	All	Report excess emissions and permit deviations not described in Conditions 46.1a, 46.1b, or 46.1c(ii)-(iii) within 30 days of end of month in which the emissions or deviation occurred or were discovered.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.1c(ii)	Excess Emission and Permit Deviation Reports	All	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.1c(iii)	Excess Emission and Permit Deviation Reports	All	Report excess emissions and permit deviations resulting from failure to monitor as required by applicable permit conditions.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.2	Excess Emission and Permit Deviation Reports	All	Report excess emissions and permit deviations using ADEC's online form or the form in Section 15 of the permit. Provide all information that is called for by the form that is used.	*Recordkeeping/ PD-EE Reports No reporting required during the certification period*			X
8	46.3	Excess Emission and Permit Deviation Reports	All	Provide more detailed written report when requested by ADEC.	*EE-PD Reports Information requests from ADEC*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
8	47	Operating Reports	All	Submit an original and one copy of a quarterly Operating Report by April 30 for January 1 to March 31, by July 30 for April 1 to June 30, by October 30 for July 1 to September 30 and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
8	47.1	Operating Reports	All	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports*	X		
8	47.2a	Operating Reports	All	If excess emissions or permit deviations occurred during the reporting period and not yet reported at the time of operating report submittal, identify: -date of deviation -equipment involved -permit condition affected -description of excess emissions or permit deviation -any corrective action or preventive measures taken and the date of such actions	*Operating Reports/ Records of EE-PD Events and Report Timing*			X
8	47.2b	Operating Reports	All	If excess emissions or permit deviations during the reporting period have already been reported, cite the date(s) of the report(s).	*Operating Reports/ Records of EE-PD Events and Report Timing No reporting required during the certification period*			X

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
9	48	Emissions Trading	All	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.	*Advisory Condition*	X		
9	49.1	Off Permit Changes	All	Each off permit change shall meet all applicable requirements and shall not violate any existing permit terms or conditions.	*Recordkeeping.* *No off-permit change notifications were made or required during the certification period.*			X
9	49.2	Off Permit Changes	All	Provide contemporaneous notice to EPA and ADEC of each off permit change (except for changes qualifying as insignificant under 18 AAC 50.326(d)-(i)).	*Recordkeeping.* *No off-permit change notifications were made or required during the certification period.*			X
9	49.4	Off Permit Changes	All	Keep a record describing the changes made 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.	*Recordkeeping.* *No off-permit change notifications were made or required during the certification period.*			X
9	50	Operational Flexibility	All	Changes to operation authorized by this permit may be made without requesting a permit revision if changes are not modifications under Title I and the changes do not exceed the emissions allowable under the permit.	*Advisory Condition*	X		
9	50.1, 50.2	Operational Flexibility	All	If a change to operations is made as allowed under Condition 50, provide written notification to EPA and ADEC no less than 7 days in advance of the change. Notification must include: - a brief description of the change - the date on which the change will occur - any change in emissions - any permit term or condition that is no longer applicable as a result of the change	*Recordkeeping.* *Not applicable during the certification period.*			X
9	51	Permit Renewal	All	Submit an application to renew Title V permit no sooner than May 29, 2011 and no later than May 29, 2012.	*Renewal application was submitted to the Department on May 25, 2012.*	X		

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Section	Condition	Description	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
						Continuous	Intermittent	Not Triggered
10	52	General Compliance Requirements	All	Compliance with permit terms and conditions is considered to be compliance with those requirements that are included and specifically identified in the permit or determined in writing in the permit to be inapplicable.	*Advisory Condition*	X		
10	53	General Compliance Requirements	All	Comply with each permit term and condition.	*Recordkeeping* *Compliance status is based on the status declared for all other permit conditions.*	X		
10	54	General Compliance Requirements	All	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.	*Advisory Condition*	X		
10	55	General Compliance Requirements	All	Allow the Department or a Department-authorized inspector to: - enter upon the premises where a emission unit subject to the permit is located or where records required by the permit are kept; - have access to and copy any records required by the permit; - inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and - sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.	*Recordkeeping* *No visits to sites where drilling occurred under this permit were conducted during the certification period.*			X
10	56	Annual Compliance Certification	All	- Submit an original and one copy of annual compliance certification report for the prior year by March 31. - Submit a copy of annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping.* *The certified annual compliance certification was sent to ADEC and EPA on or before March 31 and included all required documentation.*	X		

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 6
Alpine CPF 1Q-3Q

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through October 10, 2018

Air Quality Operating Permit No. AQ0489TVP02 (Interim Revision 2)

ConocoPhillips Alaska, Inc.

Alpine Central Processing Facility

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

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ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through October 10, 2018

Air Quality Operating Permit No. AQ0489TVP02 (Interim Revision 2)

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_____ _____

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

Date

ED_004016I_00012166-00159

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc.
Permit No. AQ0489TVP02 (Interim Revision 2) - for the Reporting Period January 1 through October 10, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	1	Visible Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 108, 109:*** *monitoring not required; reasonable inquiry* ***Diesel fuel-fired EU IDs 211, 212, 621, 622, 742 (heaters only), 839:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 415, 416:*** *reasonable inquiry* ***Flare EU ID 417:*** *did not operate during the certification period*	X		
3	1.1, 7.1	Visible Emissions & Particulate Matter	1-3, 5, 106, 107, 110, 518-520	Fuel-Fired Equipment	Burn only gas as fuel. State in each Operating Report that each of these emission units burned only gas.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas*	X		
					Submit a Permit Deviation report if any of these emission units burn any fuel other than gas.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	1.2, 7.2	Visible Emissions & Particulate Matter	211, 212, 621, 622	Diesel-Fired Equipment	If these emission units did not operate more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Compliance with visible emissions and particulate matter standards is certified based on reasonable inquiry for these units.*	X		
3	1.3	Visible Emissions	211, 212, 621, 622	Diesel-Fired Equipment	If these emission units operated more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitor, record, and report in accordance with Conditions 3 through 5 for the remainder of the permit term.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Monitoring not required.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc.
Permit No. AQ0489TVP02 (Interim Revision 2) - for the Reporting Period January 1 through October 10, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	1.4, 7.4	Visible Emissions & Particulate Matter	4, 108, 109	Dual Fuel-Fired Equipment	Include a statement in each operating report indicating whether each of these emission unts fired gas as the primary fuel during the period covered by the report.	*Recordkeeping/ Operating Reports* ***Dual fuel-fired EU IDs 4, 108 and 109*** *fired gas as the primary fuel during the certification period as stated in the Operating Reports.*	X		
					If these emission units operated on liquid fuel, but not more than 400 hours per calendar year, monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards, per Condition 13.1.	*Recordkeeping/ Operating Reports* ***Dual fuel-fired EU IDs 4 and 108*** *burned liquid fuel during the certification period but not more than 400 hours during the calendar year.* ***Dual fuel-fired EU ID 109*** *burned only gas during the certification period and during calendar year 2018.* *Compliance with the visible emissions and PM standards is certified based on reasonable inquiry for these units.*	X		
					If these emission units operated on liquid fuel for more than 400 hours per calendar year, monitor, record, and report according to Conditions 13.2, 13.3, and 13.4 (Method 9 observations).				X
3	1.5, 7.5	Visible Emissions & Particulate Matter	742 (heaters only), 839	Dual Fuel-Fired Equipment	Monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards based on reasonable inquiry.	***Diesel fuel-fired EU IDs 742 (heaters only) and 839:*** *Compliance with the visible emissions and PM standards is certified based on reasonable inquiry for these insignificant emissions units.*	X		
3	1.6	Visible Emissions	415, 416	Flares	Comply with Condition 18 and monitor, record, and report in accordance with Condition 6.	*Recordkeeping/ Operating Reports* ***Flare EU IDs 415 and 416:*** *Method 9 observations and reasonable inquiry.*	X		
3	1.7	Visible Emissions	417	Portable Flares	Monitor, record, and report in accordance with Condition 6.	*Recordkeeping/ Operating Reports* ***Flare EU ID 417*** *did not operate during the certification period.*			X
3	2	Visible Emissions	313, 314	Incinerators	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Incinerator EU IDs 313 and 314:*** *Method 9 observations and reasonable inquiry*	X		

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Interim Revision 2) - for the Reporting Period January 1 through October 10, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	2.1	Visible Emissions	313, 314	Incinerators	Perform a Method 9 visible emissions observation for each unit once per calendar year during which each unit operates, or upon request by the Department.	*Recordkeeping/ Operating Reports*	X		
3	2.2	Visible Emissions	313, 314	Incinerators	Record and report visible emissions observations in accordance with Conditions 4 and 5.	*Recordkeeping/ Operating Reports*	X		
3	3, 3.1	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If triggered under Condition 1.3 for any of these emission units, or in the event of replacement during the permit term, Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping*			X
3	3.1a(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If any of these emission units is replaced, conduct an initial Method 9 observation for 18 minutes within 30 days of startup.	*Recordkeeping* *None of these emissions units was replaced during the certification period.*			X
3	3.1a(ii)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If any of these emission units exceeds the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)], conduct an initial Method 9 observation for 18 minutes within 30 days after the calendar month during which that threshold has been exceeded, or during the next scheduled operation, whichever is later.	*Recordkeeping* *None of these emissions units exceeded its Method 9 operating hour threshold during the certification period.*			X
3	3.1b	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	Method 9 observations must be conducted at least once each calendar month that the emission unit operates after the initial Method 9 observation until the allowance in Condition 3.1c for reduced monitoring is satisfied.	*Recordkeeping*			X
3	3.1c(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	After observing emissions for three consecutive operating months under Condition 3.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions for 18 minutes within six months after the preceding observation until the allowance in Condition 3.1d for reduced monitoring is satisfied.	*Recordkeeping*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Interim Revision 2) - for the Reporting Period January 1 through October 10, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	3.1c(ii)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	For an emission unit with intermittent operations, the observation required under Condition 3.1c(i) must be taken during the next scheduled operation immediately following six months after the preceding observation.	*Recordkeeping*			X
3	3.1d(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	After completing at least two semiannual 18-minute observations under Condition 3.1c, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.	*Recordkeeping*			X
3	3.1d(ii)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	For an emission unit with intermittent operations, the observation required under Condition 3.1d(i) must be taken during the next scheduled operation immediately following twelve months after the preceding observation.	*Recordkeeping*			X
3	3.1e	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations is greater than 20 percent, increase and maintain monitoring frequency to monthly until the criteria in Condition 3.1c is met.	*Recordkeeping*			X
3	4, 4.1	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, record all data required by Condition 4.1 on the Visible Emissions Field Data Sheet in Section 11 of the permit.	*Recordkeeping*	X		
3	4.2	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, determine the six-minute average opacity as described in Condition 4.2.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	4.3	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conduction Method 9 observations, calculate and record the highest 6-minute and 18-consecutive-minute averages observed.	*Recordkeeping*	X		
3	5, 5.1	Visible Emissions Reporting	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, report all data required by Condition 5.1.	*Recordkeeping/ Operating Reports*	X		
3	5.2a	Visible Emissions EE Reporting	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	Submit an Excess Emissions report if the result of a Method 9 observation exceeds an average 20 percent for any six-minute period.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	5.2b	Visible Emissions PD Reporting	211, 212, 313, 314, 621, 622	Fuel-Fired Equipment	Submit a Permit Deviation report if monitoring required under Conditions 2.1 or 3 was not performed when required. Submit the report within three days of the date when monitoring was required.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	6, 6.1	Visible Emissions Monitoring	415-417	Flares	Observe one daylight flare event within 12 months after the preceding flare event observation or within 12 months after the permit effective date, whichever is later. Use Method 9.	*Recordkeeping* ***Flare EU IDs 415 and 416*** *- Method 9 observations (July 2018 - the next planned daylight flare events after the last such event in August 2016)* ***Flare EU ID 417*** *- Did not operate during the certification period.*			X
					If there is no flare event within that 12-month period, then the Permittee shall observe the next daylight flare event using Method 9.		X		

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							Continuous	Intermittent	Not Triggered
3	6.2	Visible Emissions Monitoring	415-417	Flares	For each observed flare event, record: 1) the flare emission unit ID number 2) results of the Method 9 observations 3) reason(s) for flaring 4) date, beginning and ending time of event 5) volume of gas flared.	*Recordkeeping*	X		
3	6.3	Visible Emissions Monitoring	415-417	Flares	If more than 12 months have elapsed since the last flare event was monitored, and monitoring was postponed, explain why the event was not monitored in the next Operating Report.	*Recordkeeping/ Operating Reports*			X
3	6.4	Visible Emissions Reporting	415-417	Flares	Include in the Operating Report copies of the records required by Condition 6.2.	*Operating Reports* *(Records required by Condition 6.2 for Method 9 observations completed in July 2018 were included with the 3Q 2018 Operating Report, which was submitted outside the certication period for the Interim Rev 2 permit.)*			X
3	6.5	Visible Emissions EE/PD Reporting	415-417	Flares	Submit an Excess Emissions report if Method 9 observation of the flares results in an average opacity >20 percent over any six consecutive minutes.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
					Submit an Permit Deviation report if the monitoring required under Condition 6 is not completed, except as allowed under Condition 6.3.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	7	Particulate Matter	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust gas corrected to standard Conditions and averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 108, 109:*** *monitoring not required; reasonable inquiry* ***Diesel fuel-fired EU IDs 211, 212, 621, 622, 742 (heaters only), 839:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 415, 416:*** *reasonable inquiry* ***Flare EU ID 417:*** *did not operate during the certification period*	X		

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							Continuous	Intermittent	Not Triggered
3	7.3	Particulate Matter	211, 212, 621, 622	Diesel-Fired Engines	If these emission units operated more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitor, record, and report PM emissions in accordance with Conditions 8 and 9, for that unit for the remainder of the permit term.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Monitoring not required.*			X
3	7.6	Particulate Matter	415-417	Flares	Annually certify these emission units were in compliance with the PM standard.	*Compliance certified based on reasonable inquiry.*	X		
3	8, 8.1, 8.2, 8.4	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Conduct a PM source test or repair equipment no later than 6 months after a Method 9 observation results in an 18-minute average opacity >20 percent. (For stacks with a diameter less than 18 inches, conduct a source test if the 18-minute average opacity is greater than 15% and not more than 20%, unless the Department has waived this requirement in writing.) (This requirement is waived if a PM source test on the unit has shown compliance with the PM standard during the permit term.)	*Method 9/ Recordkeeping* *PM source test not required during the certification period.*			X
3	8.1b	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	If repairs are made to correct an exceedance of the criteria in Condition 8.2, perform a Method 9 observation under similar load conditions as during the exceedance to ensure corrected performance.	*Method 9/ Recordkeeping* *Repairs not required during the certification period.*			X
3	8.3	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	During each PM source test, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.	*Not applicable. Monitoring not required.*			X

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							Continuous	Intermittent	Not Triggered
3	9.1a	PM EE Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Submit an Excess Emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	9.1b	PM PD Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Submit a Permit Deviation report if testing or repairs required under Condition 8.2 were not performed within 6 months of triggering the requirement. This report is due within one day after not meeting the 6-month deadline.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	9.2	PM Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Report observations in excess of the thresholds in Condition 8.2b within 30 days of end of month in which observations occur.	*Not applicable. Reporting not required.*			X
3	9.3	PM Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Include with each Operation Report: (i) The dates, EU ID(s), and results when an observed 18-minute average exceeded an applicable threshold in Condition 8.2 (15%/20%) (ii) A summary of the results of any PM testing under Condition 8; and (iii) Copies of any visible emissions observation results that exceed the thresholds in Condition 8.2, if not already submitted.	*Not applicable. There were no visible emissions observations for these units.* *PM source testing not required.*			X
3	10, 10.1, 10.2, 10.4	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	Conduct a PM source test or take corrective action (while firing liquid fuel) no later than 6 months after a Method 9 observation results in an 18-minute average opacity >20 percent. (This requirement is waived if a PM source test on the unit has shown compliance with the PM standard during the permit term.)	*Method 9/ Recordkeeping* *PM source test not required during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	10.1b	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	Take corrective action and conduct two 18-minute visible emissions observations in a consecutive six-month period to show that emissions no longer exceed the criteria described in Condition 10.2.	*Method 9/ Recordkeeping* *Corrective action not required during the certification period.*			X
3	10.3	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	During each PM source test, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.	*Not applicable. Monitoring not required.*			X
3	11	PM Recordkeeping	108, 109	Dual Fuel-Fired Heaters	Keep records of the results of any PM testing and visible emissions observations conducted under Condition 10.	*Not applicable. Monitoring not required.*			X
3	12.1	PM Reporting	108, 109	Dual Fuel-Fired Heaters	Include with each Operation Report: (i) The dates, EU ID(s), and results when an observed 18-minute average exceeded an applicable threshold in Condition 10.2 (20%) (ii) A summary of the results of any PM testing and visible emissions observations under Condition 10.	*Not applicable. Visible emissions observations not required.* *PM source testing not required.*			X
3	12.2	PM EE Reporting	108, 109	Dual Fuel-Fired Heaters	Submit an Excess Emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	13	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Monitor, record, and report the monthly hours of operation when operating on back-up liquid fuel.	*Recordkeeping/ Operating Reports*	X		
3	13.1	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	If each emission unit did not exceed 400 hours of operation on back-up liquid fuel during the calendar year, monitoring shall consist of annual certification of compliance with the visible emissions and PM standards.	*Recordkeeping/ Reasonable Inquiry* *None of these emission units operated more than 400 hours on liquid fuel during the certification period.* *Compliance with the visible emissions and particulate matter standards has been determined based on reasonable inquiry.*	X		

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							Continuous	Intermittent	Not Triggered
3	13.2	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Notify the Department and perform a Method 9 visible emissions observation 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 back-up liquid fuel or during the next scheduled operation on back-up liquid fuel, whichever is later.	*ADEC Notification/ Recordkeeping/ Method 9*			X
					If the observation exceeds the limit in Condition 1, monitor according to Condition 8.	*Not applicable. Monitoring not required.*			X
3	13.3	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	When required by Condition 13.2, conduct Method 9 observations when operating on back-up liquid fuel for a duration of 18 minutes to obtain 72 consecutive 15-second readings.	*Not applicable. Monitoring not required.*			X
3	13.4	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Record and report visible emissions observations and PM testing results in accordance with Conditions 4, 5, and 9.	*Not applicable. Monitoring not required.*			X
3	13.5	Visible Emissions and PM PD Reporting	4, 108, 109	Dual Fuel-Fired Units	Submit a Permit Deviatoin report if MR&R under Condition 13.2, 13.3, or 13.4 was not performed.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	14	Sulfur Compound Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Sulfur compound emissions from these emission units, expressed as SO_2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO_2 material balance*	X		

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							Continuous	Intermittent	Not Triggered
3	14.1	Sulfur Compound Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Comply with the liquid fuel sulfur content limit of 0.11 wt% sulfur (permit Condition 19) and the fuel gas H2S content limit of 200 ppmv (permit Condition 20).	*Recordkeeping/ Operating Reports*	X		
3	14.2	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, obtain from the plant the results of a monthly fuel sulfur analysis.	*Recordkeeping* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	14.2a	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, include a list of monthly measured fuel sulfur content results in the Operating Report.	*Operating Reports* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	14.2b	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, calculate SO_2 emissions in PPM using either the SO_2 material balance calculation in permit Section 12 or Method 19 of 40 CFR 60 Appendix A-7 if the fuel sulfur content exceeds 0.75% by weight.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X

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							Continuous	Intermittent	Not Triggered
3	14.2c	Sulfur Compound Emissions - EE Reporting for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, submit an Excess Emissions report if the SO2 emissions calculated under Condition 14.2b exceed 500 ppm, and include the calculation from Condition 14.2b.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	14.2d	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, report the calculated SO_2 emissions in PPM in the Operating Report for fuel with a sulfur content greater than 0.75% by weight.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	14.3	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	Comply with either Condition 14.3a or 14.3b for liquid fuel obtained from a third-party supplier.	*Recordkeeping* *CPAI complies with Condition 14.3a.*	X		
3	14.3a(i)	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, if the fuel grade requires a sulfur content less than 0.11 percent by weight, keep receipts that specify the fuel grade, maximum sulfur content of the fuel grade, and amount received.	*Recordkeeping* *ULSD fuel requires a sulfur content less than 0.11% by wt. Fuel shipment receipts are maintained.*	X		

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							Continuous	Intermittent	Not Triggered
3	14.3a(ii)	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, comply with Condition 14.3b or, if the fuel grade does not require a sulfur content less than 0.11 percent by weight, keep receipts that specify the fuel grade and amount received, and (A) test the fuel for sulfur content using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17; 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.	*Recordkeeping* *Not required - Alpine burns ULSD fuel which requires a sulfur content less than 0.11% by wt.*			X
3	14.3b	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, analyze at least monthly the sulfur content of the fuel in each storage tank that supplies fuel for use by these units using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17.	*Recordkeeping* *CPAI has elected to comply with Condition 14.3a(i).*			X
3	14.4	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, if a shipment of fuel under Condition 14.3a contains greater than 0.75 percent sulfur by weight or the results of the sample analyses under Condition 14.3b indicate that the stored fuel contains greater than 0.75 percent sulfur by weight, calculate SO2 emissions in ppm using either the Material Balance Calculation shown in Section 12 of the permit or Method 19 of 40 C.F.R. 60, Appendix A-7.	*Recordkeeping*			X
3	14.5a	Sulfur Compound Emissions - EE Reporting for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, submit an Excess Emissions report if the SO2 emissions calculated under Condition 14.4 exceed 500 ppm, and include the calculation from Condition 14.4.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	14.5b	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, include in Operating Reports: (i) a list of the fuel grades received; (ii) for any fuel grade with a maximum fuel sulfur content greater than 0.11% by weight, the fuel sulfur content of each shipment; (iii) the results of all fuel sulfur analyses conducted under Condition 14.3 and documentation of the method(s) used to complete the analyses; and (iv) for fuel with a sulfur content greater than 0.75 percent, the SO2 emissions in ppm calculated under Condition 14.4.	*Operating Reports*	X		
3	14.6a	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415, 416, 518-520	Fuel Gas Burning Equipment	Analyze a representative sample of the fuel gas at least monthly to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 CFR 60.17.	*Recordkeeping/ Operating Reports* *Analysis Method: ASTM D4810-06*	X		
3	14.6b	Sulfur Compound Emissions - for Fuel Gas	417	Portable Flares	Analyze a sample of the fuel gas burned by EU ID 417 at least once in any month that any portable flare operates using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 CFR 60.17.	*Recordkeeping/ Operating Reports* *Portable flares did not operate during the certification period.*			X
3	14.7a	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415, 416, 518-520	Fuel Gas Burning Equipment	Keep records of the fuel gas sulfur analyses conducted under Condition 14.6.	*Recordkeeping*	X		
3	14.7b	Sulfur Compound Emissions - for Fuel Gas	417	Portable Flares	Keep records of each month that any portable flare authorized by the permit operates.	*Recordkeeping*	X		
3	14.8a	Sulfur Compound Emissions - EE Reporting for Fuel Gas	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Submit an Excess Emissions report if sulfur compound emissions, expressed as SO2, from any emission unit exceeds 500 ppm averaged over 3 hours, or the H2S content exceeds a limit in Table D (Condition 15), Table E (Condition 16), or Condition 20, as applicable to each unit.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	14.8b	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Include copies of the fuel gas sulfur analysis records required by Condition 14.7 with the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	15	Turbine BACT	1, 2	Turbines	Install LHE liners and implement good operational practices to minimize emissions.	*Vendor specifications and good operational practices*	X		
3	15	Turbine BACT	3, 4, 5	Turbines	Install dry low NOx combustors and implement good operational practices to minimize emissions.	*Vendor specifications and good operational practices*	X		
3	15	Turbine BACT Emission Limits	1-5	Turbines	Actual emissions from turbines shall be limited as indicated in Table D of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data/ load limitation, installation of BACT controls, low sulfur fuels, good operational practices and parametric monitoring.*	X		
3	15.1	Turbine BACT	1-5	Turbines	Maintain records that are available for inspection demonstrating that these units are maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		
3	15.2a(i)	Turbine BACT (NOx and CO Stack Testing)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Except as specified in Condition 15.2a(ii), conduct NOx and CO source tests. Record the turbine intake temperature and load throughout each run. Source test reports shall provide the average load and average intake temperature for each test run, NOx and CO emissions in lb/hr, NOx emissions in ppmvd corrected to 15% O2 ISO conditions, and CO emissions in ppmvd for each load tested.	*Source test reports*	X		
3	15.2a(ii), 15.2a(iii)	Turbine BACT (NOx and CO Stack Testing)	1	Injection Turbine (C1)	When operated more than 167 hours in any consecutive 12-month period at 50% < load <= 60% and turbine intake temperature < 0 °F, conduct a winter CO source test in accordance with Condition 40 to demonstrate compliance with short-term BACT CO emission limit of 120 lb/hr @ 50% < load <= 60% & turbine intake temperature < 0 °F. Record turbine intake temperature and load throughout each run. The source test report shall provide the average load and average intake temperature for each test run, and CO emissions in lb/hr and ppmvd.	*Recordkeeping* *The operating threshold in this condition was not exceeded during the certification period.* *No monitoring required.*			X
3	15.2b(i)	Turbine BACT (NOx Stack Testing)	4, 5	Solar Turbines (S1 & S2)	Conduct NOx source tests for each fuel type (rich fuel gas and liquid fuel). Monitor and record the fuel consumption rate and electrical power-generating rate during each test run, and include the recorded operation data with the stack emissions test report. The source test reports shall provide NOx emissions in lb/hr and ppmv corrected to 15% O2.	*Source test reports*	X		

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							Continuous	Intermittent	Not Triggered
3	15.2b(ii)	Turbine BACT (CO Stack Testing)	4, 5	Solar Turbines (S1 & S2)	Conduct summer CO source tests while operating in low emissions mode and winter CO source test. Determine the CO emission rate and concentration for each fuel type (rich fuel gas and liquid fuel), using exhaust properties determined by both Method 19 and exhaust gas measurements. Monitor and record the fuel consumption rate and electrical power-generating rate during each test run, and include the recorded operation data with the stack emissions test report. Source test reports provide CO emissions in lb/hr and ppmv corrected to 15% O2.	*Source test reports*	X		
3	15.2b(iii)	Turbine BACT (NOx and CO Stack Testing)	4	Solar Turbine (S1)	Conduct NOx and CO source tests on backup liquid fuel within 12 months of exceeding 400 hours of operation in a calendar year on liquid fuel, and if the latest test results were less than or equal to 90 percent of the applicable limit in Table D of the permit and it also has been four years or more since a source test while firing liquid fuel was completed.	*Recordkeeping* *Operating time threshold on liquid fuel not exceeded during the certification period.* *Monitoring not required.*			X
3	15.2c	Turbine BACT (Fuel Gas H2S MR&R)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Monitor, record, and report the fuel gas sulfur content in accordance with Conditions 14.6 through 14.8 to demonstrate compliance with short-term turbine BACT SO2 emission limits in Table D of the permit.	*Recordkeeping/ Operating Reports* *Monitoring according to Condition 14.6*	X		
3	15.2d	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Conduct annual visible emission observations, the first to be completed within 12 months of the effective date of the permit to demonstrate compliance with the short-term turbine BACT PM (opacity) emission limit in Table D of the permit.	*Recordkeeping/ Method 9*	X		
3	15.2d(i), 15.2d(ii)	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Conduct subsequent visible emission observations within 12 months after the preceding observation. If the unit has intermittent operations, subsequent visible emission observations may be completed during the next scheduled operation immediately following the preceding observation.	*Recordkeeping/ Method 9*	X		

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							Continuous	Intermittent	Not Triggered
3	15.2d(iii)	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Record and report as required by Conditions 4 and 5 except report results compared to the 10 percent opacity BACT limit, in addition to the 20 percent opacity limit of Condition 1.	*Recordkeeping/ Operating Reports*	X		
3	15.3	Turbine BACT EE Reporting	1-5	Turbines	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	15.4	Turbine BACT Limits	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Monitor, record, and report in accordance with Condition 15.4 to demonstrate compliance with the annual BACT CO emission limits in Table D of the permit.	*Good Combustion Practices/ Recordkeeping/ Parametric Monitoring/ Operating Reports*	X		
3	15.4a	Turbine BACT Recordkeeping	1	Injection Turbine (C1)	When using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 15.4d(ii), use a 1-hour averaging period for loads above 40 percent, except during start-up and shutdown. During start-up and shutdown, use a time weighted 3-hour averaging period for loads above 40 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period.	*Recordkeeping*	X		
3	15.4b	Turbine BACT Recordkeeping	2	Generator Turbine (E1)	When using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 15.4d(ii), use a 1-hour averaging period for loads above 10 percent, except during start-up and shutdown. During start-up and shutdown, use a time weighted 3-hour averaging period for electrical loads above 10 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period.	*Recordkeeping*	X		
3	15.4c	Turbine BACT Recordkeeping	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	During Startup, Shutdown, Malfunctions, mapping of EU ID 3, and for loads not included in Table D of the permit (C1 load <= 40%, E1 load <= 10%, E2 load <= 40%), use the following CO emission rates for calculating the 12-month rolling emissions: (i) 884 lb/hr for EU ID 1; (ii) 145 lb/hr for EU ID 2; and (iii) 14.6 lb/hr for EU ID 3. (turbine mapping per permit AQ0489MSS07, Condition 15.2n)	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	15.4d	Turbine BACT Recordkeeping	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Calculate and record the annual (consecutive 12-month) CO emissions for each of EU IDs 1 through 3 as follows: (i) Determine the time each unit operates each month within the unit-specific load ranges provided in Table D of the permit. (ii) Multiply the monthly load-specific operating times by the corresponding unit-specific, load-based hourly emission rates using the predictive emissions correlation for the specific unit, or the unit-specific emission rates from either Table D of the permit or Condition 15.4c, as applicable, and sum the various calculated load-based emission rates to obtain a monthly total CO emission rate for each of EU IDs 1, 2, and 3.	*Recordkeeping* *Emissions are calculated using the predictive emissions correlation that applies to each turbine.*	X		
					(iii) Determine the 12-month rolling total CO emissions for each of EU IDs 1 through 3 by summing the calculated total monthly unit-specific CO emission rates from Condition 15.4d(ii) to the unit-specific emission rates calculated for the previous 11-months.	*Recordkeeping/ Operating Reports*	X		
3	15.4e	Turbine BACT Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Include in the Operating Report the monthly and the consecutive 12-month summation of CO emissions recorded in Condition 15.4d for each of EU IDs 1 through 3 for each month of the reporting period.	*Operating Reports*	X		
3	15.5a	Turbine BACT EE Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Submit an Excess Emissions report if the consecutive 12-month summation of CO emissions from any of EU IDs 1 through 3 exceed the annual emission limit in Table D of the permit.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	15.5b	Turbine BACT Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If the consecutive 12-month summation of CO emissions from any of EU IDs 1 through 3 exceed the annual emission limit in Table D of the permit, perform a revised BACT analysis on each turbine that exceeds an annual BACT limit and submit a copy to the Department of the analysis within 90 days of discovery of the exceedance.	*Revised BACT Analysis* *No excess emissions during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	15.6a	Turbine BACT (Low Load CO Operational Restrictions)	1	Injection Turbine (C1)	Do not operate the turbine at less than 40 percent load except during start-up, shutdown, and process upsets.	*Recordkeeping*	X		
					During start-up, shutdown, and process upsets, operation below 40 percent load shall be limited to 90 minutes per event.	*Recordkeeping*	X		
3	15.6b	Turbine BACT (Low Load CO Operational Restrictions)	2	Generator Turbine (E1)	Do not operate the turbine at less than 10 percent electric load except during start-up, shutdown, and process upsets.	*Recordkeeping*	X		
					During start-up, shutdown, and process upsets, operation below 10 percent electrical load shall be limited to 60 minutes per event.	*Recordkeeping*	X		
3	15.6c	Turbine BACT (Low Load CO Operational Restrictions)	3	Generator Turbine (E2)	Do not operate the turbine at less than 40 percent electric load except during start-up, shutdown, process upsets, and during mapping of the turbine.	*Recordkeeping*	X		
					During start-up, shutdown, and process upsets, operation below 40 percent electrical load shall be limited to 60 minutes per event.	*Recordkeeping*	X		
					This condition was updated in permit AQ0489MSS07, which was issued on February 19, 2016. The permit added a time limit for turbine mapping for EU ID 3 to Condition 15.6c of permit AQ0489TVP02, as follows: During mapping, operation below 40 percent electrical load shall be limited to 180 minutes per event.	*Recordkeeping*	X		
3	15.6d	Turbine BACT (Low Load CO Operational Restrictions)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Document in the Operating Report all process upsets that result in any turbine operating at less than the loads specified in Conditions 15.6a, 15.6b, and 15.6c for EU IDs 1, 2, and 3, respectively. Each report includes the cause of the upset, the duration of the upset, and what action was taken to minimize CO emissions.	*Recordkeeping/ Operating Reports*	X		
3	15.6e	Turbine BACT (Low Load CO Operational Restrictions)	3	N-P PGT10+ Turbine (E2)	Keep a record of the date, start time, and end time when mapping occurs for EU ID 3. *This condition incorporates the language in Minor Permit AQ0489MSS07 Condition 15.2p.*	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	15.7a	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Except during transient operations of startup and shutdown of EU IDs 2, 4, or 5, turbine intake temperatures less than 0°F, periods of emissions testing, and periods when EU IDs 4 or 5 operate in lead (isochronous) mode due to EU ID 2 being out of service, the Permittee shall operate EU ID(s) 4 and 5 out of low emissions mode for no more than 48 hours in any consecutive 12-month period.	*Recordkeeping*	X		
3	15.7b	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Do not operate the turbines in lead (isochronous) mode while EU ID 2 is operating, except during startup and shutdown of EU ID 2 or during required emissions testing.	*Recordkeeping*	X		
3	15.7c	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Monitor the pilot valve command signal to verify operation in low emissions mode. For each turbine, record the date, time, and duration; turbine intake temperature; gas producer speed; T5 temperature; power level; and whether each occurance is due to startup, shutdown, subzero turbine intake temperatures, periods of required emission testing, or load change when either of these emission units is in lead (isochronous) mode due to EU ID 2 being out of service or out of lead (droop) mode.	*Recordkeeping*	X		
3	15.7d	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Summarize in the Operating Report the monthly total time and consecutive 12-month total time that each of EU IDs 4 and 5 operate out of low emissions mode for each month of the reporting period. Include in the report the information recorded under Condition 15.7c for each event of operations out of low emissions mode during the reporting period.	*Operating Reports*	X		
3	15.7e	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Monitor and record the date, time and unit number for periods when these emission units burn rich fuel gas.	*Recordkeeping*	X		
3	15.7f	Turbine BACT (NOx BACT Operational Requirements)	4	Solar Taurus (S1)	Monitor and record the date, time, and unit number for periods when this emission unit burns liquid fuel.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	15.7g	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 15.7c shows that pilot valve movement to the intermediate or full open position (operation out of low emissions mode) exceeds 48 hours in any 12 consecutive month period other than during exceptions listed (see permit Condition 15.7g), within 90 days of exceeding 48 hours, propose corrective action to overcome operation out of low emissions mode and monitor process parameters hourly and calculate the NOx concentration using a predictive correlation developed and approved by the department under Condition 15.8 and as revised based on results of any annual relative accuracy (RA) stack test required by Condition 15.8b.	*Recordkeeping - not triggered*			X
3	15.8a	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	For any of these emission units, if the Permittee elects to develop load-based CO emission rates using a predictive emissions correlation (as allowed under Condition 15.4d(ii)), develop a predictive correlation between CO emission rates from stack tests and turbine process parameters as outlined in Conditions 15.8a(i) - (v).	*Recordkeeping* *In 2005, CPAI developed a predictive CO emissions correlation and submitted it to the Department during preparation of the application to revise the CO BACT limits established under permit AQ0489CPT08. The application resulted in issuance of permit AQ0489MSS03.* *During a March 14, 2017 conference call on the topic of the CO PEMS for EU IDs 1, 2, 3, the Department agreed that the 2005 submittal and the Departments's subsequent acceptance of the predictive CO emissions correlation and incorporation of the emissions correlation into permit AQ0489MSS03 satisfy the notification, source testing, submittal, and approval requirements of Conditions 15.8a(i), 15.8a(ii) and 15.8a(iii).*	X		
3	15.8a(i)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 15.8a, notify the Department of intention to develop a predictive correlation for emission monitoring, and submit a stack test plan to the Department, that includes: (A) identification of the proposed process parameters for which the Permittee elects to measure a parametric monitoring correlation, and (B) a description of the monitoring methodology accuracy and precision of methodology and sampling rates of each parameter.	*Recordkeeping* *See Method statement for Condition 15.8a.*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	15.8a(ii)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 15.8a, if stack testing has not occurred within 24 months preceding the time when the Permittee elects to use a CO emissions predictive correlation method, conduct Reference Method (RM) stack tests in accordance with permit Section 6 at four load settings specified in 40 CFR 60.335(b)(2) on the emission unit(s) (EU ID 1, 2, and/or 3) for which the correlation is to be developed. (The results of a stack test conducted in the previous 24 months may be substituted provided the test meets the RM requirements and is approved by the Department.)	*Recordkeeping* *See Method statement for Condition 15.8a.*	X		
3	15.8a(ii)(A)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	During the RM stack tests required under Condition 15.8a(ii), collect and record the process parameters identified in Condition 15.8a(i)(A) for the purpose of developing parametric correlations for CO emission rates.	*Recordkeeping* *See Method statement for Condition 15.8a.*	X		
3	15.8a(ii)(B)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Using the RM stack tests results from Condition 15.8a(ii), develop predictive correlations for emission rates based on turbine process parameters (the correlation may be based on vendor data as well as RM stack tests).	*Recordkeeping* *See Method statement for Condition 15.8a.*	X		
3	15.8a(iii)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Within 60 days after completing the RM tests, submit to the Department for written approval a report that describes the predictive correlation development or revision, including the methodology, assumptions, analysis (with sample calculations), supporting notes, and a list of all process parameters used in the correlations with an analysis of their statistical relevance for the correlation (i.e., an r^2 analysis of curve fit)	*Recordkeeping* *See Method statement for Condition 15.8a.*	X		

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							Continuous	Intermittent	Not Triggered
3	15.8a(iv)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Develop QA procedures for the process parameters used in the correlation developed under Condition 15.8a(ii)(B).	*Recordkeeping* *** These conditions do not include a deadline for completing the QA procedures or a deadline for submitting the procedures with an Operating Report.* *We have not declared "Continuous Compliance" because the required steps have not yet been completed.* ***CPAI intends to submit the QA procedures document to ADEC by June 30, 2019.*** *"Not triggered" does not apply since the requirements to develop and submit QA procedures have been triggered.* *Finally, "Intermittent Compliance" does not apply because there are no deadlines in the conditions for completing the QA procedures or submitting them to ADEC with an Operating Report.*	**		
3	15.8a(v)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Include copies of the QA procedures for the process parameters used in the correlation developed under Condition 15.8a(ii)(B) in the Operating Report.		**		
3	15.8b	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	For any of these emission units, if the Permittee elects to develop load-based CO emission rates using a predictive emissions correlation (as allowed under Condition 15.4d(ii)), the Permittee shall determine the RA of all correlations approved under Condition 15.8a annually in accordance with Conditions 15.8b(i) - (ii).	*Recordkeeping* *The relative accuracy of the CO predictive emissions correlations used by CPAI for EU IDs 1, 2, and 3 has been determined based on source testing completed in October 2017 for these units.* *CPAI submitted a Title V permit modification application on 9/12/2017 that included a request to reduce the required frequency of future RA tests. The final Rev 2 permit was issued in September 2018. It included a reduction in the required frequency for future RA testing.*	X		

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							Continuous	Intermittent	Not Triggered
3	15.8b(i)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 15.8b, no more than 12 months after the previous series of RM tests conducted in accordance with Condition 15.8a(ii), conduct RM tests for CO as follows: (A) conduct RM stack tests at four load settings specified in 40 CFR 60.335(b)(2) on the turbine for which a predictive correlation has been developed and approved; (B) record each statistically relevant process parameter during each RM stack test no less than once every 15 minutes. Mark the beginning and end of each RM stack test on the output record; (C) record the CO emission concentrations in ppm for each RM stack test period ("RM value"); and (D) determine the integrated average CO concentration in ppmv corrected to 15% O2 for each RM test period using the best fit correlations approved under Condition 15.8a.	*Recordkeeping* *CPAI submitted a Title V permit modification application on 9/12/2017 that included a request to reduce the required frequency of the RM tests. The final Rev 2 permit was issued in September 2018 that incorporated this request.* *The Rev 2 became effective 10/11/2018 (before the source test deadline in the Rev 1 permit). The testing under the Rev 1 permit was no longer required under the Rev 2 permit.* *Since the source test deadline was not missed under the Rev 1 permit, continuous compliance is declared.*	X		
3	15.8b(ii)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 15.8b, calculate the relative accuracy of a correlation compared to the RM test as follows: (A) make a direct comparison of the RM value and the correlation value; (B) using the procedures in 40 CFR 60, Appendix B, Section 12 of Performance Specification 2, summarize the results on a data sheet similar to that shown in Section 18 of PS2 and calculate the: (1) arithmetic mean of the difference betwee the "RM value" and the "correlation value", (2) standard deviation, (3) confidence coefficient, and (4) relative accuracy.	*Recordkeeping*	X		
3	15.8b(iii)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Attach copies of the results of all RM tests (including any rejected test results) conducted under Condition 15.8b(i), to the Operating Report	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	15.8b(iv)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If RA test results under Condition 15.8b(ii) for the Department approved correlation exceed the values in 40 CFR 60, Appendix B, Section 13.2 of Performance Specification 2, revise the predictive correlation.	*Source test reports* *CPAI submitted a Title V permit modification application on 9/12/2017 that included a request to revise the conditions under which revised predictive correlations must be submitted. The final Rev 2 permit was issued in September 2018 that incorporated this request. Therefore, CPAI declares continuous compliance with this condtion during the Rev 2 Interim permit certification period.*	X		
3	15.8a	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 15.7g shows that pilot valve movement to the intermediate or full open position exceeds 48 hours in any 12 consecutive month period other than due to exceptions listed (see permit Condition 15.7g), develop a predictive correlation between NOx emission rates from stack tests and turbine process parameters as outlined in Conditions 15.8a(i) - (v).	*Recordkeeping*			X
3	15.8a(i)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 15.8a, notify the Department of intention to develop a predictive correlation for emission monitoring, and submit a stack test plan to the Department, that includes: (A) identification of the proposed process parameters for which the Permittee elects to measure a parametric monitoring correlation, and (B) a description of the monitoring methodology accuracy and precision of methodology and sampling rates of each parameter.	*Recordkeeping*			X
3	15.8a(ii)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 15.8a, if stack testing has not occurred within 24 months preceding triggering of the predictive correlation method, conduct Reference Method (RM) stack tests in accordance with permit Section 6 at four load settings specified in 40 CFR 60.335(b)(2) on either of these emission units. Conduct testing with the pilot valve at minimum, intermediate, and full open position to gather emissions information while operating in and out of low emissions mode. (The results of a stack test conducted in the previous 24 months may be substituted provided the test meets the RM requirements and is approved by the Department.)	*Recordkeeping/ Source Test Reports*			X

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							Continuous	Intermittent	Not Triggered
3	15.8a(ii)(A)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	During the RM stack tests required under Condition 15.8a(ii), collect and record the process parameters identified in Condition 15.8a(i)(A) for the purpose of developing parametric correlations for NOx emission rates.	*Recordkeeping/ Source Test Reports*			X
3	15.8a(ii)(B)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Using the RM stack tests results from Condition 15.8a(ii), develop predictive correlations for emission rates based on turbine process parameters (the correlation may be based on vendor data as well as RM stack tests).	*Recordkeeping/ Source Test Reports*			X
3	15.8a(iii)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Within 60 days after completing the RM tests, submit to the Department for written approval a report that describes the predictive correlation development or revision, including the methodology, assumptions, analysis (with sample calculations), supporting notes, and a list of all process parameters used in the correlations with an analysis of their statistical relevance for the correlation (i.e., an r^2 analysis of curve fit)	*Recordkeeping/ Predictive Correlation Report*			X
3	15.8a(iv)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Develop QA procedures for the process parameters used in the correlation developed under Condition 15.8a(ii)(B).	*Recordkeeping/ Predictive Correlation Report*			X
3	15.8a(v)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Include copies of the QA procedures for the process parameters used in the correlation developed under Condition 15.8a(ii)(B) in the Operating Report.	*Recordkeeping/ Operating Report*			X
3	15.8b	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 15.7g shows that pilot valve movement to the intermediate or full open position exceeds 48 hours in any 12 consecutive month period other than due to exceptions listed (see permit Condition 15.7g), the Permittee shall determine the RA of all correlations approved under Condition 15.8a annually in accordance with Conditions 15.8b(i) - (ii).	*Recordkeeping/ RA tests*			X

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							Continuous	Intermittent	Not Triggered
3	15.8b(i)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 15.8b, no more than 12 months after the previous series of RM tests conducted in accordance with Condition 15.8a(ii), conduct RM tests for NOx as follows: (A) conduct RM stack tests at four load settings specified in 40 CFR 60.335(b)(2) on the turbine for which a predictive correlation has been developed and approved; (B) record each statistically relevant process parameter during each RM stack test no less than once every 15 minutes. Mark the beginning and end of each RM stack test on the output record; (C) record the NOx emission concentrations in ppm for each RM stack test period ("RM value"); and (D) determine the integrated average NOx concentration in ppmv corrected to 15% O2 for each RM test period using the best fit correlations approved under Condition 15.8a.	*Recordkeeping/ Source Test Reports*			X
3	15.8b(ii)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 15.8b, calculate the relative accuracy of a correlation compared to the RM test as follows: (A) make a direct comparison of the RM value and the correlation value; (B) using the procedures in 40 CFR 60, Appendix B, Section 12 of Performance Specification 2, summarize the results on a data sheet similar to that shown in Section 18 of PS2 and calculate the: (1) arithmetic mean of the difference betwee the "RM value" and the "correlation value", (2) standard deviation, (3) confidence coefficient, and (4) relative accuracy.	*Recordkeeping/ RA tests*			X
3	15.8b(iii)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	Attach copies of the results of all RM tests (including any rejected test results) conducted under Condition 15.8b(i), to the Operating Report	*Recordkeeping/ Operating Reports*			X
3	15.8b(iv)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If RA test results under Condition 15.8b(ii) for the Department approved correlation exceed the values in 40 CFR 60, Appendix B, Section 13.2 of Performance Specification 2, revise the predictive correlation.	*Recordkeeping/ RA tests*			X

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							Continuous	Intermittent	Not Triggered
3	15.8c	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	After operating with the predictive correlation required by Condition 15.7g for 24 months, the Permittee may discontinue use of the predictive correlation upon showing that pilot valve movement to the intermediate or full open position does not exceed 48 hours in any consecutive 12 month period other than due to a startup, shutdown, subzero turbine intake temperatures, periods of emission testing, load change when these emission units operate in lead (isochronous) mode due to EU ID 2 being out of service, or startup and shutdown of EU ID 2.	*Recordkeeping*			X
3	15.9a	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Except during startup, shutdown, and periods of required emission testing, limit operation of EU IDs 4 and 5 at less than 45 percent load to no greater than 316 combined hours in any 12 consecutive months.	*Recordkeeping*	X		
3	15.9b	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Calculate the 12-month combined rolling total operating time at less than 45 percent load, excluding operating during startup, shutdown, and periods of required emission testing.	*Recordkeeping*	X		
3	15.9c	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Report the 12-month combined rolling total hours calculated in Condition 15.9b in the Operating Report for each month of the reporting period.	*Operating Reports*	X		
3	15.9d	Turbine BACT (CO BACT PD Reporting)	4, 5	Solar Turbines (S1 & S2)	Submit a Permit Deviation report if operation of EU IDs 4 and 5 combined exceeds operation 45 percent load for more than 316 combined hours in any 12 consecutive months.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	16	Heater and Boiler BACT	106-109, 518	Heaters and Boilers	Install low NOx burners on these heaters.	*Vendor specifications*	X		
3	16	Heater and Boiler BACT	106-109, 518, 839	Heaters and Boilers	Implement good operational practices to minimize emissions from these heaters and boilers.	*Recordkeeping / good operational practices.*	X		
3	16	Heater and Boiler BACT Emission Limits	106-109, 518, 839	Heaters and Boilers	Actual emissions from these heaters shall be limited as indicated in Table E of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data, installation of BACT controls, low sulfur fuels, and good operational practices.*	X		
3	16.1	Heater and Boiler BACT	106-109, 518, 839	Heaters and Boilers	Maintain records that are available for inspection demonstrating that these units are maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	16.2a(i)	Heater and Boiler BACT (NOx and CO Stack Testing)	106-109, 518	Heaters and Boilers	Conduct NOx and CO source tests for these units while fired on fuel gas, and record and report results in accordance with Section 6 of the permit. Conduct each set of tests within 12 months after the permit effective date and once every five years thereafter. Conduct the tests at the highest typical operating load of the unit. Substituting test data between units operated by CPAI at stationary sources at the Alpine Field is allowed if CPAI documents the intent to substitute testing for multiple heaters and meets all other requirements of Conditions 40.1b(i) through 40.1b(iii) as they would apply to these units and to the limits in Table E of the permit. Provide with the source test report NOx and CO emissions in lb/MMBtu for the emission unit tested.	*Recordkeeping/ Source Test Reports*	X		
3	16.2a(ii)	Heater and Boiler BACT (NOx and CO Stack Testing)	108, 109	Thermoflux UHM Heaters	Conduct NOx and CO source tests for either EU ID 108 or 109 while fired on backup liquid fuel, and record and report results in accordance with Section 6 of the permit. (A) Conduct the tests while firing backup liquid fuel within 12 months of exceeding 400 unit-hours of operation in a calendar year on liquid fuel, except as allowed under Condition 16.2a(ii)(B). (B) Testing while firing backup liquid fuel is not triggered under Condition 16.2a(ii)(A) if the latest test results on backup liquid fuel were less than or equal to 90 percent of each of the applicable limits in Table E of the permit and it has been less than four years since the latest backup liquid fuel source test on a given unit.	*Recordkeeping/ Source Test Reports* *These heaters did not exceed 400 unit-hours of operation on backup liquid fuel during the certification period.*			X
3	16.2b	Heater and Boiler BACT Limits	106-109, 518	Heaters and Boilers	Monitor, record, and report in accordance with Conditions 14.6 through 14.8 to demonstrate compliance with the short-term BACT SO2 limit for fuel gas in Table E of the permit.	*Recordkeeping/ Operating Reports*	X		
			108, 109		Monitor, record, and report in accordance with Conditions 14.2 or 14.3 and 14.5 to demonstrate compliance with the short-term BACT SO2 limit for liquid fuel in Table E of the permit.	*Recordkeeping/ Operating Reports*	X		
3	16.2c	Heater and Boiler BACT (Opacity Readings)	106-109, 518	Heaters and Boilers	Conduct annual visible emission observations while fired on fuel gas, the first to be completed within 12 months of the effective date of the permit to demonstrate compliance with the short-term turbine BACT PM (opacity) emission limit in Table E of the permit.	*Recordkeeping/ Method 9*	X		
3	16.2c(i), 16.2c(ii)	Heater and Boiler BACT (Opacity Readings)	106-109, 518	Heaters and Boilers	Conduct subsequent visible emission observations, while fired on fuel gas, within 12 months after the preceding observation. If the EU has intermittent operations, subsequent visible emission observations may be completed during the next scheduled operation immediately following the preceding observation.	*Recordkeeping/ Method 9*	X		

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							Continuous	Intermittent	Not Triggered
3	16.2c(iii)	Heater and Boiler BACT (Opacity MR&R)	106-109, 518	Heaters and Boilers	While fired on fuel gas, record and report as required by Conditions 4 and 5 except report results compared to the 10 percent opacity BACT limit, in addition to the 20 percent opacity limit of Condition 1.	*Recordkeeping/ Operating Reports*	X		
3	16.2d	Heater and Boiler BACT (Opacity MR&R)	108, 109	Thermoflux UHM Heaters	Indicate in each Operating Report whether this unit fired only gas during the period covered by the report.	*Recordkeeping/ Operating Reports*	X		
					If operation on back-up liquid fuel occurred during the period covered by the report, monitor, record, and report according to Condition 13 to demonstrate compliance with the short-term heater BACT PM (opacity) limit in Table E that applies when this unit is fired on backup liquid fuel.	*Method 9/ Operating Reports* *Monitoring not required.*			X
3	16.3	Heater and Boiler BACT EE Reporting	106-109, 518, 839	Heaters and Boilers	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	17	Diesel Unit BACT	211	Cummins Backup Generator	Operate this unit using direct injection and timing retard. Implement good operational practices to minimize emissions.	*Recordkeeping / good operational practices.*	X		
3	17	Diesel Unit BACT Emission Limits	211	Cummins Backup Generator	Actual emissions from this engine shall be limited as indicated in Table F of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data, installation of BACT controls, low sulfur fuels, and good operational practices.*	X		
3	17.1	Diesel Unit BACT	211	Cummins Backup Generator	Maintain records that are available for inspection demonstrating that this unit is maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		
3	17.2a(i)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Conduct NOx and CO source tests in accordance with Section 6 of the permit at the highest typical operating load of this unit within 12 months after the effective date of the permit.	*Recordkeeping/ Source Test Reports*	X		
3	17.2a(ii), 17.2a(iii)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Conduct follow-up source tests in accordance with Section 6 of the permit at the highest typical operating load of this unit within 12 months of any subsequent exceedance of 400 hours operation in a consecutive 12-month period, except testing is not required if the latest test results were less than or equal to 90 percent of each of the applicable limits in Table F of the permit and it has been less than four years since the latest source test on this unit.	*Recordkeeping* *No follow-up source testing during the certification period for this emission unit.*			X

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							Continuous	Intermittent	Not Triggered
3	17.2a(iv)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	CPAI may substitute test data between engines operated by CPAI at stationary sources on the North Slope of Alaska if CPAI documents the intent to substitute testing for multiple engines and meets all other requirements of Conditions 40.1b(i) through 40.1b(iii) as they would apply to engine and the limits in Table F.	*Recordkeeping* *No substitution of source test data for this emission unit.*			X
3	17.2a(iv)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Provide with the source test report, the NOx and CO emissions in lbs/hr for each load tested.	*Recordkeeping/ Source Test Report* *No source testing conducted during the certification period.*			X
3	17.2b	Diesel Unit BACT (SO2 Limit MR&R)	211	Cummins Backup Generator	Monitor, record, and report in accordance with Conditions 14.2 or 14.3 and 14.5 to demonstrate compliance with the short-term BACT SO2 limit of 0.11% (by weight) sulfur in the liquid fuel.	*Recordkeeping/ Operating Reports*	X		
3	17.3	Diesel Unit BACT EE Reporting	211	Cummins Backup Generator	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	18	Flare BACT Limits	415, 416	Flares	Design, install and operate the flares to be smokeless to meet the requirements of 40 C.F.R. 60.18.	*Recordkeeping/ Equipment design*	X		
3	18.1 (effective 11/28/17)	Flare BACT Limits	415, 416	Flares	EU IDs 415 and 416 shall be designed for, and operated with, no visible emissions except for periods not to exceed a total of 5 minutes during any two consecutive hours and except for periods of startup, shutdown, or malfunction as defined in 40 C.F.R. 60.2.	*Recordkeeping* *(See also the Compliance Methods entered for Conditions 36.1 through 36.5, below, which were renumbered as Conditions 18.2 through 18.6 effective 11/28/17.)*	X		
3	19	Liquid Fuel Sulfur Content Limit	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	Do not use liquid fuel with a sulfur content that exceeds 0.11% by weight.	*Recordkeeping/ Operating Reports*	X		
3	19.1	Liquid Fuel Sulfur Content MR&R	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	To demonstrate compliance with the fuel oil sulfur content limit in Condition 19, monitor, record and report according to Condition 14.2 or 14.3 and 14.5.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	19.2	Liquid Fuel Sulfur Content EE Reporting	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	Submit an Excess Emissions report if the fuel oil sulfur content exceeds 0.11 percent by weight.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	20	Fuel Gas H2S Content Limit	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions.	*Recordkeeping/ Operating Reports*	X		
3	20.1	Fuel Gas H2S Content Limit (MR&R)	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	To demonstrate compliance with the fuel gas H2S content limit in Condition 20, monitor, record and report according to Conditions 14.6 through 14.8.	*Recordkeeping/ Operating Reports*	X		
3	20.2	Fuel Gas H2S Content Limit EE Reporting	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Submit an Excess Emissions report if the fuel gas H2S content exceeds 200 ppmv at standard conditions.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	21	Operating Limits	4, 108, 109, 211, 212, 313, 314, 417, 742, 743	Fuel-Fired Equipment	Operation of these emission units shall be limited to the restrictions of Table G of Air Quality Operating Permit No. AQ0489TVP02.	*Recordkeeping*	X		
3	21.1	Operating Limits	2, 3, 5	Turbines	Do not burn liquid fuel in these turbines.	*Recordkeeping*	X		
3	21.2	Operating Limits EE/PD Reporting	4, 108, 109, 211, 212, 313, 314, 417, 742, 743	Fuel-Fired Equipment	Submit an Excess Emissions or Permit Deviation report if the 12 consecutive month operating time and/or fuel consumption for any emission unit exceeds the operating limits described in Table G of the permit.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	22.1, 22.5, 24.1	Hours of Operation Monitoring	1-5, 106-110, 211, 212, 313, 314, 415, 416, 518-520, 621, 622, 839	Fuel-Fired Equipment	Monitor and record the monthly total operating time (all fuel types) for each emission unit, and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	22.2, 22.5	Hours of Operation Monitoring	4, 108, 109	Dual-Fired Equipment	Monitor and record the rolling 12-month total operating time on liquid fuel for each emission unit, and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	22.3, 22.5, 24.1	Hours of Operation Monitoring	211, 212, 313, 314, 621	Fuel-Fired Equipment & Incinerators	Monitor and record the rolling 12-month total hours of operation for each emission unit and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	22.4, 22.5	Hours of Operation Monitoring	211, 212, 621, 622	Fuel-Fired Engines	Monitor and record the calendar year total hours of operation for each emission unit and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	22.6	Operating Limits EE/PD Reporting	4, 108, 109, 211, 212, 313, 314, 743	Fuel-Fired Equipment	Submit an Excess Emissions or Permit Deviation report if any operating time limit in Table G of the permit (Condition 21) is exceeded.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	23	Fuel Consumption Monitoring	1-5, 106-110, 211, 212, 313, 314, 415-417, 518-520, 621, 622, 742, 743, 839	Fuel-Fired Equipment	Monitor and record fuel consumption and operations, as necessary to report the information required by Conditions 23.1 through 23.4, as applicable to each unit. Fuel use may be estimated by measurement techniques and calculations approved by the Department.	*Recordkeeping*	X		
3	23.1	Fuel Consumption Reporting	1-5, 106-110, 211, 212, 313, 314, 415-417, 518-520, 621, 622, 742, 743, 839	Fuel-Fired Equipment	Include in the Operating Report the monthly total fuel consumption for each type of fuel (MMscf/month and/or gallons/month) for each unit, for each month of the reporting period.	*Operating Reports*	X		
3	23.2	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac	Include in the Operating Report the maximum daily combined total fuel consumption (gallons) for EU IDs 742 and 743 at CD-1 and CD-2, combined, and all daily total fuel consumption values in excess of the daily limit found in Condition 21, if applicable, for each month of the reporting period.	*Operating Reports*	X		
3	23.3	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac	Include in the Operating Report the 12 consecutive month total fuel consumption (gallons) for each of EU IDs 742 and 743 at CD-1, CD-2, CD-3, and CD-4, combined, for each month of the reporting period.	*Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	23.4a	Operations and Fuel Consumption Monitoring and Recordkeeping	417	Portable Flares	Monitor and keep the following records of portable flare operations at CD-1, CD-2, CD-3 and CD-4: (i) The location, date and time of startup and completion for each portable flare and whether simultaneous portable flare operations occurred on a single pad, and (ii) The quantity of gas combusted during each flaring event, average temperature and pressure, corrected quantity of gas combusted each month (MMscf), and twelve consecutive month total gas burned in all portable flares (MMscf). The fuel use may be estimated by measurement techniques and calculations approved by the Department.	*Recordkeeping/ Operating Reports*	X		
3	23.4b	Operations and Fuel Consumption Reporting	417	Portable Flares	Report in the Operating Report the data recorded in Conditions 23.4a(i) through 23.4a(ii) to illustrate the compliance status with the operating limit tabulated in Condition 21 of the permit that applies to EU ID 417 for each month of the reporting period.	*Operating Reports*	X		
3	23.5	Operating Limits EE/PD Reporting	2-5, 108, 109, 211, 212, 313, 314, 417, 742, 743	Fuel-Fired Equipment	Submit an Excess Emissions or Permit Deviation report if any fuel consumption operating limit in Table G of the permit (Condition 21) is exceeded or if any of EU IDs 2, 3, or 5 operate on liquid fuel.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	23.6	Operating Limits PD Reporting	743	Well Frac Unit(s)	Submit a Permit Deviation report if this unit operates on any day between June 1 and October 31 inclusive at either CD-1 or CD-2.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	23.7	Operating Limits PD Reporting	743	Well Frac Unit(s)	Submit a Permit Deviation report if this unit operates with use of a combustion turbine driver.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	24	Limits to Avoid PSD	621	CD-3 Caterpillar 3412E Generator	Limit operations of this unit to no greater than 1,500 hours per consecutive 12-month period.	*Recordkeeping*	X		
3	24.2	Limits to Avoid PSD EE/PD Reporting	621	CD-3 Caterpillar 3412E Generator	Submit an Excess Emissions or Permit Deviation report if this unit operates for greater than 1,500 hours in any consecutive 12-month period.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	25	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	Limit VOC emissions at CD1, CD2, CD3, and CD4 from this emission unit during well maintenance activities to a combined total no greater than 31 tons per 12-month rolling period.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	25.1	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	During well maintenance activities and when sending live crude oil to this emission unit, record the following: - date and time that venting began and ended - event description (well name, type of activity, etc.) - description of fluids introduced to the tank(s) - volume of liquid accumulated in the tank(s) - estimated percentage of live crude oil in the total liquid volume accumulated in the tank(s) - estimated volume of gas vented - estimated tonnage of VOC's vented - operational comments and/or assumptions used for estimated volumes reported	*Recordkeeping* *No well maintenance flowbacks during the certification period.*			X
3	25.2	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	During well maintenance activities and when sending live crude to this emission unit, estimate the monthly tonnage of total VOC emissions from this emission unit at CD-1, CD-2, CD-3, and CD-4 using methods outlined in the permit or an alternate method approved by the department.	*Recordkeeping* *No well maintenance flowbacks during the certification period.*			X
3	25.3	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	Report using the Operating Report, the following information for any month when well maintenance has occurred and live crude oil has been sent to EU ID 946: - the monthly and rolling 12-month total estimated VOC emissions at CD-1, CD-2, CD-3, and CD-4 - the input and output from simulation models and software - all calculations and assumptions used.	*Recordkeeping/ Operating Reports* *No well maintenance flowbacks during the certification period.*			X
3	26, 26.1	VE Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Reasonable Inquiry*	X		
3	26, 26.2	PM Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Particulate Matter emitted must not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Reasonable Inquiry*	X		
3	26, 26.3	Sulfur Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Sulfur compound emissions, expressed as SO2, must not exceed 500 ppm averaged over 3 hours.	*Recordkeeping* *Fuel gas and diesel fuel sulfur monitoring.*	X		
3	26, 26.4a	General MR&R for IEUs	IEUs	Insignificant Emission Units	Annually certify compliance with Condition 26 based on reasonable inquiry.	*Recordkeeping* *Compliance Certification Report* *Reasonable Inquiry*	X		

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							Continuous	Intermittent	Not Triggered
3	26, 26.4c	Insignificant Emission Units with Actual Emissions > IEU Thresholds	211, 212, 621, 622	Insignificant Emission Units	If any of these emission units has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Recordkeeping* *Hours of operation monitoring* *Operating Report (if applicable)*			X
3	26, 26.4c	Insignificant Emission Units with Actual Emissions > IEU Thresholds	IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Reasonable inquiry*			X
3	26, 26.4d	General MR&R for IEUs	IEUs	Insignificant Emission Units	No other MR&R required.	*Advisory Condition*	X		
4	27.1	NSPS Subpart A - Notification Requirements	NA	New NSPS Affected Facility	Notify EPA and the Department of the date any construction or reconstruction of an NSPS-affected facility commences. Notification to be postmarked no later than 30 days after such date.	*Recordkeeping* *No reporting required.*			X
4	27.2	NSPS Subpart A - Notification Requirements	NA	New NSPS Affected Facility	Notify EPA and the Department of the actual date of initial startup of a new NSPS-affected facility within 15 days of startup.	*Recordkeeping* *No reporting required.*			X
4	27.3	NSPS Subpart A - Notification Requirements	NA	NSPS Existing Facility	Notify EPA and the Department 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. Notification to be postmarked 60 days or as soon as practicable before the change is commenced. Notification to include information listed in Condition 27.3a-d.	*Recordkeeping* *No reporting required.*			X
4	27.4	NSPS Subpart A - Notification Requirements	NA	NSPS Existing Facility	Notify EPA and the Department of any proposed replacement of an existing facility. Notification to be postmarked 60 days (or as soon as practicable) before construction is commenced and must include information required in Condition 27.4a-g.	*Recordkeeping* *No reporting required.*			X
4	28	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-5	NSPS Emission Units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units, any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative. (While this obligation applied to EU IDs 415, 416, and 945 through 11/17/2017 only, records established prior to this date for these emission units must be retained for a period of 5 years after this date.)	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	29	NSPS Subpart A - EEMSP Report	1-5	NSPS Emission Units	Except as provided for in Condition 41.3a(iii), submit to the EPA (copy to the Department) written "excess emissions and monitoring systems performance (EEMSP) reports and/or summary report forms as required by Condition 30 for EU IDs 1-5. Submit the EEMSP reports semiannually, postmarked by the 30th day following the end of each 6-month period. Report excess emissions for all periods of unit operation, including startup, shutdown, and malfunction.	*Recordkeeping*	X		
4	29.1	NSPS Subpart A - EEMSP Report	1-5	NSPS Emission Units	Except as provided for in Condition 30.1, submit the EEMSP reports with the summary report form as required in Condition 30. Written reports of excess emissions shall include the information described in Conditions 29.1a-29.1d.	*Recordkeeping*	X		
4	30	NSPS Subpart A - Summary Report Form	1-5	NSPS Emission Units	Except as provided for in Condition 41.3a(iii), submit to the EPA (copy to the Department) a "summary report form" in the format shown in Figure 1 of 40 C.F.R. 60.7 for each pollutant monitored for EU IDs 1-5. Submit only the summary report form instead of the EEMSP report under Condition 29 if the total duration of excess emissions for the reporting period is less than 1 percent and the CMS downtime is less than 5 percent of the total operating time for the reporting period. Otherwise submit the summary report form along with the EEMSP report described in Condition 29.	*Recordkeeping*	X		
4	31	NSPS Subpart A - Performance Tests	NSPS-Affected Units	NSPS Emission Units	Conduct source tests according to the applicable requirements of 40 C.F.R. 60.8 and Section 6 of the permit on any affected facility within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup, and at such times as may be required by EPA, and shall provide the Department and EPA with a written report of the results of the source test.	*Source Test Reports* *Condition not triggered.*			X
4	32	NSPS/NESHAP Subpart A - Good Air Pollution Control Practice	1-5, 108-110, 313, 314, 519, 520, 944	NSPS/NESHAP emission units	At all times, these emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.	*Recordkeeping*	X		

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4	33	NSPS Subpart A - Credible Evidence	1-5, 108-110, 519, 520	NSPS emission units	Nothing in the permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.	*Advisory Condition*	X		
4	34	NSPS/NESHAP Subpart A - Concealment of Emissions	1-5, 108-110, 313, 314, 519, 520, 622	NSPS/NESHAP emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions ~~35,~~ 37, ~~39 through~~ 40, 41, 42, or 44. (This obligation no longer pertains to Conditions 35 and 39 as of 11/27/2017.)	*Recordkeeping*	X		
4	35	~~NSPS Subpart A - General Control Device Requirements~~	~~415~~	~~HP Flare~~	~~Design, operate, and monitor these flares used as a control device for EU ID 945, to ensure that it they are operated and maintained in conformance with 40 C.F.R. 60.18(c) and 60.18(d) through (f) as applicable and as outlined in Conditions 35.1-35.8.~~ **This condition is no longer in effect as of 11/27/2017.**	***Condition no longer in effect.***			X
			~~416~~	~~LP Flare~~					X
4	36.1 (18.2 effective 11/28/17)	Visible Emissions Monitoring for Flares	415	HP Flare	At least once in every calendar month that each unit operates, momentarily observe their exhaust during normal operation for indications of visible emissions. Keep a log of the observations in accordance with Condition 36.3.	*Recordkeeping* ***Condition 36.1 became Condition 18.2 effective 11/28/2017.***	X		
			416	LP Flare		*Recordkeeping* ***Condition 36.1 became Condition 18.2 effective 11/28/2017.***	X		
4	36.2 (18.3 effective 11/28/17)	Visible Emissions Monitoring for Flares	415	HP Flare	If visible emissions are observed at any time during normal flaring operation of each unit and are present continuously for more than two (2) minutes, the Permittee shall conduct a visible emission (VE) evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 22. The Method 22 VE observation period shall not be less than 2-hours in duration, sufficient to document a violation of Condition 35.1. Observation of the flare may be postponed for safety or due to weather reasons.	*Recordkeeping* ***Condition 36.2 became Condition 18.3 effective 11/28/2017.***			X
			416	LP Flare		*Recordkeeping* ***Condition 36.2 became Condition 18.3 effective 11/28/2017.***			X

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4	36.2a-36.2d (18.3a-18.3d effective 11/28/17)	Visible Emissions Monitoring and Recordkeeping for Flares	415	HP Flare	If visible emissions are noted for a total of more than 5 minutes during the Method 22 VE observation under Condition 36.2, perform the actions described in Conditions 32.6a-36.2d.	*Recordkeeping* **Condition 36.2 became Condition 18.3 effective 11/28/2017.**			X
			416	LP Flare		*Recordkeeping* **Condition 36.2 became Condition 18.3 effective 11/28/2017.**			X
4	36.3 (18.4 effective 11/28/17)	Visible Emissions Recordkeeping for Flares	415	HP Flare	For observations of visible emissions per Condition 36.1 and for any Method 22 observations per Condition 36.2, record the the information required by Conditions 36.3a-36.3f in a written log for each observation for each flare.	*Recordkeeping* **Condition 36.3 became Condition 18.4 effective 11/28/2017.**	X		
			416	LP Flare		*Recordkeeping* **Condition 36.3 became Condition 18.4 effective 11/28/2017.**	X		
4	36.4a (18.5a effective 11/28/17)	Visible Emissions PD Reporting for Flares	415, 416	HP Flare LP Flare	Submit a Permit Deviation report for failure to conduct monitoring or recordkeeping per Conditions 36.1 through 36.3.	*Recordkeeping/ Permit Deviation Reports* **Condition 36.4 became Condition 18.5 effective 11/28/2017.**			X
4	36.4b (18.5b effective 11/28/17)	Visible Emissions EE Reporting for Flares	415, 416	HP Flare LP Flare	Submit an Excess Emissions report when the flare exhaust is visible for more than a total of five (5) minutes during any two (2) consecutive hours, except if the emissions are observed during startup, shutdown or malfunction.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.* **Condition 36.4 became Condition 18.5 effective 11/28/2017.**			X
4	36.4c (18.5c effective 11/28/17)	Visible Emissions EE/PD Reporting for Flares	415, 416	HP Flare LP Flare	Include in the Excess Emissions or Permit Deviation report required by Conditions 36.4a or 36.4b copies of the records required by Conditions 36.3a through 36.3f.	*Recordkeeping/ EE/PD Reports* **Condition 36.4 became Condition 18.5 effective 11/28/2017.**			X
4	36.5 (18.6 effective 11/28/17)	Visible Emissions Reporting for Flares	415, 416	HP Flare LP Flare	Submit with the Operating Report for the period covered by the report: a. Copies of records required under Conditions 36.2c and 36.3; and b. The dates that informal VE observations per Condition 36.1 were made, and the dates, if any, that a Method 22 VE per Condition 36.2 was observed.	*Operating Reports* **Condition 36.5 became Condition 18.6 effective 11/28/2017.**	X		
4	37	NSPS Subpart Dc - Requirements	108, 109	Thermoflux UHM Heaters	Do not combust liquid fuel with a sulfur content greater than 0.5% by weight.	*Recordkeeping/ Operating Reports*	X		
4	37.1a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Record and maintain records of the amounts of each fuel (fuel gas and fuel oil, where applicable) combusted in each unit during each operating day or monitor according to an EPA-approved custom fuel monitoring schedule.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	37.1a, 37.1b	NSPS Subpart Dc - Requirements	110, 519, 520	Gas-fired NSPS Subpart Dc Affected Heaters	Record and maintain records of the amount of fuel gas combusted in each unit during each operating day or during each calendar month or monitor according to an EPA-approved custom fuel monitoring schedule.	*Recordkeeping*	X		
4	37.1c	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Obtain from the fuel supplier the results of a fuel oil sulfur analysis in accordance with Condition 14.2 or Condition 14.3a(i) or analyze the sulfur content of the fuel using ASTM D7039-07.	*Recordkeeping*	X		
4	37.2a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Keep records of monitoring required by Conditions 37.1a, 37.1b, and 37.1c.	*Recordkeeping*	X		
4	37.2b	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Keep records documenting a constant supplier or source of fuel oil.	*Recordkeeping*	X		
4	37.2c	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Notify EPA Region 10 of any change in supplier or source of fuel oil. A substantial change in fuel oil quality shall be considered as a change in fuel oil supply.	*Recordkeeping*			X
4	37.3a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Semi-annually report to EPA (by the 30th day following the end of the reporting period) the results of all sulfur monitoring, including: (i) calendar dates covered by the report; (ii) for each calendar month during which fuel oil was combusted by either of these emission units: a) monthly average fuel oil sulfur content (weight %), b) reasons for any noncompliance with the fuel oil sulfur standard in Condition 37, and c) any corrective actions taken. (iii) If no fuel oil was combusted during reporting period, the report shall state that no fuel oil was combusted during the period and fuel oil sulfur monitoring was not required.	*Recordkeeping*	X		
4	37.3b	NSPS Subpart Dc - EE Reporting	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Submit an Excess Emissions report if the fuel oil sulfur content exceeds 0.5% sulfur by weight.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	38	NSPS Subpart Ka - Requirements	944	ULSD Tank	Do not store in EU ID 944 a petroleum liquid with a true vapor pressure greater than 1.0 psia without first taking measures to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	38.1	NSPS Subpart Ka - Requirements	944	ULSD Tank	Annually certify that EU ID 944 stores only Arctic heating fuel, diesel fuel, Jet A fuel, or another liquid with a true vapor pressure of 1.0 psia or less or that measures have been taken to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable.	*Recordkeeping* *Annual Compliance Certification Report*	X		
4	~~39~~	~~NSPS Subpart Kb - VOC Standard~~	~~945~~	~~Methanol Tank~~	Equip this emission unit with a closed vent system and control device. The closed vent system must be designed to collect all VOC vapors and gases discharged from the storage vessel and operated with no detectable emissions as indicated by an instrument reading of less than 500 ppm above background as determined by Method 21. The control device shall be designed and operated to reduce inlet VOC emissions by 95% or greater. **This condition is no longer in effect as of 11/27/2017.**	***Conditions no longer in effect.***			X
4	~~39.1~~	~~NSPS Subpart Kb - VOC Standard~~	~~415, 416~~	~~Flares~~	Operate and maintain the flares in accordance with Condition 35. **This condition is no longer in effect as of 11/27/2017.**				X
4	~~39.2~~	~~NSPS Subpart Kb - VOC Standard~~	~~415, 416~~	~~Flares~~	Maintain records of all periods when each flare pilot flame was absent. **This condition is no longer in effect as of 11/27/2017.**				X
4	~~39.3~~	~~NSPS Subpart Kb - VOC Standard~~	~~415, 416~~	~~Flares~~	Submit records of all periods of operation when the pilot flames were absent for each unit to EPA semi-annually. **This condition is no longer in effect as of 11/27/2017.**				X
4	~~39.4~~	~~NSPS Subpart Kb - VOC Standard~~	~~945~~	~~Methanol Tank~~	Keep readily accessible records for the life of the tank showing the dimensions and an analysis showing the capacity of the storage vessel. **This condition is no longer in effect as of 11/27/2017. However, records are to be maintained as long as the tank is not scrapped.**	*Recordkeeping*	X		

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4	40	NSPS Subpart GG - NO_X Standard	1	Injection Turbine (C1)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 172 ppmvd.	*Compliance determined by source test results.*	X		
			2	Generator Turbine (E1)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 168 ppmvd.	*Compliance determined by source test results.*	X		
			3	Generator Turbine (E2)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 190 ppmvd.	*Compliance determined by source test results.*	X		
			4, 5	Solar Turbines (S1 & S2)	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 180 ppmvd. Note: EU ID 4 is exempt from this standard when firing on liquid fuel in accordance with 40 CFR 60.332(k).	*Compliance determined by source test results.*	X		
4	40.1a	NOx MR&R PERIODIC TESTING	1-5	Turbines	When any of these emission units operate 400 hours or more in any consecutive 12-month period during the life of the permit, then Condition 40.1a(i) or 40.1a(ii) must be satisfied for that unit.	*Source tests/ recordkeeping*	X		
4	40.1a(i)	NOx MR&R PERIODIC TESTING	1-5	Turbines	For an existing turbine whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the most stringent applicable limit shown in Conditions 15 and 40, conduct subsequent source tests using approved reference methods by the schedule below: (A) Within 1 year of the effective date of the permit if the most recent source test or substitute source test for the affected unit occurred greater than four years prior to the effective date of the permit and the turbine operated 400 hours or more in any 12-month period ending during any of the 6 months that precede the permit effective date, or (B) Within 1 year after a trigger event (operating 400 hours or more in any 12-month period) if the last source test occurred greater than four years prior to the trigger event.	*Source tests/ recordkeeping*	X		
4	40.2a(ii)	NOx MR&R PERIODIC TESTING	1-5	Turbines	For an existing turbine whose latest emissions source testing was certified as operating at greater than 90 percent of any of the applicable limits shown in Conditions 15 and/or 40, conduct subsequent source tests using approved reference methods, annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the most stringent of applicable limits of Conditions 15 and 40.	*Source test data* *All test results 90 percent or less of the applicable limits.*			X
4	40.1b	NOx MR&R SUBSTITUTING TEST DATA	1-5	Turbines	CPAI may use a source test on only one of the turbines to satisfy the testing requirement if the test is representative of the group and the results are less than 90% of the limit, as described in Condition 40.1b.	*Source test data - substituion of test data has not been done at Alpine.*			X

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4	40.1c(i)	NOx MR&R LOAD	1-5	Turbines	Tests shall be conducted in accordance with 40 CFR 60.335(b)(2) or other approved method. Testing shall occur when turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Source test data* *No source tests conducted during the certification period.*			X
4	40.1c(ii)	NOx MR&R LOAD	1-5	Turbines	Demonstrate in the source test plan whether the test is scheduled when maximum NOx emissions are expected.	*Source test data* *No source tests conducted during the certification period.*			X
4	40.1c(iii)	NOx MR&R LOAD	1-5	Turbines	If the highest operating rate tested is less than the maximum load of the tested turbine or another turbine represented by the test data, comply with Conditions 40.1c(iii)(A) - (D).	*Source test data* *No source tests conducted during the certification period.*			X
4	40.1c(iv) 40.1c(v)	NOx MR&R LOAD	1-5	Turbines	In order to perform an emission test, CPAI may operate a turbine at a higher load than that prescribed by Condition 40.1c(iii). For the purposes of Conditions 40.1 through 40.3, maximum load means the hourly average load that is the smallest of the loads defined in Conditions 40.1c(v)(A) - (C).	*Advisory Conditions*	X		
4	40.2a	NOx MR&R RECORD KEEPING	1-5	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load and method for calculating load from the measurements. Within one month of demonstrating highest load under Condition 40.1c(iii)(A), submit to the Department how load or load surrogates will be measured and a schedule for necessary equipment installation and monitoring.	*Source test data*			X
4	40.2b	NOx MR&R RECORD KEEPING	1-5	Turbines	For turbines that operate less than 400 hours in any 12 consecutive months, keep monthly records of the hours of operation.	*Recordkeeping/ Operating Reports*			X
4	40.3a	NOx MR&R REPORTING	1-5	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine identification, highest load recorded during the period covered by the Operating Report.	*Recordkeeping* *Reporting not required during certification period.*			X
4	40.3b	NOx MR&R REPORTING	1-5	Turbines	For turbines that have not been tested because they normally operate less than 400 hours in any 12 consecutive months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 consecutive months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
4	40.3c	NOx MR&R EE/PD REPORTING	1-5	Turbines	Submit an excess emission or permit devation report if: a test result exceeds the emission standard, source testing is required by Condition 40.1a but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedence of emission limits in Conditions 15 or 40.	*Recordkeeping/source test data* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X

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4	41	NSPS Subpart GG - SO2 Standard	1-5	Turbines	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 0.8 percent by weight.	*Recordkeeping* *Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		
			4	Solar Turbine (S1)	Do not allow the sulfur content of the liquid fuel burned in this emission unit to exceed 0.8 percent by weight.	*Recordkeeping*	X		
4	41.1a	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Demonstrate compliance with Condition 41 (NSPS SO2 Standard) by either: - demonstrating that the gaseous fuels fired in these emission units meet the definition of natural gas found in 40 CFR 60.331(u), or - monitoring the total sulfur content of the gaseous fuels burned in these emission units using the total sulfur methods described in Condition 41.1e(ii). Alternatively, if the total sulfur content of the gaseous fuels during the most recent performance test was less than 4000 ppmw, methods ASTM D4084-82, 94, D5504-01, D6228-98, or GPA Standard 2377-86 may be used to measure the major sulfur compounds, or - monitoring according to the custom fuel monitoring schedule and plan as allowed under Condtion 41.1c.	*Recordkeeping/ Operating Reports* *Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		
			4	Dual fuel-fired Solar Taurus (S1)	Demonstrate compliance with Condition 41 (NSPS SO2 Standard) by either: - monitoring the total sulfur content of the liquid fuel burned in this unit using the total sulfur methods described in Condition 41.1e(i), or - monitoring according to the custom fuel monitoring schedule and plan as allowed under Condtion 41.1c.	*Recordkeeping/ Operating Reports* *Method - ASTM 7039-07, which is appropriate for ULSD fuel sulfur monitoring.*	X		
4	41.1b	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Use an approved method when making the optional demonstration that the fuel gas fired by these emission units meets the definition of natural gas.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		

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4	41.1c	NSPS Subpart GG SO2 Monitoring	1-3	Turbines	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. The EPA-approved Custom Fuel Monitoring Schedule and Alternate H2S Sampling Method established for EU IDs 1 through 3 allow the Permittee to determine the sulfur content of the fuel at least semi-annually using ASTM-D 4810-88, D 4913-89, or Gas Producers Association 2377-86.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	41.1d(i)(A), 41.1d(i)(B)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	(A) 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 Part 75 of the C.F.R (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). If an emission allowance is being claimed for fuel-bound nitrogen, the nitrogen content of the oil shall be determined and recorded once per unit operating day; or (B) Monitor in accordance with a Custom Fuel Monitoring Schedule and/or Plan approved by the Administrator.	*CPAI monitors the sulfur content of the liquid fuel according to a Custom Fuel Monitoring Schedule as allowed under Condition 41.1d(i)(B). The applicable liquid fuel sulfur monitoring for EU ID 4 is provided in Condition 41.1d(i)(C).*	X		
4	41.1d(i)(C)(1)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	Determine the amount of fuel oil combusted daily by this unit.	*Recordkeeping/ Operating Reports*	X		
4	41.1d(i)(C)(2)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	For each calendar month during which this unit is fired on liquid fuel, obtain from the fuel supplier the results of a fuel oil sulfur analysis conducted in accordance with the test methods referenced in 40 C.F.R. 60.335(b)(10)(i) [see Condition 41.1e(i)] or ASTM D7039-07.	*Recordkeeping/ Operating Reports*	X		

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4	41.1d(i)(C)(3)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Recordkeeping	4	Dual fuel-fired Solar Taurus (S1)	Maintain a record documenting a constant supplier or source of fuel.	*Recordkeeping*	X		
4	41.1d(i)(C)(4)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Reporting	4	Dual fuel-fired Solar Taurus (S1)	Notify EPA Region 10 of any change in supplier or source of fuel. A substantial change in fuel quality shall be considered as a change in fuel supply.	*Recordkeeping/ EPA Notifications*			X
4	41.1d(ii)(A)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	If CPAI elects not to demonstrate sulfur content using options in Condition 41.1b or 41.1c, and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined under Condition 41.1a and recorded once per unit operating day.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	41.1d(ii)(B)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Notwithstanding the requirements of Condition 41.1d(ii)(A), the Permittee may develop a custom schedule 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, according to the provisions and as allowed under 40 C.F.R. 60.334(i)(3). The two custom sulfur monitoring schedules set forth in 40 C.F.R 60.334(i)(3)(i)(A) through (D) and 60.334(i)(3)(ii) are acceptable without prior EPA approval.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	41.1e(i)	NSPS Subpart GG SO2 Monitoring	4	Dual fuel-fired Solar Taurus (S1)	Analyze a minimum of three fuel samples during each performance test. Analyze the samples for the total sulfur content of the liquid fuel using ASTM D129-00; D2622-98; D4294-02; D1266-98; D5433-00; or D1552-01.	*Recordkeeping* *Liquid fuel sulfur monitoring is conducted in accordance with Condition 41.1d(i)(C) using ASTM D7039-07, which is appropriate for ULSD fuel.*	X		
4	41.1e(ii)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Analyze fuel gas using ASTM D1072-80, 90 (reapproved 1994); D3246-81, 92, 96; D4468-85 (reapproved 2000); or D6667-01. 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 EPA.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X

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4	41.1f	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	The fuel sulfur analysis 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.	*Recordkeeping*	X		
4	41.2, 41.3b	NSPS Subpart GG SO2 Recordkeeping and Reporting	1-5	Turbines	Keep records of fuel gas and liquid fuel sulfur analyses as required by Condition 41.1. Keep records for at least five years after the date of collection. Include a copy of the records of the liquid fuel sulfur analyses, as required by Condition 41.2, with the Operating Report for the period covered by the report.	*Recordkeeping/ Operating Reports*	X		
4	41.3a	NSPS Subpart GG SO2 Reporting	1-5	Turbines	For each affected unit for which CPAI periodically determines the fuel sulfur content under Condition 41.1a, 41.1c, or 41.1d: (i) semi-annually report the results of all sulfur monitoring to EPA and send a copy to the Department by the 30th day following the end of each 6-month period, except as otherwise approved by a custom fuel monitoring schedule; (ii) include with the report submitted under Condition 41.3a(i) a report of excess emissions and monitoring system downtime in accordance with 40 C.F.R. 60.7(c) as summarized in Condition 29 and as defined under 40 C.F.R. 60.334(j)(2). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. (iii) If periodic fuel gas sulfur monitoring is not required because the demonstration under Condition 41.1b has been made, reporting under Conditions 29, 30, and this condition is not required.	*Subpart GG EEMSP Reports*	X		
4	41.3c	NSPS Subpart GG EE/PD Reporting	1-5	Turbines	Submit an Excess Emissions or Permit Deviation report if the fuel gas or fuel oil sulfur content exceeds 0.8% sulfur by weight, or if monitoring is required under Condition 41.1 but is not conducted, or any reporting required under Condition 41.3 is not completed.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
4	42, 42.1	NSPS Subpart IIII Requirements	622	CD-3 Caterpillar C27 Generator	Purchase an engine certified by the engine manufacturer to meet the new nonroad exhaust emission standards in Table 7 of 40 C.F.R. 1039.102 (EPA Tier 4-interim). The engine must be installed and configured according to the manufacturer's emission-related specifications or demonstrate compliance as outlined in 40 C.F.R. 60.4211(g)	*Recordkeeping*	X		
4	42, 42.2	NSPS Subpart IIII Requirements	622	CD-3 Caterpillar C27 Generator	Operate and maintain the stationary CI ICE and control device (if applicable) according to the manufacturer's emission-related written instructions over the entire life of the engine. In addition, CPAI may change only those settings that are permitted by the manufacturer.	*Recordkeeping*	X		

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4	42, 42.3	NSPS Subpart IIII Requirements	622	CD-3 Caterpillar C27 Generator	Burn only ULSD fuel (i.e., diesel fuel that has the following specifications: maximum sulfur content of 15 ppmw, minimum cetane number of 40, and a maximum aromatic content of 35 percent by volume).	*Recordkeeping*	X		
4	42, 42.4	NSPS Subpart IIII Recordkeeping	622	CD-3 Caterpillar C27 Generator	Maintain records of the manufacturer's certification that the engine meets the emission standards referenced in Condition 42.1.	*Recordkeeping*	X		
4	42, 42.5	NSPS Subpart IIII EE/PD Reporting	622	CD-3 Caterpillar C27 Generator	Submit an Excess Emissions or Permit Deviation report if any of the requirements in Condition 42 are not met.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
4	43	NESHAP Subpart A Prohibited Activities	313, 314	Incinerators	Do not operate the incinerators in violation of Condition 44, except under an exemption granted by the President.	*Recordkeeping*	X		
4	44	NESHAP Subpart E	313, 314	Incinerators	Mercury emissions from sludge incineration plants (incinerators) combined shall not exceed 3.2 kg per 24-hr period. Annually certify compliance with this limit.	*Recordkeeping/ Annual Compliance Certification Report*	X		
4	45, 45.1	NESHAP Subpart A General Provisions	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A in Table 2 to Subpart HH.	*Recordkeeping*	X		
4	45, 45.2	NESHAP Subpart A General Provisions	211, 212, 621	Liquid Fuel-Fired Engines	Comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A in Table 8 to Subpart ZZZZ.	*Recordkeeping*	X		
4	45, 45.3	NESHAP Subpart A General Provisions	947	Gasoline Dispensing Facility (4 Storage Tanks)	Comply with the applicable requirements of 40 C.F.R. 63 Subpart A in accordance with the provisions for applicability of Subpart A described in Table 3 to Subpart CCCCCC.	*Recordkeeping*	X		
4	46, 46.1	NESHAP Subpart HH Requirements	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Meet the requirements of 40 C.F.R. 63 Subpart HH by complying with the applicable requirements of Condition 53. Keep records and report as specified in Subpart HH.	*Recordkeeping*	X		
4	47	NESHAP Subpart ZZZZ Requirements	622	CD-3 Caterpillar C27 Generator	Comply with 40 C.F.R. 63 Subpart ZZZZ by meeting the applicable requirements of 40 C.F.R. 60 Subpart IIII as outlined in Condition 42.	*Compliance with NSPS Subpart IIII*	X		

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4	48.1	NESHAP Subpart ZZZZ Operation and Maintenance	211, 212, 621	Diesel-Fired Engines	At all times operate and maintain these units, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Comply with either: a. the manufacturer's emission-related written operation and maintenance instructions; or 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.	*Recordkeeping* *CPAI complies with Condition 48.1a.*	X		
4	48.2	NESHAP Subpart ZZZZ Startup and Idle Time	211, 212, 621	Diesel-Fired Engines	Minimize the engine's time spent at idle during startup and minimize the startup time to a period needed for appropriate and safe loading, not to exceed 30 minutes.	*Recordkeeping*	X		
4	48.3a	NESHAP Subpart ZZZZ Emissions Management Practices	211, 621	Diesel-Fired Engines	(i) Change oil and filter every 1,000 hours of operation or annually, whichever comes first. [ConocoPhillips has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) to extend the specified oil change requirement.] (ii) Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary. (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	*Recordkeeping*	X		
4	48.3b	NESHAP Subpart ZZZZ Emissions Management Practices	212	Detroit Black Start Generator (S4)	(i) Change oil and filter every 500 hours of operation or annually, whichever comes first. [ConocoPhillips has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) to extend the specified oil change requirement.] (ii) Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary. (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	*Recordkeeping*	X		
4	48.4a	NESHAP Subpart ZZZZ Recordkeeping	211, 212, 621	Diesel-Fired Engines	Keep records of maintenance to demonstrate that the engines and after-treatment control device (if any) are operated and maintained according to the Permittee's own maintenance plan, if maintenance is performed as allowed under Condition 48.1b. These records must include, at a minimum: oil and filter change dates and corresponding hour on the hour meter; inspection and replacement dates for air cleaners, hoses, and belts; and records of other emission-related repairs and maintenance performed.	*Recordkeeping* *The compliance method under Condition 48.1a is used (not Condition 48.1b)*			X

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4	48.4b	NESHAP Subpart ZZZZ Recordkeeping	211, 212, 621	Diesel-Fired Engines	Keep records in a form suitable and readily available for expeditious inspection and review, readily accessible in hard copy or electronic form, for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record pertaining to 40 C.F.R. Part 63 applicable requirements. All records may be retained off site.	*Recordkeeping*	X		
4	48.5a	NESHAP Subpart ZZZZ Reporting	211, 212, 621	Diesel-Fired Engines	Include in the Operating Report a report of Subpart ZZZZ deviations as defined in 40 C.F.R. 63.6675 and of each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A (Table 8 of Subpart ZZZZ) was not met.	*Operating Reports* *No Subpart ZZZZ deviation reporting required during the certification period.*			X
4	48.5b	NESHAP Subpart ZZZZ PD Reporting	211, 212, 621	Diesel-Fired Engines	Submit a Permit Deviation report if any deviation from the requirements in Conditions 48.1 through 48.4 occurred.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
4	49, 49.1	NESHAP Subpart CCCCCC General O&M Requirements	947	Gasoline Dispensing Facility	At all times, operate and maintain EU ID 947, 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 EU ID 947.	*Recordkeeping*	X		
4	49.2	NESHAP Subpart CCCCCC Emissions Management Practices	947	Gasoline Dispensing Facility	Do not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: a. Minimize gasoline spills; b. Clean up spills as expeditiously as practicable; c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.	*Reasonable inquiry*	X		

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							Continuous	Intermittent	Not Triggered
4	49.3	NESHAP Subpart CCCCCC Recordkeeping	947	Gasoline Dispensing Facility	a. Keep records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or of the air pollution control and monitoring equipment. b.Keep records of actions taken during periods of malfunction to minimize emissions according to Condition 49.1 including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. c. Keep records documenting the monthly total gasoline throughput of all tanks that make up EU ID 947 beginning January 10, 2008. Provide these records within 24 hours of a request from the Administrator for such records. d. Keep records in a form suitable and readily available for expeditious inspection and review, readily accessible in hard copy or electronic form, for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record pertaining to 40 C.F.R. Part 63 applicable requirements. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site.	*Recordkeeping*	X		
4	49.4a, 49.4b	NESHAP Subpart CCCCCC Reporting	947	Gasoline Dispensing Facility	a. Except as provided under Condition 49.4b, submit a report to the Administrator by March 15 of each year. Include the following information in the report: (i) the number, duration, and a brief description of each type of malfunction of EU ID 947 which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded; (ii) a description of actions taken during a malfunction of EU ID 947 to minimize emissions according to Condition 49.1 including actions taken to correct a malfunction. b. No report is necessary for a calendar year in which no malfunctions occurred.	*NESHAP Subpart CCCCCC Reports* *A report was not required to be submitted during the certification period.*			X
4	49.4c	NESHAP Subpart CCCCCC PD Reporting	947	Gasoline Dispensing Facility	Submit a Permit Deviation report if any deviation from the requirements in Conditions 49 through 49.3 occurred.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X

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4	50, 50.1	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Do not burn more than 10% sewage sludge on a dry basis in each incinerator. Maintain records of the estimated dry percent sewage sludge charging rate for each batch incinerated.	*Recordkeeping*	X		
4	50.2, 50.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Estimate the relative weight of dry sewage sludge and the weight of all fuels and wastes combusted in each incinerator. Maintain records of the estimated weight of dry sewage sludge and the weight of all fuels and wastes incinerated in this unit.	*Recordkeeping*	X		
4	50.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Quarterly calculate the percentage of dry sewage sludge incinerated in each unit. Report in the Operating Report the calculated percentage of dry sewage sludge combusted for the period covered by the report.	*Operating Reports*	X		
4	50.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Upon request, submit the estimated relative weight of dry sewage sludge and all fuels and wastes incinerated in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested the estimated relative weight of dry sewage sludge and all fuel /waste during the certification period.*			X
4	50.6	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if either incinerator burns more than 10% sewage sludge on a dry basis.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	51	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Do not combust a fuel feed stream which is greater than 10% (in aggregate) of hospital waste and medical/infectious waste in this incinerator, as measured on a calendar quarter basis.	*Recordkeeping*	X		

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4	51.1, 51.2	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Estimate the relative weight of the hospital/medical/infectious waste combusted in each incinerator. Keep these records on a calendar quarter basis.	*Recordkeeping*	X		
4	51.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Quarterly calculate the percentage of hospital/medical/infectious waste incinerated in each unit. Report in the Operating Report the calculated percentage of hospital/medical/infectious waste combusted for the period covered by the report.	*Operating Reports*	X		
4	51.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Upon request, submit the estimated relative weight of the hospital/medical/infectious waste combusted in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested estimated relative weight of the HMI waste information during the certification period.*			X
4	51.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if the estimated weight of the hospital/medical/infectious waste combusted in each incinerator is more than 10% in any calendar quarter.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	52	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Burn greater than 30% municipal solid waste or refuse-derived fuel as a percentage of all fuels and wastes burned in each incinerator.	*Recordkeeping*	X		
4	52.1, 52.2	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Estimate the relative weight of municipal solid waste or refuse-derived fuel, and the weight of all other fuels and wastes combusted in each incinerator. Keep these records on a calendar quarter basis.	*Recordkeeping*	X		

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4	52.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Quarterly calculate the percentage of municipal solid waste or refuse-derived fuel incinerated in each unit. Report in the Operating Report the calculated percentage of municipal solid waste or refuse-derived fuel combusted for the period covered by the report.	*Operating Reports*	X		
4	52.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Upon request, submit the estimated relative weight of the municipal solid waste or refuse-derived fuel combusted in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested estimated relative weight of the municipal solid waste or refuse-derived fuel information during the certification period.*			X
4	52.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if the estimated weight of the municipal solid waste or refuse-derived fuel combusted in each incinerator is less than or equal to 30%.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	53, 53.1	Glycol Dehydration Unit	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Connect the process vent from the glycol dehydration unit to a process natural gas line. Maintain records demonstrating that the process vent tie-in from the glycol dehydration unit is constructed to vent only into a process natural gas line available to the Department for review.	*Recordkeeping*	X		
4	53.2	Glycol Dehydration Unit	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Submit a notification in advance of each glycol dehydration unit process vent configuration change.	*Recordkeeping* *No notification required*			X
4	54	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X
4	54	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
4	54	Asbestos NESHAP	All	NA	Keep records in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
4	54	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61 Subpart A and Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X

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4	55, 55.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.154: No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
4	55, 55.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.156: All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping* *Contractor certification and training.*	X		
4	55, 55.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.161: Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
4	55, 55.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.162: All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		
4	55, 55.1	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and recordkeeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
4	56	NESHAP Applicability	All	NA	Determine applicability under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement. If a source becomes affected by an applicable subpart of 40 C.F.R. 63, shall notify the Department and the Administrator as required by the applicable subpart and in accordance with 40 C.F.R. 63.9(b)(1) and comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 C.F.R. 63.6(c).	*Recordkeeping* *Notification not required during the certification period.*	X		
5	60, 61, 62	Adminstration Fees and Assessable Emissions	N/A	Entire Stationary Source	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to the Department by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		
5	63.1	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		

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5	63.2	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions.	*Recordkeeping*	X		
5	63.3	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
5	64	Dilution	NA	NA	Do not dilute emissions to comply with permit.	*Reasonable Inquiry*	X		
5	65	Fugitive Emissions	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable inquiry*	X		
5	65.1a	Fugitive Emissions	All	NA	Keep records of all complaints received.	*Records of complaints* *No complaints received during the certification period or for the past 5 years. No ADEC inspections have identified potential fugitive dust problems.*			X
5	65.1b	Fugitive Emissions	All	NA	Keep records of any additional precautions taken to: 1 - address complaints; or 2 - address the results of Department inspections which found potential problems; and 3 - prevent future dust problems Report according to Condition 67.	*Records of Complaints/* *Reporting in accordance with Condition 67*			X
5	66	Stack Injection	All	NA	Do 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 unless approved in writing by the Department.	*Reasonable Inquiry*	X		
5	26.4b, 65.1c, 67	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Recordkeeping*	X		
5	26.4b, 65.1c, 67.1	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known emissions that present a threat to human health or safety.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	26.4b, 65.1c, 67.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 67.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known compliants during the certification period.*			X
5	26.4b, 65.1c, 67.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if the Department notifies CPAI that it has found a violation of Condition 67.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known compliants during the certification period.*			X
5	26.4b, 65.1c, 67.4	Air Pollution Prohibited Recordkeeping	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping* *No known complaints during the certification period.*	X		
5	26.4b, 65.1c, 67.5	Air Pollution Prohibited Reporting	All	All emission units, including insignificant emission units	Include a brief summary report with each Operating Report which contains: -the number of complaints received -number of times CPAI or the Department found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or the Department found necessary that were not taken within 24 hours	*Operating Reports* *No known complaints during the certification period. Documentation of no complaints was stated in Operating Reports.*	X		
5	26.4b, 65.1c, 67.6	Air Pollution Prohibited Reporting	All	All emission units, including insignificant emission units	Notify the Department of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *Verified that condition was not triggered during certification period. CPAI did not receive any complaints attributable to stationary source emissions.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	68	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard listed in Conditions 15 through 18, 35, 37, 39, 40, 41 or 42.	*Recordkeeping* *No emissions in excess of a technology-based emission standard occurred during the certification period.*			X
					Give the Department written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered, as required by Condition 84.	*Recordkeeping* *Emissions in excess of a technology-based emission standard that occurred in 2017 were discovered in 2018 and reported to ADEC as required.*	X		
5	69	Open Burning	All	NA	When conducting open burning: -keep materials dry -separate non-combustibles -assure natural or artificially induced draft is present -separate from grass or peat moss -do not allow to smolder. Keep written records to demonstrate that the Permittee complies with the requirements of 18 AAC 50.065. Upon request by the Department, submit copies of the records.	*Recordkeeping*	X		
6	70	ADEC Requested Source Tests	All	NA	Conduct source testing as requested by the Department.	*Recordkeeping* *ADEC did not request any source tests during the certification period.*			X
6	71-79	General Source Testing Requirements	All	NA	Comply with the provisions of Section 6 when source tests are conducted.	*Recordkeeping/Source Test Plans/Source Test Reports* *Source tests during the certification period were conducted in accordance with Section 6 of the permit.*	X		
7	80	Recordkeeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		
7	81	Certification	All	All emission units, including insignificant emission units	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	82	Submittals	All	NA	Unless otherwise directed by the Department or the permit, send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping* *All reports were submitted to ADEC Fairbanks office except as noted below:* *Off-permit change notice: Submitted to Juneau due to familiarity of issue by ADEC personnel in Juneau.* *EI Report: Submitted to Juneau per ADEC request.* *Emission Fee Estimates: Submitted to Juneau per Condition 62.1.*	X		
7	83	Information Requests	All	NA	Upon request, furnish the Department with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping* *ADEC did not request any information during the certification period .*			X
7	84.1a	Excess Emission and Permit Deviation Reports	All	NA	Report emissions that present a potential threat to human health or safety and excess emissions that Permittee believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *Not applicable during the certification period.*			X
7	84.1b	Excess Emission and Permit Deviation Reports	All	NA	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *Emissions in excess of a technology-based emission standard that occurred in 2017 were discovered in 2018 and reported to ADEC as required.*	X		
7	84.1c(i)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations not described in Conditions 84.1a, 84.1b, and 84.1c(ii)-(iii) within 30 days of end of month in which the emissions or deviation occurred.	*Recordkeeping* *Not applicable during the certification period.*			X
7	84.1(c)(ii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping* *Not applicable during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	84.1(c)(iii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations according to the required deadline for failure to monitor, as specified in Conditions 5.2b and 9.1b.	*Recordkeeping* *Not applicable during the certification period.*			X
7	84.2	Excess Emission Reports	All	NA	Report excess emissions or permit deviations using the Department's online form or form in Section 13 Operating Permit No. AQ0489TVP02. Provide all information that is called for by the form that is used.	*Recordkeeping*	X		
7	84.3	Excess Emission and Permit Deviation Reports	All	NA	Provide a more detailed written report when requested by the Department.	*Recordkeeping* *No information was requested by ADEC regarding EE/PD reports during the certification period.*			X
7	85	Operating Report	All	NA	Submit an original and one copy of an Operating Report by May 15 for January 1 to March 31, by August 15 for April 1 to June 30, by November 15 for July 1 to September 30, and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
7	85.1	Operating Report	All	NA	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports*	X		
7	85.2	Operating Report	All	NA	When excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify in the Operating Report: a. date of deviation b. equipment involved c. permit condition affected d. description of excess emissions or permit deviations e. any corrective action or preventative measures taken and dates of such actions.	*Recordkeeping/ Operating Reports* *Not applicable during the certification period.*			X
7	85.3	Operating Report	All	NA	When excess emissions or permit deviations during the certification period have already been reported, cite the date(s) of those report(s) in the Operating Report.	*Recordkeeping/ Operating Reports*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	85.4	Operating Report	All	NA	The Operating Report shall include for the period covered by the report a listing of emissions monitored under Conditions 3.1e, 8.2, and 40.1a 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.	*Recordkeeping/ Operating Reports* *No additional monitoring required during the certification period.*			X
7	85.5	Operating Report	All	NA	For the first period of a renewed or revised operating permit, also provide the previous permit's (or previous permit version's) operating report elements covering that partial period immediately preceding the effective date of the renewed or revised permit.	*Operating Reports* *Not applicable during the certification period.*			X
7	86, 86.1, 86.3	Annual Compliance Certification	All	NA	- Submit to the Department an annual compliance certification report for the prior year by March 31. - Submit a copy of the annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping* *The annual compliance certification was sent to ADEC and EPA by March 31.*	X		
7	86.2	Annual Compliance Certification	All	NA	For the first period of a renewed or revised operating permit, also provide the previous permit's (or previous permit version's) annual compliance certification elements covering that partial period immediately preceding the effective date of the renewed or revised permit.	*Recordkeeping* *A single report was submitted that addressed requirements that were discontinued and added in conjunction with submittal of an application for a minor modification to the Rev 1 permit on 11/28/17. (The resulting permit is the "Interim Rev 2" permit.)*	X		
7	87.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs notifications and reports submitted to EPA with Operating Reports unless copies have already been provided to the Department at time of submittal.	*Recordkeeping/ Operating Reports*	X		
7	87.2	NSPS and NESHAP Reports	All	NA	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 that EPA approved during the effective duration of the permit.	*Recordkeeping* *ADEC did not request this information during the certification period.*			X
					Keep a copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule with the permit.	*Recordkeeping*	X		
7	88, 88.1, 88.2	Emission Inventory Reporting	All	NA	Every third year by March 31, submit to the Department reports of actual emissions, by emission unit, of CO, NH3, NOx, PM10, PM2.5, SO2, VOCs, Lead and Lead compounds using the form in Section 14 of the permit as outlined in Conditions 88.1 through 88.3. Reporting shall commence in 2018 for calendar year 2017, 2021 for the calendar year 2020, etc.	*Emission Inventory Reports*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	88.3	Emission Inventory Reporting	All	NA	For Emissions Inventory Reporting, include the required data elements contained within the form in Section 14 of the permit or those contained in Table 2A of Appendix A to Subpart A of 40 CFR 51 for each stack associated with an emission unit.	*Emission Inventory Reports*	X		
8	89	Permit Applications and Submittals	All	NA	Submit original applications to renew or modify the operating permit to the Department's Anchorage Office. A copy of any applications, compliance plan, or addenda shall also be submitted to EPA Region 10.	*Permit Applications* *No applications for permit renewal or modification were submitted during the certification period.*			X
8	90	Emissions Trading	All	NA	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.	*Advisory Condition*	X		
8	91	Off Permit Changes	All	NA	CPAI may make changes that are not addressed or prohibited by the permit, without permit revision, provided that the following requirements are met: 1) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; 2) For off permit changes that result in additional emission units that do not qualify as insignificant, CPAI shall submit contemporaneous notice to EPA and the Department describing the change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change; and 3) A record is kept describing changes made at the 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.	*Recordkeeping*	X		
8	92	Operational Flexibility	All	NA	CPAI may make 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 Clean Air Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions). For a change in operation, CPAI shall provide EPA and the Department with a notification no less than 7 days in advance of the proposed change. The notification shall include: - a brief description of the change; - 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.	*Recordkeeping* *Not triggered*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	93	Permit Renewal	All	NA	Submit an application to renew the Title V permit between 6 and 18 months before expiration of the current Title V permit. (No sooner than August 1, 2019 and no later than August 1, 2020.)	*Permit Renewal Application* *Not required during the certification period.*			X
9	94	General Compliance Requirements	All	NA	Compliance with permit terms and conditions is considered to be compliance with those requirements that are included and specifically identified in the permit or determined in writing in the permit to be inapplicable.	*Advisory Condition*	X		
9	95	General Compliance Requirements	All	NA	Comply with each permit term and condition.	*Compliance status is based on the status of compliance with all other permit conditions.* *There were no excess emissions or permit deviations during the certification period.*	X		
9	96	General Compliance Requirements	All	NA	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.	*Advisory Condition*	X		
9	97	General Compliance Requirements	All	NA	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: 1) enter upon the premises where a source subject to the permit is located or where records required by the permit are kept; 2) have access to and copy any records required by the permit; 3) inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and 4) sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.	*Recordkeeping*	X		
9	98	Compliance Schedule	All	NA	Comply with applicable requirements that become effective during the permit term on a timely basis.	*Recordkeeping/ NSPS Subpart OOOOa Reports* *NSPS Subpart OOOOa first became applicable to the Alpine CPF on 2/15/2017 at the CD2 drill site. Documentation of this new applicable requirement was submitted to ADEC in an off-permit change notification on 2/15/2018.*	X		

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 7
Alpine CPF 4Q

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period October 11 through December 31, 2018

Air Quality Operating Permit No. AQ0489TVP02 (Revision 2)

ConocoPhillips Alaska, Inc.

Alpine Central Processing Facility

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

ED_004016I_00012166-00224

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	1	Visible Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 108, 109:*** *monitoring not required; reasonable inquiry* ***Diesel fuel-fired EU IDs 211, 212, 621, 622, 742 (heaters only), 839:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 415, 416:*** *reasonable inquiry* ***Flare EU ID 417:*** *did not operate during the certification period*	X		
3	1.1, 7.1	Visible Emissions & Particulate Matter	1-3, 5, 106, 107, 110, 518-520	Fuel-Fired Equipment	Burn only gas as fuel. State in each Operating Report that each of these emission units burned only gas.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas*	X		
					Submit a Permit Deviation report if any of these emission units burn any fuel other than gas.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	1.2, 7.2	Visible Emissions & Particulate Matter	211, 212, 621, 622	Diesel-Fired Equipment	If these emission units did not operate more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Compliance with visible emissions and particulate matter standards is certified based on reasonable inquiry for these units.*	X		
3	1.3	Visible Emissions	211, 212, 621, 622	Diesel-Fired Equipment	If these emission units operated more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitor, record, and report in accordance with Conditions 3 through 5 for the remainder of the permit term.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Monitoring not required.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	1.4, 7.4	Visible Emissions & Particulate Matter	4, 108, 109	Dual Fuel-Fired Equipment	Include a statement in each operating report indicating whether each of the emission unts fired gas as the primary fuel during the period covered by the report.	*Recordkeeping/ Operating Reports* ***Dual fuel-fired EU IDs 4, 108 and 109*** *fired gas as the primary fuel during the certification period as stated in the Operating Reports.*	X		
					If these emission units operated on liquid fuel, but not more than 400 hours per calendar year, monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards, per Condition 14.1.	*Recordkeeping/ Operating Reports* ***Dual fuel-fired EU ID 4*** *burned liquid fuel during the certification period but not more than 400 hours during the calendar year.* ***Dual fuel-fired EU ID 108*** *burned only gas during the certification period; liquid fuel was burned during the calendar year but not more than 400 hours.* ***Dual fuel-fired EU ID 109*** *burned only gas during the certification period and during calendar year 2018.* *Compliance with the visible emissions and PM standards is certified based on reasonable inquiry for these units.*	X		
					If these emission units operated on liquid fuel for more than 400 hours per calendar year, monitor, record, and report according to Conditions 14.2, 14.3, and 14.4 (Method 9 observations).				X
3	1.5, 7.5	Visible Emissions & Particulate Matter	742 (heaters only), 839	Dual Fuel-Fired Equipment	Monitoring shall consist of an annual certification of compliance with the visible emissions and particulate matter standards based on reasonable inquiry.	***Diesel fuel-fired EU IDs 742 (heaters only) and 839:*** *Compliance with the visible emissions and PM standards is certified based on reasonable inquiry for these insignificant emissions units.*	X		
3	1.6	Visible Emissions	415-417	Flares	Monitor, record, and report in accordance with Condition 6.	*Recordkeeping/ Operating Reports* ***Flare EU IDs 415 and 416:*** *Method 9 observations and reasonable inquiry.* ***Flare EU ID 417*** *did not operate during the certification period.*	X		
3	2	Visible Emissions	313, 314	Incinerators	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Recordkeeping/ Operating Reports* ***Incinerator EU IDs 313 and 314:*** *Method 9 observations and reasonable inquiry*	X		
3	2.1	Visible Emissions	313, 314	Incinerators	Perform a Method 9 visible emissions observation for each unit once per calendar year during which each unit operates, or upon request by the Department.	*Recordkeeping/ Operating Reports*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	2.2	Visible Emissions	313, 314	Incinerators	Record and report visible emissions observations in accordance with Conditions 4 and 5.	*Recordkeeping/ Operating Reports*	X		
3	3, 3.1	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If triggered under Condition 1.3 for any of these emission units, including a liquid fuel-burning engine used as a replacement for each existing emission unit, Method 9 observations must be conducted for 18 minutes to obtain 72 individual 15-second readings.	*Recordkeeping*			X
3	3.1a(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If any of these emission units exceeds the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)], and each liquid fuel-burning unit used as a replacement for each existing emission unit that has exceeded the applicable operational threshold for that unit, conduct an initial Method 9 observation for 18 minutes within 30 days after the calendar month during which that threshold has been exceeded, or during the next scheduled operation, whichever is later.	*Recordkeeping* *None of these emissions units exceeded its Method 9 operating hour threshold during the certification period and none were replaced.*			X
3	3.1b	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	Method 9 observations must be conducted at least once each calendar month that the emission unit operates after the initial Method 9 observation until the allowance in Condition 3.1c for reduced monitoring is satisfied.	*Recordkeeping*			X
3	3.1c(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	After observing emissions for three consecutive operating months under Condition 3.1b, unless a six-minute average opacity is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions for 18 minutes within six months after the preceding observation until the allowance in Condition 3.1d for reduced monitoring is satisfied.	*Recordkeeping*			X
3	3.1c(ii)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	For an emission unit with intermittent operations, the observation required under Condition 3.1c(i) must be taken during the next scheduled operation immediately following six months after the preceding observation.	*Recordkeeping*			X
3	3.1d(i)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	After completing at least two semiannual 18-minute observations under Condition 3.1c, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.	*Recordkeeping*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	3.1d(ii)	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	For an emission unit with intermittent operations, the observation required under Condition 3.1d(i) must be taken during the next scheduled operation immediately following twelve months after the preceding observation.	*Recordkeeping*			X
3	3.1e	Visible Emissions Monitoring - Method 9 Plan	211, 212, 621, 622	Diesel-Fired Equipment	If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations is greater than 20 percent, increase and maintain monitoring frequency to monthly until the criteria in Condition 3.1c is met.	*Recordkeeping*			X
3	4, 4.1	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, record all data required by Condition 4.1 on the Observation Form in Section 11 of the permit.	*Recordkeeping*			X
3	4.2	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, determine the six-minute average opacity as described in Condition 4.2.	*Recordkeeping*			X
3	4.3	Visible Emissions Recordkeeping	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conduction Method 9 observations, calculate and record the highest six-minute and 18-consecutive-minute average opacities observed.	*Recordkeeping*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	5, 5.1	Visible Emissions Reporting	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	When conducting Method 9 observations, report all data required by Condition 5.1.	*Recordkeeping/ Operating Reports*			X
3	5.2a	Visible Emissions EE Reporting	1-4, 106-109, 211, 212, 313, 314, 415-417, 518, 621, 622	Fuel-Fired Equipment	Submit an Excess Emissions report if the result of a Method 9 observation exceeds the applicable emissions standard/ limit under Conditions 1, 16, or 17.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	5.2b	Visible Emissions PD Reporting	211, 212, 313, 314, 621, 622	Fuel-Fired Equipment	Submit a Permit Deviation report if monitoring required under Conditions 2.1 or 3 was not performed when required. Submit the report within three days of the date when monitoring was required.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	6, 6.1	Visible Emissions Monitoring	415-417	Flares	Observe one daylight flare event within 12 months after the preceding flare event observation or within 12 months after the permit effective date, whichever is later. Use Method 9.	*Recordkeeping* ***Flare EU IDs 415 and 416*** *- Method 9 observations (July 2018 - the next planned daylight flare events after the last such event in August 2016)* ***Flare EU ID 417*** *- Did not operate during the certification period.*			X
					If there is no flare event within that 12-month period, then the Permittee shall observe the next daylight flare event using Method 9.		X		
3	6.2	Visible Emissions Monitoring	415-417	Flares	For each observed flare event, record: 1) the flare emission unit ID number 2) results of the Method 9 observations 3) reason(s) for flaring 4) date, beginning and ending time of event 5) volume of gas flared.	*Recordkeeping*	X		
3	6.3	Visible Emissions Monitoring	415-417	Flares	If more than 12 months have elapsed since the last flare event was monitored, and monitoring was postponed, explain why the event was not monitored in the next Operating Report.	*Recordkeeping/ Operating Reports*			X

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							Continuous	Intermittent	Not Triggered
3	6.4	Visible Emissions Reporting	415-417	Flares	Include in the Operating Report copies of the records required by Condition 6.2.	*Operating Reports*	X		
3	6.5	Visible Emissions EE/PD Reporting	415-417	Flares	Submit an Excess Emissions report if Method 9 observation of the flares results in an average opacity >20 percent over any six consecutive minutes.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
					Submit an Permit Deviation report if the monitoring required under Condition 6 is not completed, except as allowed under Condition 6.3.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	6.6	Visible Emissions Reporting	415-417	Flares	If no flare events are monitored during a certification period, submit an annual certification of compliance with the visible emissions standard.	*Reasonable inquiry* *Compliance Certification Report*	X		
3	7	Particulate Matter	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	PM emitted from these emission units shall not exceed 0.05 grains/dscf of exhaust gas corrected to standard Conditions and averaged over 3 hours.	*Recordkeeping/ Operating Reports* ***Gas-fired EU IDs 1-3, 5, 106, 107, 110, 518 - 520:*** *burned only gas* ***Dual fuel-fired EU IDs 4, 108, 109:*** *monitoring not required; reasonable inquiry* ***Diesel fuel-fired EU IDs 211, 212, 621, 622, 742 (heaters only), 839:*** *monitoring not required; reasonable inquiry* ***Flare EU IDs 415, 416:*** *reasonable inquiry* ***Flare EU ID 417:*** *did not operate during the certification period*	X		
3	7.3	Particulate Matter	211, 212, 621, 622	Diesel-Fired Engines	If these emission units operated more than the trigger values in permit Table C [80 hours (EU ID 211), 200 hours (EU IDs 212 and 621) and 530 hours (EU ID 622)] in one calendar year, monitor, record, and report PM emissions in accordance with Conditions 8 through 10, for that unit for the remainder of the permit term.	*Recordkeeping/ Operating Reports* ***Diesel fuel-fired EU IDs 211, 212, 621, and 622*** *did not operate more than the trigger thresholds during the calendar year.* *Monitoring not required.*			X
3	7.6	Particulate Matter	415-417	Flares	Annually certify these emission units were in compliance with the PM standard.	*Compliance certified based on reasonable inquiry*	X		

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							Continuous	Intermittent	Not Triggered
3	8, 8.1, 8.2, 8.4	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Conduct a PM source test or repair equipment no later than 6 months after a Method 9 observation results in an 18-minute average opacity >20 percent. (For stacks with a diameter less than 18 inches, conduct a source test if the 18-minute average opacity is greater than 15% and not more than 20%, unless the Department has waived this requirement in writing.) (This requirement is waived if a PM source test on the unit has shown compliance with the PM standard during the permit term.)	*Method 9/ Recordkeeping* *PM source test not required during the certification period.*			X
3	8.1b	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	If repairs are made to correct an exceedance of the criteria in Condition 8.2, perform a Method 9 observation under similar load conditions as during the exceedance to ensure corrected performance.	*Method 9/ Recordkeeping* *Repairs not required during the certification period.*			X
3	8.3	PM Monitoring	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	During each PM source test, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.	*Not applicable. Monitoring not required.*			X
3	9	PM Recordkeeping	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Keep records of the results of any source test and visible emissions observations conducted under Condition 8.	*Not applicable. Monitoring not required.*			X
3	10.1a	PM EE Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Submit an Excess Emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	10.1b	PM PD Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Submit a Permit Deviation report if testing or repairs required under Condition 8.1 were not performed within 6 months of triggering the requirement. This report is due within one day after not meeting the 6-month deadline.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	10.2	PM Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Report observations in excess of the thresholds in Condition 8.2b within 30 days of end of month in which observations occur.	*Not applicable. Reporting not required.*			X
3	10.3	PM Reporting	4, 211, 212, 621, 622	Dual Fuel-Fired Turbine Diesel-Fired Engines	Include with each Operation Report: (i) The dates, EU ID(s), and results when an observed 18-minute average exceeded an applicable threshold in Condition 8.2 (15%/20%) (ii) A summary of the results of any PM testing under Condition 8; and (iii) Copies of any visible emissions observation results that exceed the thresholds in Condition 8.2, if not already submitted.	*Not applicable. There were no visible emissions observations for these units.* *PM source testing not required.*			X
3	11, 11.1, 11.2, 11.4	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	Conduct a PM source test or take corrective action (while firing liquid fuel) no later than 6 months after a Method 9 observation results in an 18-minute average opacity >20 percent. (This requirement is waived if a PM source test on the unit has shown compliance with the PM standard during the permit term.)	*Method 9/ Recordkeeping* *PM source test not required during the certification period.*			X
3	11.1b	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	Take corrective action and conduct two 18-minute visible emissions observations in a consecutive six-month period to show that emissions no longer exceed the criteria described in Condition 11.2.	*Method 9/ Recordkeeping* *Corrective action not required during the certification period.*			X
3	11.3	PM Monitoring	108, 109	Dual Fuel-Fired Heaters	During each PM source test, observe the exhaust for 60 minutes in accordance with Method 9 and calculate the highest average 6-minute opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.	*Not applicable. Monitoring not required.*			X

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							Continuous	Intermittent	Not Triggered
3	12	PM Recordkeeping	108, 109	Dual Fuel-Fired Heaters	Keep records of the results of any PM testing and visible emissions observations conducted under Conditions 11 and 14.	*Not applicable. Monitoring not required.*			X
3	13.1	PM Reporting	108, 109	Dual Fuel-Fired Heaters	Include with each Operation Report: (i) The dates, EU ID(s), and results when an observed 18-minute average exceeded an applicable threshold in Condition 11.2 (20%) (ii) A summary of the results of any PM testing and visible emissions observations under Condition 11.	*Not applicable. Visible emissions observations not required. PM source testing not required.*			X
3	13.2	PM EE Reporting	108, 109	Dual Fuel-Fired Heaters	Submit an Excess Emissions report any time the results of a PM source test exceed 0.05 grains/dscf averaged over 3 hours.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	14	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Monitor, record, and report the monthly hours of operation when operating on back-up liquid fuel.	*Recordkeeping/ Operating Reports*	X		
3	14.1	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	If each emission unit did not exceed 400 hours of operation on back-up liquid fuel during the calendar year, monitoring shall consist of annual certification of compliance with the visible emissions and PM standards.	*Recordkeeping/ Reasonable Inquiry* *None of these emission units operated more than 400 hours on liquid fuel during the certification period.* *Compliance with the visible emissions and particulate matter standards has been determined based on reasonable inquiry.*	X		
3	14.2	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Notify the Department and perform a Method 9 visible emissions observation 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 back-up liquid fuel or during the next scheduled operation on back-up liquid fuel, whichever is later.	*ADEC Notification/ Recordkeeping/ Method 9*			X
3	14.3	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	When required by Condition 14.2, conduct Method 9 observations when operating on back-up liquid fuel for a duration of 18 minutes to obtain 72 consecutive 15-second readings.	*Not applicable. Monitoring not required.*			X
					If the observation exceeds the limit in Condition 1, monitor according to Condition 8 or Condition 11, as applicable by the type of emission unit.	*Not applicable. Monitoring not required.*			X

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							Continuous	Intermittent	Not Triggered
3	14.4	Visible Emissions and PM MR&R	4, 108, 109	Dual Fuel-Fired Units	Record and report visible emissions observations and PM testing results in accordance with Conditions 4, 5, 10, 12, and 13, as applicable by the type of emission unit.	*Not applicable. Monitoring not required.*			X
3	14.5	Visible Emissions and PM PD Reporting	4, 108, 109	Dual Fuel-Fired Units	Submit a Permit Deviatoin report if MR&R under Condition 14.2, 14.3, or 14.4 was not performed.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	15	Sulfur Compound Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Sulfur compound emissions from these emission units, expressed as SO_2, shall not exceed 500 ppm averaged over three hours.	*Recordkeeping and SO_2 material balance*	X		
3	15.1	Sulfur Compound Emissions	1-5, 106-110, 211, 212, 415-417, 518-520, 621, 622, 742 (heaters only), 839	Fuel-Fired Equipment	Comply with the liquid fuel sulfur content limit of 0.11 wt% sulfur (permit Condition 20) and the fuel gas H2S content limit of 200 ppmv (permit Condition 21).	*Recordkeeping/ Operating Reports*	X		
3	15.2	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, obtain from the plant the results of a monthly fuel sulfur analysis.	*Recordkeeping* *Alpine does not receive fuel oil from a North Slope topping plant.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	15.2a	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, include a list of monthly measured fuel sulfur content results in the Operating Report.	*Operating Reports* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	15.2b	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, calculate SO_2 emissions in PPM using either the SO_2 material balance calculation in permit Section 12 or Method 19 of 40 CFR 60 Appendix A-7 if the fuel sulfur content exceeds 0.75% by weight.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	15.2c	Sulfur Compound Emissions - EE Reporting for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, submit an Excess Emissions report if the SO2 emissions calculated under Condition 15.2b exceed 500 ppm, and include the calculation from Condition 15.2b.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	15.2d	Sulfur Compound Emissions - for Arctic Diesel Fuel	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a North Slope topping plant, report the calculated SO_2 emissions in PPM in the Operating Report for fuel with a sulfur content greater than 0.75% by weight.	*Recordkeeping and SO_2 material balance* *Alpine does not receive fuel oil from a North Slope topping plant.*			X
3	15.3	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	Comply with either Condition 15.3a or 15.3b for liquid fuel obtained from a third-party supplier.	*Recordkeeping* *CPAI complies with Condition 15.3a.*	X		

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							Continuous	Intermittent	Not Triggered
3	15.3a(i)	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, if the fuel grade requires a sulfur content less than 0.11 percent by weight, keep receipts that specify the fuel grade, maximum sulfur content of the fuel grade, and amount received.	*Recordkeeping* *ULSD fuel requires a sulfur content less than 0.11% by wt. Fuel shipment receipts are maintained.*	X		
3	15.3a(ii)	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, comply with Condition 15.3b or, if the fuel grade does not require a sulfur content less than 0.11 percent by weight, keep receipts that specify the fuel grade and amount received, and (A) test the fuel for sulfur content using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17; 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.	*Recordkeeping* *Not required - Alpine burns ULSD fuel which requires a sulfur content less than 0.11% by wt.*			X
3	15.3b	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, analyze at least monthly the sulfur content of the fuel in each storage tank that supplies fuel for use by these units using an appropriate method listed in 18 AAC 50.035(b)-(c) or 40 C.F.R. 60.17.	*Recordkeeping* *CPAI has elected to comply with Condition 15.3a(i).*			X
3	15.4	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, if a shipment of fuel under Condition 15.3a contains greater than 0.75 percent sulfur by weight or the results of the sample analyses under Condition 15.3b indicate that the stored fuel contains greater than 0.75 percent sulfur by weight, calculate SO2 emissions in ppm using either the Material Balance Calculation shown in Section 12 of the permit or Method 19 of 40 C.F.R. 60, Appendix A-7.	*Recordkeeping*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	15.5a	Sulfur Compound Emissions - EE Reporting for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, submit an Excess Emissions report if the SO2 emissions calculated under Condition 15.4 exceed 500 ppm, and include the calculation from Condition 15.4.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	15.5b	Sulfur Compound Emissions - for Other Fuel Oil	4, 108, 109, 211, 212, 621, 622, 742 (heaters only), 839	Liquid Fuel-Fired Equipment	For liquid fuel from a third party supplier, include in Operating Reports: (i) a list of the fuel grades received; (ii) for any fuel grade with a maximum fuel sulfur content greater than 0.11% by weight, the fuel sulfur content of each shipment; (iii) the results of all fuel sulfur analyses conducted under Condition 15.3 and documentation of the method(s) used to complete the analyses; and (iv) for fuel with a sulfur content greater than 0.75 percent, the SO2 emissions in ppm calculated under Condition 15.4.	*Operating Reports*	X		
3	15.6a	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415, 416, 518-520	Fuel Gas Burning Equipment	Analyze a representative sample of the fuel gas at least monthly to determine the sulfur content using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 CFR 60.17.	*Recordkeeping/ Operating Reports* *Analysis Method: ASTM D4810-06*	X		
3	15.6b	Sulfur Compound Emissions - for Fuel Gas	417	Portable Flares	Analyze a sample of the fuel gas burned by EU ID 417 at least once in any month that any portable flare operates using either ASTM D4084, D5504, D4810, D4913, D6228 or GPA Standard 2377, or a listed method approved in 18 AAC 50.035(b)-(c) or 40 CFR 60.17.	*Recordkeeping/ Operating Reports* *Portable flares did not operate during the certification period.*			X
3	15.7a	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415, 416, 518-520	Fuel Gas Burning Equipment	Keep records of the fuel gas sulfur analyses conducted under Condition 15.6.	*Recordkeeping*	X		
3	15.7b	Sulfur Compound Emissions - for Fuel Gas	417	Portable Flares	Keep records of each month that any portable flare authorized under the permit operates.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	15.8a	Sulfur Compound Emissions - EE Reporting for Fuel Gas	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Submit an Excess Emissions report if sulfur compound emissions, expressed as SO2, from any emission unit exceeds 500 ppm averaged over 3 hours, or the H2S content exceeds a limit in Table D (Condition 16), Table E (Condition 17), or Condition 21, as applicable to each unit.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	15.8b	Sulfur Compound Emissions - for Fuel Gas	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Include copies of the fuel gas sulfur analysis records required by Condition 15.7 with the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	16	Turbine BACT	1, 2	Turbines	Install LHE liners and implement good operational practices to minimize emissions.	*Vendor specifications and good operational practices*	X		
3	16	Turbine BACT	3, 4, 5	Turbines	Install dry low NOx combustors and implement good operational practices to minimize emissions.	*Vendor specifications and good operational practices*	X		
3	16	Turbine BACT Emission Limits	1-5	Turbines	Actual emissions from turbines shall be limited as indicated in Table D of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data/ load limitation, installation of BACT controls, low sulfur fuels, good operational practices and parametric monitoring.*	X		
3	16.1	Turbine BACT	1-5	Turbines	Maintain records that are available for inspection demonstrating that these units are maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		
3	16.2a(i)	Turbine BACT (NOx and CO Stack Testing)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Except as specified in Condition 16.2a(ii), conduct NOx and CO source tests. Record the turbine intake temperature and load throughout each run. Source test reports shall provide the average load and average intake temperature for each test run, NOx and CO emissions in lb/hr, NOx emissions in ppmvd corrected to 15% O2 ISO conditions, and CO emissions in ppmvd for each load tested.	*Source test reports*	X		
3	16.2a(ii)	Turbine BACT (CO Stack Testing)	1	Injection Turbine (C1)	When triggered by Condition 16.2a(iii), conduct a winter CO source test in accordance with Condition 38 to demonstrate compliance with short-term BACT CO emission limit of 120 lb/hr @ 50% < load <= 60% & turbine intake temperature < 0 °F. Record turbine intake temperature and load throughout each run. Include in the source test report the average load and average intake temperature for each test run, and CO emissions in lb/hr and ppmvd.	*Recordkeeping* *The operating threshold in Condition 16.2a(iii) was not exceeded during the certification period.* *No monitoring required.*			X
3	16.2a(iii)	Turbine BACT (CO Stack Testing)	1	Injection Turbine (C1)	The trigger event for the winter CO source testing under Condition 16.2a(ii) is 167 hours of operation in any consecutive 12-month period at loads between 50% and 60% with intake temperatures < 0 °F.	*Advisory Condition*	X		

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							Continuous	Intermittent	Not Triggered
3	16.2b(i)	Turbine BACT (NOx Stack Testing)	4, 5	Solar Turbines (S1 & S2)	Conduct NOx source tests for each fuel type (rich fuel gas and liquid fuel). Monitor and record the fuel consumption rate and electrical power-generating rate during each test run, and include the recorded operation data with the stack emissions test report. The source test reports shall provide NOx emissions in lb/hr and ppmv corrected to 15% O2.	*Source test reports*	X		
3	16.2b(ii)	Turbine BACT (CO Stack Testing)	4, 5	Solar Turbines (S1 & S2)	Conduct summer CO source tests while operating in low emissions mode and winter CO source test. Determine the CO emission rate and concentration for each fuel type (rich fuel gas and liquid fuel), using exhaust properties determined by both Method 19 and exhaust gas measurements. Monitor and record the fuel consumption rate and electrical power-generating rate during each test run, and include the recorded operation data with the stack emissions test report. Source test reports provide CO emissions in lb/hr and ppmv corrected to 15% O2.	*Source test reports*	X		
3	16.2b(iii)	Turbine BACT (NOx and CO Stack Testing)	4	Solar Turbine (S1)	Conduct NOx and CO source tests on backup liquid fuel within 12 months of operating 400 hours or more in any consecutive 12-month period on liquid fuel, and if the latest test results were less than or equal to 90 percent of the applicable limit in Table D of the permit and it also has been four years or more since a source test while firing liquid fuel was completed.	*Recordkeeping* *Operating time threshold on liquid fuel not exceeded during the certification period.* *Monitoring not required.*			X
3	16.2b(iv)	Turbine BACT (NOx and CO Stack Testing)	4, 5	Solar Turbines (S1 & S2)	Conduct NOx and CO source tests on backup lean fuel gas within 12 months of operating 400 hours or more in any consecutive 12-month period on lean fuel gas, and if the latest test results were less than or equal to 90 percent of the applicable limits in Table D of the permit and it also has been four years or more since a source test while firing lean fuel gas was completed.	*Recordkeeping* *Operating time threshold on backup lean fuel gas not exceeded during the certification period.* *Monitoring not required.*			X
3	16.2c	Turbine BACT (Fuel Gas H2S MR&R)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Monitor, record, and report the fuel gas sulfur content in accordance with Conditions 15.6 through 15.8 to demonstrate compliance with short-term turbine BACT SO2 emission limits in Table D of the permit.	*Recordkeeping/ Operating Reports* *Monitoring according to Condition 15.6*	X		

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							Continuous	Intermittent	Not Triggered
3	16.2d	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Conduct annual visible emission observations, the first to be completed within 12 months of the effective date of the permit to demonstrate compliance with the short-term turbine BACT PM (opacity) emission limit in Table D of the permit.	*Recordkeeping/ Method 9*	X		
3	16.2d(i), 16.2d(ii)	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Conduct subsequent visible emission observations within 12 months after the preceding observation. If the unit has intermittent operations, subsequent visible emission observations may be completed during the next scheduled operation immediately following the preceding observation.	*Recordkeeping/ Method 9*	X		
3	16.2d(iii)	Turbine BACT (Opacity Readings)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Record and report visible emissions observation results as required by Conditions 4, 5.1, and 5.2a compared to the 10 percent opacity BACT limit.	*Recordkeeping/ Operating Reports*			X
3	16.3	Turbine BACT EE Reporting	1-5	Turbines	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	16.4	Turbine BACT Limits	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Monitor, record, and report in accordance with Condition 16.4 to demonstrate compliance with the annual BACT CO emission limits in Table D of the permit.	*Good Combustion Practices/ Recordkeeping/ Parametric Monitoring/ Operating Reports*	X		
3	16.4a	Turbine BACT Recordkeeping	1	Injection Turbine (C1)	When using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 16.4d(ii), use a 1-hour averaging period for loads above 40 percent, except during startup and shutdown. During startup and shutdown, use a time weighted 3-hour averaging period for loads above 40 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period.	*Recordkeeping*	X		
3	16.4b	Turbine BACT Recordkeeping	2	Generator Turbine (E1)	When using a predictive emissions correlation to estimate hourly emissions as allowed under Condition 16.4d(ii), use a 1-hour averaging period for loads above 10 percent, except during startup and shutdown. During startup and shutdown, use a time weighted 3-hour averaging period for electrical loads above 10 percent. At the end of 3 hours, the averaging period shall revert to a 1-hour averaging period.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	16.4c	Turbine BACT Recordkeeping	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	During startup, shutdown, malfunction, mapping of EU ID 3, and for loads not included in Table D of the permit (C1 load <= 40%, E1 load <= 10%, E2 load <= 40%), use the following CO emission rates for calculating the 12-month rolling emissions: (i) 884 lb/hr for EU ID 1; (ii) 145 lb/hr for EU ID 2; and (iii) 14.6 lb/hr for EU ID 3.	*Recordkeeping*	X		
3	16.4d	Turbine BACT Recordkeeping	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Calculate and record the annual (consecutive 12-month) CO emissions for each of EU IDs 1 through 3 as follows: (i) Determine the time each unit operates each month within the unit-specific load ranges provided in Table D of the permit. (ii) Multiply the monthly load-specific operating times by the corresponding unit-specific, load-based hourly emission rates using the predictive emissions correlation for the specific unit, or the unit-specific emission rates from either Table D of the permit or Condition 16.4c, as applicable, and sum the various calculated load-based emission rates to obtain a monthly total CO emission rate for each of EU IDs 1, 2, and 3.	*Recordkeeping* *Emissions are calculated using the predictive emissions correlation that applies to each turbine.*	X		
					(iii) Determine the 12-month rolling total CO emissions for each of EU IDs 1 through 3 by summing the calculated total monthly unit-specific CO emission rates from Condition 16.4d(ii) to the unit-specific emission rates calculated for the previous 11-months.	*Recordkeeping/ Operating Reports*	X		
3	16.4e	Turbine BACT Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Include in the Operating Report the monthly and the consecutive 12-month summation of CO emissions recorded in Condition 16.4d for each of EU IDs 1 through 3 for each month of the reporting period.	*Operating Reports*	X		
3	16.5a	Turbine BACT EE Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Submit an Excess Emissions report if the consecutive 12-month summation of CO emissions from any of EU IDs 1 through 3 exceed the annual emission limit in Table D of the permit.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	16.5b	Turbine BACT Reporting	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If the consecutive 12-month summation of CO emissions from any of EU IDs 1 through 3 exceed the annual emission limit in Table D of the permit, perform a revised BACT analysis on each turbine that exceeds an annual BACT limit and submit a copy to the Department of the analysis within 90 days of discovery of the exceedance.	*Revised BACT Analysis* *No excess emissions during the certification period.*			X
3	16.6a	Turbine BACT (Low Load CO Operational Restrictions)	1	Injection Turbine (C1)	Do not operate the turbine at less than 40 percent load except during startup, shutdown, and process upsets.	*Recordkeeping*	X		
					During startup, shutdown, and process upsets, operation below 40 percent load shall be limited to 90 minutes per event.	*Recordkeeping*	X		
3	16.6b	Turbine BACT (Low Load CO Operational Restrictions)	2	Generator Turbine (E1)	Do not operate the turbine at less than 10 percent electric load except during startup, shutdown, and process upsets.	*Recordkeeping*	X		
					During startup, shutdown, and process upsets, operation below 10 percent electrical load shall be limited to 60 minutes per event.	*Recordkeeping*	X		
3	16.6c	Turbine BACT (Low Load CO Operational Restrictions)	3	Generator Turbine (E2)	Do not operate the turbine at less than 40 percent electric load except during startup, shutdown, process upsets, and during mapping of the turbine.	*Recordkeeping*	X		
					During startup, shutdown, and process upsets, operation below 40 percent electrical load shall be limited to 60 minutes per event.	*Recordkeeping*			X
					During mapping, operation below 40 percent electrical load shall be limited to 180 minutes per event.	*Recordkeeping* *Turbine mapping did not occur during the certification period.*			X
3	16.6d	Turbine BACT (Low Load CO Operational Restrictions)	1-3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Document in the Operating Report all process upsets that result in any turbine operating at less than the loads specified in Conditions 16.6a, 16.6b, and 16.6c for EU IDs 1, 2, and 3, respectively. Each report includes the cause of the upset, the duration of the upset, and what action was taken to minimize CO emissions.	*Recordkeeping/ Operating Reports*	X		
3	16.6e	Turbine BACT (Low Load CO Operational Restrictions)	3	N-P PGT10+ Turbine (E2)	Record of the date, start time, and end time when mapping occurs for EU ID 3.	*Recordkeeping* *Turbine mapping did not occur during the certification period.*			X

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	16.7a	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Except during transient operations of startup and shutdown of EU IDs 2, 4, or 5, turbine intake temperatures less than 0°F, periods of emissions testing, and periods when EU IDs 4 or 5 operate in lead (isochronous) mode due to EU ID 2 being out of service, operate EU IDs 4 and 5 out of low emissions mode for no more than 48 hours in any consecutive 12-month period.	*Recordkeeping*	X		
3	16.7b	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Do not operate the turbines in lead (isochronous) mode while EU ID 2 is operating, except during startup and shutdown of EU ID 2 or during required emissions testing.	*Recordkeeping*	X		
3	16.7c	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Monitor the pilot valve command signal to verify operation in low emissions mode. For each turbine, record the date, time, and duration; turbine intake temperature; gas producer speed; T5 temperature; power level; and whether each occurance is due to startup, shutdown, subzero turbine intake temperatures, periods of required emission testing, or load change when either of these emission units is in lead (isochronous) mode due to EU ID 2 being out of service or out of lead (droop) mode.	*Recordkeeping*	X		
3	16.7d	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Summarize in the Operating Report the monthly total time and consecutive 12-month total time that each of EU IDs 4 and 5 operate out of low emissions mode for each month of the reporting period. Include in the report the information recorded under Condition 16.7c for each event of operations out of low emissions mode during the reporting period.	*Operating Reports*	X		
3	16.7e	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Monitor and record the date, time and unit number for periods when these emission units burn rich fuel gas.	*Recordkeeping*	X		
3	16.7f	Turbine BACT (NOx BACT Operational Requirements)	4	Solar Taurus (S1)	Monitor and record the date, time, and unit number for periods when this emission unit burns liquid fuel.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	16.7g	Turbine BACT (NOx BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 16.7c shows that pilot valve movement to the intermediate or full open position (operation out of low emissions mode) exceeds 48 hours in any 12 consecutive month period other than during exceptions listed (see permit Condition 16.7g), within 90 days of exceeding 48 hours, propose corrective action to overcome operation out of low emissions mode and monitor process parameters hourly and calculate the NOx concentration using a predictive correlation developed and approved by the department under Condition 16.8 and as revised based on results of any annual relative accuracy (RA) stack test required by Condition 16.8b.	*Recordkeeping*			X
3	16.8a	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	For any of these emission units, if the Permittee elects to develop load-based CO emission rates using a predictive emissions correlation (as allowed under Condition 16.4d(ii)), develop a predictive correlation between CO emission rates from stack tests and turbine process parameters as outlined in Conditions 16.8a(i) - (vi).	*Recordkeeping* *In 2005, CPAI developed a predictive CO emissions correlation and submitted it to the Department during preparation of the application to revise the CO BACT limits established under permit AQ0489CPT08. The application resulted in issuance of permit AQ0489MSS03.* *During a March 14, 2017 conference call on the topic of the CO PEMS for EU IDs 1, 2, 3, the Department agreed that the 2005 submittal and the Departments's subsequent acceptance of the predictive CO emissions correlation and incorporation of the emissions correlation into permit AQ0489MSS03 satisfy the notification, source testing, submittal, and approval requirements of Conditions 16.8a(i), 16.8a(ii) and 16.8a(iii)* ***[formerly Conditions 15.8a(i), 15.8a(ii) and 15.8a(iii) in the prevision version of the permit]***.	X		
3	16.8a(i)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If elected under Condition 16.4d(ii), notify the Department of intention to develop a predictive correlation for **CO** emission monitoring, and submit a stack test plan to the Department, that includes: (A) identification of the proposed process parameters for which the Permittee elects to measure a parametric monitoring correlation, and (B) a description of the monitoring methodology accuracy and precision of methodology and sampling rates of each parameter.	*Recordkeeping* *See Method statement for Condition 16.8a.*	X		

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							Continuous	Intermittent	Not Triggered
3	16.8a(ii)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If elected under Condition 16.4d(ii), if stack testing has not occurred within 24 months preceding the time when the Permittee elects to use a **CO** emissions predictive correlation method, conduct Reference Method (RM) stack tests in accordance with permit Section 6 at four load settings specified in 40 CFR 60.335(b)(2) on the emission unit(s) (EU ID 1, 2, and/or 3) for which the correlation is to be developed. (The results of a stack test conducted in the previous 24 months may be substituted provided the test meets the RM requirements and is approved by the Department.)	*Recordkeeping* *See Method statement for Condition 16.8a.*	X		
3	16.8a(ii)(A)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	During the RM stack tests required under Conditions16.8a(ii), 16.8b(i)(A), and 16.8b(i)(E)(3), collect and record the process parameters identified in Condition 16.8a(i)(A) for the purpose of developing or testing parametric correlations for CO emission rates.	*Recordkeeping* *See Method statement for Condition 16.8a.*	X		
3	16.8a(ii)(B)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Using the RM stack tests results from Condition 16.8a(ii), develop predictive correlations for emission rates based on turbine process parameters (the correlation may be based on vendor data as well as RM stack tests).	*Recordkeeping* *See Method statement for Condition 16.8a.*	X		
3	16.8a(iii)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Within 60 days after completing the RM tests required under Condition 16.8a(ii) or revising a predictive correlation as required by Condition 16.8b(i)(E)(1), submit to the Department for written approval a report that describes the predictive correlation development or revision, including the methodology, assumptions, analysis (with sample calculations), supporting notes, and a list of all process parameters used in the correlations with an analysis of their statistical relevance for the correlation (i.e., an r^2 analysis of curve fit)	*Recordkeeping* *See Method statement for Condition 16.8a.*	X		

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							Continuous	Intermittent	Not Triggered
3	16.8a(iv)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Develop QA procedures for the process parameters used in the correlation developed under Condition 16.8a(ii)(B) **for EU IDs 1, 2, and 3**..	*Recordkeeping* *** These conditions do not include a deadline for completing the QA procedures or a deadline for submitting the procedures with an Operating Report.* *We have not declared "Continuous Compliance" because the required steps have not yet been completed.* ***CPAI intends to submit the QA procedures document to ADEC by June 30, 2019.*** *"Not triggered" does not apply since the requirements to develop and submit QA procedures have been triggered.* *Finally, "Intermittent Compliance" does not apply because there are no deadlines in the conditions for completing the QA procedures or submitting them to ADEC with an Operating Report.*	**		
3	16.8a(v)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Include copies of the QA procedures for the process parameters used in the correlation developed under Condition 16.8a(ii)(B) **for EU IDs 1, 2, and 3** in the Operating Report.		**		
3	16.8a(vi)(A)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If monthly total CO emissions for any of EU IDs 1, 2, or 3 are estimated using a predictive emissions correlation allowed under Condition 16.4d(ii), then after completing a follow-up RM CO source test under Condition 16.8b(i)(A) or Condition 16.8b(i)(E)(3), and after recording the data required under Conditions 16.8b(i)(B)–b(i)(D), comply with Conditions 16.8a(vi)(A)(1) and (2) for that emission unit.	*Recordkeeping*			X
3	16.8a(vi)(B)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If the comparison under Condition 16.8a(vi)(A)(1) shows that the most recent result of any RM CO source test for EU ID 1, 2, or 3 is less than the corresponding predictive emissions correlation result and the calculation under Condition 16.8a(vi)(A)(2) results in predicted emissions that exceed the CO limit in Table D for the same emission unit, then comply with Condition 16.8b(i)(E) for that emission unit.	*Recordkeeping*			X
3	16.8a(vi)(C)	Turbine BACT (CO Predictive Correlation)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If the comparison under Condition 16.8a(vi)(A)(1) shows that the most recent result of any RM CO source test for EU ID 1, 2, or 3 is greater than or equal to the corresponding predictive emissions correlation result, then comply with Conditions 16.8a(vi)(C)(1) and (2) for that emission unit.	*Recordkeeping*			X

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							Continuous	Intermittent	Not Triggered
3	16.8b	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	For any of these emission units, if the Permittee elects to develop load-based CO emission rates using a predictive emissions correlation (as allowed under Condition 16.4d(ii)), the Permittee shall determine the RA of all correlations approved under Condition 16.8a in accordance with Conditions 16.8b(i), (iii), and (v).	*Recordkeeping* *The relative accuracy of the CO predictive emissions correlations used by CPAI for EU IDs 1, 2, and 3 has been determined based on source testing completed in October 2017 for these units.* *The deadline for the follow-up CO relative accuracy source testing has not passed. As such, continuous compliance is declared.*	X		
3	16.8b(i)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 16.8b: (A) Conduct follow-up RM CO stack tests no more than 5 years (more frequently if required by Condition 16.8b(i)(E)) after the previous series of RM tests conducted in accordance with Condition 16.8a(ii). The tests shall be completed using the same Reference Methods specified at Condition 16.8a(ii) at four load settings specified in 40 C.F.R. 60.335(b)(2) on the turbine for which a predictive correlation has been developed and approved (i.e., EU ID 1, 2 or 3). (B) Record each statistically relevant process parameter during each RM stack test no less than once every 15 minutes. Mark the beginning and end of each RM stack test on the output record. (C) Record the CO emission concentrations in lb/hr for each RM stack test period ("RM value"). (D) Determine the integrated average CO emission rate in lb/hr for each RM test period using the best-fit correlations developed and approved under Condition 16.8a ("correlation value").	*Recordkeeping* *The relative accuracy of the CO predictive emissions correlations used by CPAI for EU IDs 1, 2, and 3 has been determined based on source testing completed in October 2017 for these units.* *The deadline for the follow-up CO relative accuracy source testing has not passed. As such, continuous compliance is declared.*	X		
					(E) If triggered under Condition 16.8a(vi): (1) Revise the predictive correlation so that the checks under Conditions 16.8a(vi)(B) and 16.8a(vi)(C) are no longer true; (2) Comply with Condition 16.8a(iii); (3) Conduct follow-up RM CO stack tests and record data as described in Condition 16.8b(i)(A) - (D), but increase the frequency to at least every 12 months. Maintain this frequency for two consecutive years after making the revision to the predictive correlation as required under Condition 16.8b(i)(E)(1) to confirm for two consecutive years that the checks under Conditions 16.8a(vi)(B) and 16.8a(vi)(C) are no longer true. Upon satisfying this requirement, resume RM testing on a five-year schedule under Condition 16.8b(i)(A).	*Recordkeeping*			X

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							Continuous	Intermittent	Not Triggered
3	16.8b(iii)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	If triggered by Condition 16.8a(vi)(C), calculate the relative accuracy of a correlation compared to the RM test as follows: (A) make a direct comparison of the RM value and the correlation value; (B) using the procedures in 40 CFR 60, Appendix B, Section 12 of Performance Specification 2, summarize the results of the comparison in Condition 16.8b(iii)(A) on a data sheet similar to that shown in Section 18 of PS2. Include in the summary the calculated: (1) arithmetic mean of the difference between the "RM value" and the "correlation value", (2) standard deviation, (3) confidence coefficient, and (4) relative accuracy.	*Recordkeeping*			X
3	16.8b(v)	Turbine BACT (CO Predictive Correlation Relative Accuracy Test)	1, 2, 3	N-P MS5382 Turbine (C1) N-P PG5371 Turbine (E1) N-P PGT10+ Turbine (E2)	Attach copies of the results of all RM tests (including any rejected test results) conducted under Condition 16.8b(i) and the final results of the RA test completed under Condition 16.8b(iii), to the Operating Report.	*Recordkeeping/ Operating Reports*			X
3	16.8a	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 16.7g shows that pilot valve movement to the intermediate or full open position exceeds 48 hours in any 12 consecutive month period other than due to exceptions listed (see permit Condition 16.7g), develop a predictive correlation between NOx emission rates from stack tests and turbine process parameters as outlined in Conditions 16.8a(i) - (v).	*Recordkeeping*			X
3	16.8a(i)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 16.7g, notify the Department of intention to develop a predictive correlation for **NOx** emission monitoring, and submit a stack test plan to the Department, that includes: (A) identification of the proposed process parameters for which the Permittee elects to measure a parametric monitoring correlation, and (B) a description of the monitoring methodology accuracy and precision of methodology and sampling rates of each parameter.	*Recordkeeping*			X

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							Continuous	Intermittent	Not Triggered
3	16.8a(ii)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 16.7g, if stack testing has not occurred within 24 months preceding triggering of the predictive correlation method, conduct **NOx** Reference Method (RM) stack tests in accordance with permit Section 6 at four load settings specified in 40 CFR 60.335(b)(2) on either of these emission units. Conduct testing with the pilot valve at minimum, intermediate, and full open position to gather emissions information while operating in and out of low emissions mode. (The results of a stack test conducted in the previous 24 months may be substituted provided the test meets the RM requirements and is approved by the Department.)	*Recordkeeping/ Source Test Reports*			X
3	16.8a(ii)(A)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	During the RM stack tests required under Condition 16.8a(ii) and 16.8b(ii)(A), collect and record the process parameters identified in Condition 16.8a(i)(A) for the purpose of developing or testing parametric correlations for NOx emission rates.	*Recordkeeping/ Source Test Reports*			X
3	16.8a(ii)(B)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Using the RM stack tests results from Condition 16.8a(ii), develop predictive correlations for **NOx** emission rates based on turbine process parameters (the correlation may be based on vendor data as well as RM stack tests).	*Recordkeeping/ Source Test Reports*			X
3	16.8a(iii)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Within 60 days after completing the RM tests required under Condition 16.8a(ii) or revising a predictive correlation as required by Condition 16.8b(iv), submit to the Department for written approval a report that describes the predictive correlation development or revision, including the methodology, assumptions, analysis (with sample calculations), supporting notes, and a list of all process parameters used in the correlations with an analysis of their statistical relevance for the correlation (i.e., an r^2 analysis of curve fit)	*Recordkeeping/ Predictive Correlation Report*			X
3	16.8a(iv)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Develop QA procedures for the process parameters used in the correlation developed under Condition 16.8a(ii)(B) **for EU IDs 4 and 5**.	*Recordkeeping/ Predictive Correlation Report*			X
3	16.8a(v)	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	Include copies of the QA procedures for the process parameters used in the correlation developed **for EU IDs 4 and 5** under Condition 16.8a(ii)(B) in the Operating Report.	*Recordkeeping/ Operating Report*			X

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							Continuous	Intermittent	Not Triggered
3	16.8b	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	For each of these emission units, if recordkeeping required by Condition 16.7g shows that pilot valve movement to the intermediate or full open position exceeds 48 hours in any 12 consecutive month period other than due to exceptions listed (see permit Condition 16.7g), the Permittee shall determine the RA of all correlations approved under Condition 16.8a in accordance with Conditions 16.8b(ii) - (v).	*Recordkeeping/ RA tests*			X
3	16.8b(ii)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 16.8b, then: (A) Conduct follow-up RM NOx stack tests no more than 12 months after the previous series of tests conducted in accordance with Condition 16.8a(ii) or this condition. The tests shall be completed using the same Reference Methods specified at Condition 16.8a(ii) at four load settings specified in 40 C.F.R. 60.335(b)(2) on the turbine for which a predictive correlation has been developed and approved (i.e., EU ID 4 or 5). (B) record each statistically relevant process parameter during each RM stack test no less than once every 15 minutes. Mark the beginning and end of each RM stack test on the output record; (C) record the NOx emission concentrations in ppmv for each RM stack test period ("RM value"); and (D) determine the integrated average NOx concentration in ppmv corrected to 15% O2 for each RM test period using the best fit correlations approved under Condition 16.8a ("correlation value").	*Recordkeeping/ Source Test Reports*			X
3	16.8b(iii)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If triggered by Condition 16.8b, calculate the relative accuracy of a correlation compared to the RM test as follows: (A) make a direct comparison of the RM value and the correlation value; (B) using the procedures in 40 CFR 60, Appendix B, Section 12 of Performance Specification 2, summarize the results of the comparison in Condition 16.8b(iii)(A) on a data sheet similar to that shown in Section 18 of PS2. Include in the summary the calculated: (1) arithmetic mean of the difference between the "RM value" and the "correlation value", (2) standard deviation, (3) confidence coefficient, and (4) relative accuracy.	*Recordkeeping/ RM tests*			X
3	16.8b(iv)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	If RA test results under Condition 16.8b(iii) for the Department approved correlation exceed the values in 40 CFR 60, Appendix B, Section 13.2 of Performance Specification 2, revise the predictive correlation.	*Recordkeeping/ RA tests*			X

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							Continuous	Intermittent	Not Triggered
3	16.8b(v)	Turbine BACT (NOx Predictive Correlation Relative Accuracy Test)	4, 5	Solar Turbines (S1 & S2)	Attach copies of the results of all RM tests (including any rejected test results) conducted under Condition 16.8b(ii) and the final results of the RA test completed under Condition 16.8b(iii), to the Operating Report	*Recordkeeping/ Operating Reports*			X
3	16.8c	Turbine BACT (NOx Predictive Correlation)	4, 5	Solar Turbines (S1 & S2)	After operating with the predictive correlation required by Condition 16.7g for 24 months, the Permittee may discontinue use of the predictive correlation upon showing that pilot valve movement to the intermediate or full open position does not exceed 48 hours in any consecutive 12 month period other than due to a startup, shutdown, subzero turbine intake temperatures, periods of emission testing, load change when these emission units operate in lead (isochronous) mode due to EU ID 2 being out of service, or startup and shutdown of EU ID 2.	*Recordkeeping*			X
3	16.9a	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Except during startup, shutdown, and periods of required emission testing, limit operation of EU IDs 4 and 5 at less than 45 percent load to no greater than 316 combined hours in any 12 consecutive months.	*Recordkeeping*	X		
3	16.9b	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Calculate the 12-month combined rolling total operating time at less than 45 percent load, excluding operating during startup, shutdown, and periods of required emission testing.	*Recordkeeping*	X		
3	16.9c	Turbine BACT (CO BACT Operational Requirements)	4, 5	Solar Turbines (S1 & S2)	Report the 12-month combined rolling total hours calculated in Condition 16.9b in the Operating Report for each month of the reporting period.	*Operating Reports*	X		
3	16.9d	Turbine BACT (CO BACT PD Reporting)	4, 5	Solar Turbines (S1 & S2)	Submit a Permit Deviation report if operation of EU IDs 4 and 5 combined exceeds operation 45 percent load for more than 316 combined hours in any 12 consecutive months.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	17	Heater and Boiler BACT	106-109, 518	Heaters and Boilers	Install low NOx burners on these heaters.	*Vendor specifications*	X		
3	17	Heater and Boiler BACT	106-109, 518, 839	Heaters and Boilers	Implement good operational practices to minimize emissions from these heaters and boilers.	*Recordkeeping / good operational practices.*	X		
3	17	Heater and Boiler BACT Emission Limits	106-109, 518, 839	Heaters and Boilers	Actual emissions from these heaters shall be limited as indicated in Table E of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data, installation of BACT controls, low sulfur fuels, and good operational practices.*	X		

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							Continuous	Intermittent	Not Triggered
3	17.1	Heater and Boiler BACT	106-109, 518, 839	Heaters and Boilers	Maintain records that are available for inspection demonstrating that these units are maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		
3	17.2a(i)	Heater and Boiler BACT (NOx and CO Stack Testing)	106-109, 518	Heaters and Boilers	Conduct NOx and CO source tests for these units while fired on fuel gas, and record and report results in accordance with Section 6 of the permit. Conduct each set of tests within 12 months after the permit effective date and once every five years thereafter. Conduct the tests at the highest typical operating load of the unit. Substituting test data between units operated by CPAI at stationary sources at the Alpine Field is allowed if CPAI documents the intent to substitute testing for multiple heaters and meets all other requirements of Conditions 38.1b(i) through 38.1b(iii) as they would apply to these units and to the limits in Table E of the permit. The source test report shall include NOx and CO emissions in lb/MMBtu for the emission unit tested.	*Recordkeeping/ Source Test Reports*	X		
3	17.2a(ii)	Heater and Boiler BACT (NOx and CO Stack Testing)	108, 109	Thermoflux UHM Heaters	(A) Conduct NOx and CO source tests for either EU ID 108 or 109 while fired on backup liquid fuel in accordance with Section 6 of the permit. (B) Conduct the tests while firing backup liquid fuel within 12 months of operating 400 unit-hours or more in a consecutive 12-month period on liquid fuel, except as allowed under Condition 17.2a(ii)(C). (C) Testing while firing backup liquid fuel is not triggered under Condition 17.2a(ii)(A) if the latest test results on backup liquid fuel were less than or equal to 90 percent of each of the applicable limits in Table E of the permit and it has been less than four years since the latest backup liquid fuel source test on a given unit.	*Recordkeeping/ Source Test Reports* *These heaters did not exceed 400 unit-hours of operation on backup liquid fuel during the certification period.*			X
3	17.2b	Heater and Boiler BACT Limits	106-109, 518	Heaters and Boilers	Monitor, record, and report in accordance with Conditions 15.6 through 15.8 to demonstrate compliance with the short-term BACT SO2 limit for fuel gas in Table E.	*Recordkeeping/ Operating Reports*	X		
			108, 109		Monitor, record, and report in accordance with Conditions 15.2 or 15.3 and 15.5 to demonstrate compliance with the short-term BACT SO2 limit for liquid fuel in Table E.	*Recordkeeping/ Operating Reports*	X		
3	17.2c	Heater and Boiler BACT (Opacity Readings)	106-109, 518	Heaters and Boilers	Conduct annual visible emission observations while operating on fuel gas, the first to be completed within 12 months of the effective date of the permit to demonstrate compliance with the short-term turbine BACT PM (opacity) emission limit in Table E of the permit.	*Recordkeeping/ Method 9*	X		

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							Continuous	Intermittent	Not Triggered
3	17.2c(i), 17.2c(ii)	Heater and Boiler BACT (Opacity Readings)	106-109, 518	Heaters and Boilers	Conduct subsequent visible emission observations, while fired on fuel gas, within 12 months after the preceding observation. If the EU has intermittent operations, subsequent visible emission observations may be completed during the next scheduled operation immediately following the preceding observation.	*Recordkeeping/ Method 9*	X		
3	17.2c(iii)	Heater and Boiler BACT (Opacity MR&R)	106-109, 518	Heaters and Boilers	While fired on fuel gas, record and report visible emissions observation results as required by Conditions 4, 5.1, and 5.2a compared to the 10 percent opacity BACT limit.	*Recordkeeping/ Operating Reports*			X
3	17.2d	Heater and Boiler BACT (Opacity MR&R)	108, 109	Thermoflux UHM Heaters	Indicate in each Operating Report whether this unit fired only gas during the period covered by the report.	*Recordkeeping/ Operating Reports*	X		
					If operation on back-up liquid fuel occurred during the period covered by the report, monitor, record, and report according to Condition 14 to demonstrate compliance with the short-term heater BACT PM (opacity) limit in Table E that applies when this unit is fired on backup liquid fuel.	*Method 9/ Operating Reports* *Monitoring not required.*			X
3	17.3	Heater and Boiler BACT EE Reporting	106-109, 518, 839	Heaters and Boilers	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	18	Diesel Unit BACT	211	Cummins Backup Generator	Operate this unit using direct injection and timing retard. Implement good operational practices to minimize emissions.	*Recordkeeping / good operational practices.*	X		
3	18	Diesel Unit BACT Emission Limits	211	Cummins Backup Generator	Actual emissions from this engine shall be limited as indicated in Table F of Air Quality Operating Permit No. AQ0489TVP02.	*Source test data, installation of BACT controls, low sulfur fuels, and good operational practices.*	X		
3	18.1	Diesel Unit BACT	211	Cummins Backup Generator	Maintain records that are available for inspection demonstrating that this unit is maintained in good operating condition and in accordance with current CPAI-established guidelines and operating procedures.	*Recordkeeping*	X		
3	18.2a(i)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Conduct NOx and CO source tests in accordance with Section 6 of the permit at the highest typical operating load of this unit within 12 months after the effective date of the permit.	*Recordkeeping/ Source Test Reports*	X		
3	18.2a(ii), 18.2a(iii)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Conduct follow-up source tests in accordance with Section 6 of the permit at the highest typical operating load of this unit within 12 months of any operation of 400 hours or more in a consecutive 12-month period, except testing is not required if the latest test results were less than or equal to 90 percent of each of the applicable limits in Table F of the permit and it has been less than four years since the latest source test on this unit.	*Recordkeeping* *No follow-up source testing during the certification period for this emission unit.*			X

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							Continuous	Intermittent	Not Triggered
3	18.2a(iv)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Conduct source tests at the highest typical operating load of this unit.	*Recordkeeping*			X
3	18.2a(v)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	CPAI may substitute test data between engines operated by CPAI at stationary sources on the North Slope of Alaska if CPAI documents the intent to substitute testing for multiple engines and meets all other requirements of Conditions 38.1b(i) through 38.1b(iii) as they would apply to engine and the limits in Table F.	*Recordkeeping* *No substitution of source test data for this emission unit.*			X
3	18.2a(vi)	Diesel Unit BACT (NOx and CO Stack Testing)	211	Cummins Backup Generator	Include in the source test report the NOx and CO emissions in lbs/hr for each load tested.	*Recordkeeping/ Source Test Report* *No source testing conducted during the certification period.*			X
3	18.2b	Diesel Unit BACT (SO2 Limit MR&R)	211	Cummins Backup Generator	Monitor, record, and report in accordance with Conditions 15.2 or 15.3 and 15.5 to demonstrate compliance with the short-term BACT SO2 limit of 0.11% (by weight) sulfur in the liquid fuel.	*Recordkeeping/ Operating Reports*	X		
3	18.3	Diesel Unit BACT EE Reporting	211	Cummins Backup Generator	Submit an Excess Emissions report if the emissions of any pollutant exceed the short-term BACT limits.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	19	Flare BACT Limits	415, 416	Flares	Design, install and operate the flares to be smokeless to meet the requirements of 40 C.F.R. 60.18.	*Recordkeeping/ Equipment design*	X		
3	19.1	Flare BACT Limits	415, 416	Flares	EU IDs 415 and 416 shall be designed for, and operated with, no visible emissions except for periods not to exceed a total of 5 minutes during any two consecutive hours and except for periods of startup, shutdown, or malfunction as defined in 40 C.F.R. 60.2.	*Recordkeeping*	X		
3	19.2	Visible Emissions Monitoring for Flares	415	HP Flare	At least once in every calendar month that each unit operates, momentarily observe their exhaust during normal operation for indications of visible emissions. Keep a log of the observations in accordance with Condition 19.4.	*Recordkeeping*	X		
			416	LP Flare		*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
3	19.3	Visible Emissions Monitoring for Flares	415	HP Flare	If visible emissions are observed at any time during normal flaring operation of each unit and are present continuously for more than two (2) minutes, conduct a visible emission (VE) evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 22. The Method 22 VE observation period shall not be less than 2-hours in duration, sufficient to document a violation of Condition 19. Observation of the flare may be postponed for safety or due to weather reasons.	*Recordkeeping*			X
			416	LP Flare		*Recordkeeping*			X
3	19.3a-19.3d	Visible Emissions Monitoring and Recordkeeping for Flares	415	HP Flare	If visible emissions are noted for a total of more than 5 minutes during the Method 22 VE observation under Condition 19.3: a. Determine whether the flare is being properly operated and maintained; b. Initiate corrective actions, if necessary, to eliminate visible emissions from EU ID 415 within 24 hours of the Method 22 VE observation; c. Keep a written record of the starting date, the completion date, and a description of the actions taken to reduce visible emissions; and d. After completing the corrective actions, conduct a follow-up VE evaluation in accordance with 40 C.F.R. 60 Appendix A, Method 22. The Method 22 VE observation period shall not be less than 2 hours in duration.	*Recordkeeping*			X
			416	LP Flare		*Recordkeeping*			X
3	19.4	Visible Emissions Recordkeeping for Flares	415	HP Flare	For observations of visible emissions per Condition 19.2 and for any Method 22 observations per Condition 19.3, record the the information required by Conditions 19.4a-19.4f in a written log for each observation for each flare.	*Recordkeeping*	X		
			416	LP Flare		*Recordkeeping*	X		
3	19.5a	Visible Emissions PD Reporting for Flares	415, 416	Flares	Submit a Permit Deviation report for failure to conduct monitoring or recordkeeping per Conditions 19.2 through 19.4.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	19.5b	Visible Emissions EE Reporting for Flares	415, 416	Flares	Submit an Excess Emissions report when the flare exhaust is visible for more than a total of five (5) minutes during any two (2) consecutive hours, except if the emissions are observed during startup, shutdown or malfunction.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	19.5c	Visible Emissions EE/PD Reporting for Flares	415, 416	Flares	Include in the Excess Emission or Permit Deviation report required by Conditions 19.5a or 19.5b copies of the records required by Conditions 19.4a through 19.4f.	*Recordkeeping/ Excess Emissions and Permit Deviation Reports*			X
3	19.6	Visible Emissions Reporting for Flares	415, 416	Flares	Submit with the Operating Report for the period covered by the report: a. Copies of records required under Conditions 19.3c and 19.4; and b. The dates that informal VE observations per Condition 19.2 were made, and the dates, if any, that a Method 22 VE per Condition 19.3 was observed.	*Operating Reports*	X		
3	20	Liquid Fuel Sulfur Content Limit	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	Do not use liquid fuel with a sulfur content that exceeds 0.11% by weight.	*Recordkeeping/ Operating Reports*	X		
3	20.1	Liquid Fuel Sulfur Content MR&R	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	To demonstrate compliance with the fuel oil sulfur content limit in Condition 20, monitor, record and report according to Condition 15.2 or 15.3 and 15.5.	*Recordkeeping/ Operating Reports*	X		
3	20.2	Liquid Fuel Sulfur Content EE Reporting	4, 108, 109, 211, 212, 621, 742, 743, 839	Liquid Fuel-Fired Equipment	Submit an Excess Emissions report if the fuel oil sulfur content exceeds 0.11 percent by weight.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
3	21	Fuel Gas H2S Content Limit	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Do not use fuel gas with a hydrogen sulfide (H_2S) concentration that exceeds 200 ppmv at standard conditions.	*Recordkeeping/ Operating Reports*	X		
3	21.1	Fuel Gas H2S Content Limit (MR&R)	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	To demonstrate compliance with the fuel gas H2S content limit in Condition 21, monitor, record and report according to Conditions 15.6 through 15.8.	*Recordkeeping/ Operating Reports*	X		
3	21.2	Fuel Gas H2S Content Limit EE Reporting	1-5, 106-110, 415-417, 518-520	Fuel Gas Burning Equipment	Submit an Excess Emissions report if the fuel gas H2S content exceeds 200 ppmv at standard conditions.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	22	Operating Limits	4, 108, 109, 211, 212, 313, 314, 417, 742, 743	Fuel-Fired Equipment	Operation of these emission units shall be limited to the restrictions of Table G of Air Quality Operating Permit No. AQ0489TVP02.	*Recordkeeping*	X		
3	22.1	Operating Limits	2, 3, 5	Turbines	Do not burn liquid fuel in these turbines.	*Recordkeeping*	X		
3	22.2a	Operating Limits EE/PD Reporting	4, 108, 109, 211, 212, 313, 314, 417, 742, 743	Fuel-Fired Equipment	Submit an Excess Emission or Permit Deviation report if any any operating limit in Table G of the permit is exceeded.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	22.2b	Operating Limits EE/PD Reporting	2, 3, 5	Turbines	Submit an Excess Emission or Permit Deviation report if any of these turbines operate on liquid fuel.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	22.2c	Operating Limits PD Reporting	743	Well Frac Unit(s)	Submit a Permit Deviation report if this unit operates with use of a combustion turbine driver.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	23, 23.1, 23.6, 25.1	Hours of Operation Monitoring	1-5, 106-110, 211, 212, 313, 314, 415, 416, 518-520, 621, 622, 839	Fuel-Fired Equipment	Monitor and record the monthly total operating time (all fuel types) for each emission unit, and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	23, 23.2, 23.6	Hours of Operation Monitoring	4, 5	Dual-Fired Turbines	Monitor and record the rolling 12-month total hours of operation during which each emission unit was fired on lean fuel gas, and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	23, 23.3, 23.6	Hours of Operation Monitoring	4, 108, 109	Dual-Fired Equipment	Monitor and record the rolling 12-month total hours of operation during which each emission unit was fired on liquid fuel, and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	23, 23.4, 23.6, 25.1	Hours of Operation Monitoring	211, 212, 313, 314, 621	Fuel-Fired Equipment & Incinerators	Monitor and record the rolling 12-month total hours of operation for each emission unit and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		
3	23, 23.5, 23.6, 25.1	Hours of Operation Monitoring	211, 212, 621, 622	Fuel-Fired Engines	Monitor and record the calendar year total hours of operation for each emission unit and report in the Operating Report for each month of the reporting period.	*Recordkeeping/ Operating Reports*	X		

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							Continuous	Intermittent	Not Triggered
3	23.7	Operating Limits PD Reporting	4, 108, 109, 211, 212, 313, 314, 743	Fuel-Fired Equipment	Submit a Permit Deviation report if any monitoring, recordkeeping, or reporting required under Condition 23 is not completed.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
3	24	Fuel Consumption Monitoring	1-5, 106-110, 211, 212, 313, 314, 415-417, 518-520, 621, 622, 742, 743, 839	Fuel-Fired Equipment	Monitor and record fuel consumption and operations, as necessary to report the information required by Conditions 24.1 through 24.6, as applicable to each unit. Fuel use may be estimated by measurement techniques and calculations approved by the Department.	*Recordkeeping*	X		
3	24.1a	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac Engines	At a consistent time each day, monitor the daily fuel consumption for all well servicing equipment and well fracking IC engines in accordance with operating procedures or industry standard fuel tracking practices.	*Recordkeeping*	X		
3	24.1a(i)	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac Engines	Upon request by the Department, provide records to demonstrate how the fuel consumption has been tracked/ estimated. These records may include but are not limited to: recorded data from fuel tracking devices or procedures, calculations used to estimate fuel consumption based on operating time, review of fuel tracking standards, and/or inspection of the fueling operation and volume tracking.	*Recordkeeping*			X
3	24.1b	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac Engines	Record the cumulative daily fuel consumption at each individual well pad location (CD-1, CD-2, CD-3, and CD-4).	*Recordkeeping*	X		
3	24.2	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac Engines	Using the records obtained under Condition 24.1b, calculate and record the following for all well servicing equipment and well fracking IC engines: a. The cumulative total fuel consumed each day while operating at CD-1 or CD-2; b. The highest daily cumulative total fuel consumed during the previous calendar month while operating at CD-1 or CD-2; c. The cumulative total fuel consumed for the previous calendar month while operating at CD-1, CD-2, CD-3, or CD-4; d. The cumulative total fuel consumed for the previous 12 consecutive month period while operating at CD-1, CD-2, CD-3, or CD-4.	*Recordkeeping*	X		

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Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
3	24.3	Fuel Consumption Reporting	1-5, 106-110, 211, 212, 313, 314, 415-417, 518-520, 621, 622, 742, 743, 839	Fuel-Fired Equipment	Include in the Operating Report the monthly total fuel consumption for each type of fuel (MMscf/month and/or gallons/month) for each unit, for each month of the reporting period.	*Operating Reports*	X		
3	24.4	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac	Include in the Operating Report the maximum daily combined total fuel consumption (gallons) for EU IDs 742 and 743 at CD-1 and CD-2, combined, and all daily total fuel consumption values in excess of the daily limit found in Condition 22, if applicable, for each month of the reporting period.	*Operating Reports*	X		
3	24.5	Fuel Consumption Reporting	742, 743	Well Servicing and Well Frac	Include in the Operating Report the 12 consecutive month total fuel consumption (gallons) for each of EU IDs 742 and 743 at CD-1, CD-2, CD-3, and CD-4, combined, for each month of the reporting period.	*Operating Reports*	X		
3	24.6a	Operations and Fuel Consumption Monitoring and Recordkeeping	417	Portable Flares	Monitor and keep the following records of portable flare operations at CD-1, CD-2, CD-3 and CD-4: (i) The location, date and time of startup and completion for each portable flare and whether simultaneous portable flare operations occurred on a single pad, and (ii) The quantity of gas combusted during each flaring event, average temperature and pressure, corrected quantity of gas combusted each month (MMscf), and twelve consecutive month total gas burned in all portable flares (MMscf). The fuel use may be estimated by measurement techniques and calculations approved by the Department.	*Recordkeeping/ Operating Reports*	X		
3	24.6b	Operations and Fuel Consumption Reporting	417	Portable Flares	Include in the Operating Report the data recorded in Conditions 24.6a(i) and 24.6a(ii) to illustrate the compliance status with the operating limit tabulated in Condition 22 (Table G) of the permit that applies to EU ID 417 for each month of the reporting period.	*Operating Reports*	X		
3	24.7	Operating Limits EE/PD Reporting	1-5, 106-110, 211, 212, 313, 314, 415-417, 518-520, 621, 622, 742, 743, 839	Fuel-Fired Equipment	Submit an excess emission or permit deviation report if any monitoring, recordkeeping, or reporting required under Condition 24 is not completed.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
3	25	Limits to Avoid PSD	621	CD-3 Caterpillar 3412E Generator	Limit operations of this unit to no greater than 1,500 hours per consecutive 12-month period.	*Recordkeeping*	X		
3	25.2	Limits to Avoid PSD EE/PD Reporting	621	CD-3 Caterpillar 3412E Generator	Submit an Excess Emissions or Permit Deviation report if this unit operates for greater than 1,500 hours in any consecutive 12-month period.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
3	26	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	Limit VOC emissions at CD1, CD2, CD3, and CD4 from this emission unit during well maintenance activities to a combined total no greater than 31 tons per 12-month rolling period.	*Recordkeeping/ Operating Reports*	X		
3	26.1	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	During well maintenance activities and when sending live crude oil to this emission unit, record the following: - date and time that venting began and ended - event description (well name, type of activity, etc.) - description of fluids introduced to the tank(s) - volume of liquid accumulated in the tank(s) - estimated percentage of live crude oil in the total liquid volume accumulated in the tank(s) - estimated volume of gas vented - estimated tonnage of VOC's vented - operational comments and/or assumptions used for estimated volumes reported	*Recordkeeping* *No well maintenance flowbacks during the certification period.*			X
3	26.2	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	During well maintenance activities and when sending live crude to this emission unit, estimate the monthly tonnage of total VOC emissions from this emission unit at CD-1, CD-2, CD-3, and CD-4 using methods outlined in the permit or an alternate method approved by the Department.	*Recordkeeping* *No well maintenance flowbacks during the certification period.*			X
3	26.3	Limits to Avoid PSD	946	Temporary Crude Oil Storage Tank(s)	Include in the Operating Report, the following information for any month when well maintenance has occurred and live crude oil has been sent to EU ID 946: - the monthly and rolling 12-month total estimated VOC emissions at CD-1, CD-2, CD-3, and CD-4 - the input and output from simulation models and software - all calculations and assumptions used.	*Recordkeeping/ Operating Reports* *No well maintenance flowbacks during the certification period.*			X
3	27, 27.1	VE Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Visible emissions (excluding water vapor) must not exceed 20% averaged over any 6 consecutive minutes.	*Reasonable inquiry*	X		
3	27, 27.2	PM Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Particulate Matter emitted must not exceed 0.05 grains/dscf of exhaust averaged over 3 hours.	*Reasonable inquiry*	X		

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							Continuous	Intermittent	Not Triggered
3	27, 27.3	Sulfur Standard: Insignificant Emission Units	IEUs	Insignificant Emission Units	Sulfur compound emissions, expressed as SO2, must not exceed 500 ppm averaged over 3 hours.	*Recordkeeping* *Fuel gas and diesel fuel sulfur monitoring.*	X		
3	27, 27.4a	General MR&R for IEUs	IEUs	Insignificant Emission Units	Annually certify compliance with Condition 26 based on reasonable inquiry.	*Recordkeeping* *Compliance Certification Report* *Reasonable Inquiry*	X		
3	27, 27.4c	Insignificant Emission Units with Actual Emissions > IEU Thresholds	211, 212, 621, 622	Insignificant Emission Units	If any of these emission units has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Recordkeeping* *Hours of operation monitoring* *Operating Report (if applicable)*			X
3	27, 27.4c	Insignificant Emission Units with Actual Emissions > IEU Thresholds	IEUs	Insignificant Emission Units	If any insignificant emission unit has actual emissions greater than the IEU emissions thresholds, include documentation of the emission unit emissions in the Operating Report.	*Reasonable inquiry*			X
3	27, 27.4d	General MR&R for IEUs	IEUs	Insignificant Emission Units	No other MR&R required.	*Advisory Condition*	X		
4	28.1	NSPS Subpart A - Notification Requirements	NA	New NSPS Affected Facility	Notify EPA and the Department of the date any construction or reconstruction of an NSPS-affected facility commences. Notification to be postmarked no later than 30 days after such date.	*Recordkeeping* *No reporting required.*			X
4	28.2	NSPS Subpart A - Notification Requirements	NA	New NSPS Affected Facility	Notify EPA and the Department of the actual date of initial startup of a new NSPS-affected facility within 15 days of startup.	*Recordkeeping* *No reporting required.*			X
4	28.3	NSPS Subpart A - Notification Requirements	NA	NSPS Existing Facility	Notify EPA and the Department 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. Notification to be postmarked 60 days or as soon as practicable before the change is commenced. Notification to include information listed in Condition 28.3a-d.	*Recordkeeping* *No reporting required.*			X
4	28.4	NSPS Subpart A - Notification Requirements	NA	NSPS Existing Facility	Notify EPA and the Department of any proposed replacement of an existing facility. Notification to be postmarked 60 days (or as soon as practicable) before construction is commenced and must include information required in Condition 28.4a-g.	*Recordkeeping* *No reporting required.*			X

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							Continuous	Intermittent	Not Triggered
4	29	NSPS Subpart A - Startup, Shutdown, & Malfunction Requirements	1-5	NSPS Emission Units	Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of these emission units, any malfunctions of associated air pollution control equipment, or any periods during which a continuous monitoring system or monitoring device is inoperative. (While this obligation no longer applies to EU IDs 415, 416, and 945, records established prior to 11/27/2017 for these emission units must be retained for a period of 5 years after this date.)	*Recordkeeping*	X		
4	30	NSPS Subpart A - EEMSP Report	1-5	NSPS Emission Units	Except as provided for in Condition 39.3a(iii), submit to the EPA (copy to the Department) written "excess emissions and monitoring systems performance (EEMSP) reports and/or summary report forms as required by Condition 31 for EU IDs 1-5. Submit the EEMSP reports semiannually, postmarked by the 30th day following the end of each 6-month period. Report excess emissions for all periods of unit operation, including startup, shutdown, and malfunction.	*Recordkeeping* *No Subpart GG EEMSP reports were required or submitted during the certification period.*			X
4	30.1	NSPS Subpart A - EEMSP Report	1-5	NSPS Emission Units	Except as provided for in Condition 31.1, submit the EEMSP reports with the summary report form as required in Condition 31. Written reports of excess emissions shall include the information described in Conditions 30.1a-30.1d.	*Recordkeeping* *No Subpart GG EEMSP reports were required or submitted during the certification period.*			X
4	31	NSPS Subpart A - Summary Report Form	1-5	NSPS Emission Units	Except as provided for in Condition 39.3a(iii), submit to the EPA (copy to the Department) a "summary report form" in the format shown in Figure 1 of 40 C.F.R. 60.7 for each pollutant monitored for EU IDs 1-5. Submit only the summary report form instead of the EEMSP report under Condition 30 if the total duration of excess emissions for the reporting period is less than 1 percent and the CMS downtime is less than 5 percent of the total operating time for the reporting period. Otherwise submit the summary report form along with the EEMSP report described in Condition 30.	*Recordkeeping* *No Subpart GG Summary Reports were required or submitted during the certification period.*			X
4	32	NSPS Subpart A - Performance Tests	NSPS-Affected Units	NSPS Emission Units	Conduct source tests according to the applicable requirements of 40 C.F.R. 60.8 and Section 6 of the permit on any affected facility at such times as may be required by EPA, and provide the Department and EPA with a written report of the results of the source test.	*Source Test Reports* *Condition not triggered.*			X

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							Continuous	Intermittent	Not Triggered
4	33	NSPS/NESHAP Subpart A - Good Air Pollution Control Practice	1-5, 108-110, 313, 314, 519, 520, 944	NSPS/NESHAP emission units	At all times, these emission units, including associated air pollution control equipment, must be maintained and operated in a manner consistent with good air pollution control practice for minimizing emissions.	*Recordkeeping*	X		
4	34	NSPS Subpart A - Credible Evidence	1-5, 108-110, 519, 520	NSPS emission units	Nothing in the permit precludes the use, including the exclusive use, of any credible evidence or information, relevant to whether these emission units would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.	*Advisory Condition*	X		
4	35	NSPS/NESHAP Subpart A - Concealment of Emissions	1-5, 108-110, 313, 314, 519, 520, 622	NSPS/NESHAP emission units	Do not build, erect, install, or use any article, machine, equipment or process, that conceals an emission which would otherwise constitute a violation of a standard set forth in Conditions 36, 38, 39, 40, or 42.	*Recordkeeping*	X		
4	36	NSPS Subpart Dc - Requirements	108, 109	Thermoflux UHM Heaters	Do not combust liquid fuel with a sulfur content greater than 0.5% by weight.	*Recordkeeping/ Operating Reports*	X		
4	36.1a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Record and maintain records of the amounts of each fuel (fuel gas and fuel oil, where applicable) combusted in each unit during each operating day or monitor according to an EPA-approved custom fuel monitoring schedule.	*Recordkeeping*	X		
4	36.1a, 36.1b	NSPS Subpart Dc - Requirements	110, 519, 520	Gas-fired NSPS Subpart Dc Affected Heaters	Record and maintain records of the amount of fuel gas combusted in each unit during each operating day or during each calendar month or monitor according to an EPA-approved custom fuel monitoring schedule.	*Recordkeeping*	X		
4	36.1c	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Obtain from the fuel supplier the results of a fuel oil sulfur analysis in accordance with Condition 15.2 or Condition 15.3a(i) or analyze the sulfur content of the fuel using ASTM D7039-07.	*Recordkeeping*	X		
4	36.2a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Keep records of fuil oil sulfur analyses required by Condition 36.1c.	*Recordkeeping*	X		
4	36.2b	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Keep records documenting a constant supplier or source of fuel oil.	*Recordkeeping*	X		
4	36.3a	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Notify EPA Region 10 of any change in supplier or source of fuel oil. A substantial change in fuel oil quality shall be considered as a change in fuel oil supply.	*Recordkeeping*			X

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							Continuous	Intermittent	Not Triggered
4	36.3b	NSPS Subpart Dc - Requirements	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Semi-annually report to EPA (by the 30th day following the end of the reporting period) the results of all sulfur monitoring, including: (i) calendar dates covered by the report; (ii) for each calendar month during which fuel oil was combusted by either of these emission units: a) monthly average fuel oil sulfur content (weight %), b) reasons for any noncompliance with the fuel oil sulfur standard in Condition 36, and c) any corrective actions taken. (iii) If no fuel oil was combusted during reporting period, the report shall state that no fuel oil was combusted during the period and fuel oil sulfur monitoring was not required.	*Recordkeeping* *No reports required or submitted during the certification period.*			X
4	36.3c	NSPS Subpart Dc - EE Reporting	108, 109	Dual fuel-fired NSPS Subpart Dc Affected Heaters	Submit an Excess Emissions report if the fuel oil sulfur content exceeds 0.5% sulfur by weight.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	37	NSPS Subpart Ka - Requirements	944	ULSD Tank	Do not store in EU ID 944 a petroleum liquid with a true vapor pressure greater than 1.0 psia without first taking measures to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable.	*Recordkeeping*	X		
4	37.1	NSPS Subpart Ka - Requirements	944	ULSD Tank	Annually certify that EU ID 944 stores only Arctic heating fuel, diesel fuel, Jet A fuel, or another liquid with a true vapor pressure of 1.0 psia or less or that measures have been taken to comply with 40 C.F.R. 60.112a, §60.113a, and/or §60.115a, as applicable.	*Recordkeeping* *Annual Compliance Certification Report*	X		
4	38	NSPS Subpart GG - NO_X Standard	1	Injection Turbine (C1)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 172 ppmvd.	*Compliance determined by source test results.*	X		
			2	Generator Turbine (E1)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 168 ppmvd.	*Compliance determined by source test results.*	X		
			3	Generator Turbine (E2)	Do not allow the corrected exhaust gas concentration of NOx from this emission unit to exceed 190 ppmvd.	*Compliance determined by source test results.*	X		
			4, 5	Solar Turbines (S1 & S2)	Do not allow the corrected exhaust gas concentration of NOx from these emission units to exceed 180 ppmvd. Note: EU ID 4 is exempt from this standard when firing on liquid fuel in accordance with 40 CFR 60.332(k).	*Compliance determined by source test results.*	X		
4	38.1a	NOx MR&R PERIODIC TESTING	1-5	Turbines	When any of these emission units operate 400 hours or more in any consecutive 12-month period during the life of the permit, then Condition 38.1a(i) or 38.1a(ii) must be satisfied for that unit.	*Source tests/ recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	38.1a(i)	NOx MR&R PERIODIC TESTING	1-5	Turbines	For an existing turbine whose latest emissions source testing was certified as operating at less than or equal to 90 percent of the most stringent applicable limit shown in Conditions 15 and 40, conduct subsequent source tests using approved reference methods by the schedule below: (A) Within 1 year of the effective date of the permit if the most recent source test or substitute source test for the affected unit occurred greater than four years prior to the effective date of the permit and the turbine operated 400 hours or more in any consecutive 12-month period ending during any of the 6 months that precede the permit effective date, or (B) Within 1 year after a trigger event (operating 400 hours or more in any 12-month period) if the last source test occurred greater than four years prior to the trigger event.	*Source tests/ recordkeeping*	X		
4	38.2a(ii)	NOx MR&R PERIODIC TESTING	1-5	Turbines	For an existing turbine whose latest emissions source testing was certified as operating at greater than 90 percent of any of the applicable limits shown in Conditions 16 and/or 38, conduct subsequent source tests using approved reference methods, annually until two consecutive tests show performance results certified at less than or equal to 90 percent of the most stringent of applicable limits of Conditions 16 and 38.	*Source test data* *All test results 90 percent or less of the applicable limits.*			X
4	38.1b	NOx MR&R SUBSTITUTING TEST DATA	1-5	Turbines	CPAI may use a source test on only one of the turbines to satisfy the testing requirement if the test is representative of the group and the results are less than 90% of the limit, as described in Condition 38.1b.	*Source test data - substituion of test data has not been done at Alpine.*			X
4	38.1c(i)	NOx MR&R LOAD	1-5	Turbines	Tests shall be conducted in accordance with 40 CFR 60.335(b)(2) or other approved method. Testing shall occur when turbine is operating at the highest load achievable by the turbine under ambient and stationary source operating conditions in effect at the time of the test.	*Source test data* *No source tests conducted during the certification period.*			X
4	38.1c(ii)	NOx MR&R LOAD	1-5	Turbines	Demonstrate in the source test plan whether the test is scheduled when maximum NOx emissions are expected.	*Source test data* *No source tests conducted during the certification period.*			X
4	38.1c(iii)	NOx MR&R LOAD	1-5	Turbines	If the highest operating rate tested is less than the maximum load of the tested turbine or another turbine represented by the test data, comply with Conditions 38.1c(iii)(A) - (D).	*Source test data* *No source tests conducted during the certification period.*			X
4	38.1c(iv) 38.1c(v)	NOx MR&R LOAD	1-5	Turbines	In order to perform emission source tests, CPAI may operate a turbine at a higher load than that prescribed by Condition 38.1c(iii). For the purposes of Conditions 38.1 through 38.3, maximum load means the hourly average load that is the smallest of the loads defined in Conditions 38.1c(v)(A) - (C).	*Advisory Conditions*	X		

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4	38.2a	NOx MR&R RECORD KEEPING	1-5	Turbines	If the test is conducted at less than maximum load and the test does not show compliance with the limit at maximum load, CPAI shall keep hourly records of load, surrogate measurements for load and method for calculating load from the measurements. Within one month of demonstrating highest load under Condition 38.1c(iii)(A), submit to the Department how load or load surrogates will be measured and a schedule for necessary equipment installation and monitoring.	*Source test data*			X
4	38.2b	NOx MR&R RECORD KEEPING	1-5	Turbines	For turbines that operate less than 400 hours in any 12 consecutive months, keep monthly records of the hours of operation.	*Recordkeeping/ Operating Reports*			X
4	38.3a	NOx MR&R REPORTING	1-5	Turbines	List in the Operating Report each turbine tested or represented by testing at less than maximum load and for which the load must be limited. Include: load limit, turbine identification, highest load recorded during the period covered by the Operating Report.	*Recordkeeping* *Reporting not required during certification period.*			X
4	38.3b	NOx MR&R REPORTING	1-5	Turbines	For turbines that have not been tested because they normally operate less than 400 hours in any 12 consecutive months, identify in the Operating Report: the turbine, highest number of operating hours for any 12 consecutive months ending during the period covered by the report, and any turbine that operated 400 or more hours.	*Recordkeeping/ Operating Reports*			X
4	38.3c	NOx MR&R EE/PD REPORTING	1-5	Turbines	Submit an excess emission or permit devation report if: a test result exceeds the emission standard, source testing is required by Condition 38.1a but not performed, or the turbine was operated at a load exceeding that allowed by loads which would cause an exceedence of emission limits in Conditions 16 or 38.	*Recordkeeping/source test data* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
4	39	NSPS Subpart GG - SO2 Standard	1-5	Turbines	Do not allow the sulfur content of the fuel gas burned in these emission units to exceed 0.8 percent by weight.	*Recordkeeping* *Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		
			4	Solar Turbine (S1)	Do not allow the sulfur content of the liquid fuel burned in this emission unit to exceed 0.8 percent by weight.	*Recordkeeping*	X		

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4	39.1a	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Demonstrate compliance with Condition 41 (NSPS SO2 Standard) by either: - demonstrating that the gaseous fuels fired in these emission units meet the definition of natural gas found in 40 CFR 60.331(u), or - monitoring the total sulfur content of the gaseous fuels burned in these emission units using the total sulfur methods described in Condition 39.1e(ii). Alternatively, if the total sulfur content of the gaseous fuels during the most recent performance test was less than 4000 ppmw, methods ASTM D4084-82, 94, D5504-01, D6228-98, or GPA Standard 2377-86 may be used to measure the major sulfur compounds, or - monitoring according to the custom fuel monitoring schedule and plan as allowed under Condtion 39.1c.	*Recordkeeping/ Operating Reports* *Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		
			4	Dual fuel-fired Solar Taurus (S1)	Demonstrate compliance with Condition 39 (NSPS SO2 Standard) by either: - monitoring the total sulfur content of the liquid fuel burned in this unit using the total sulfur methods described in Condition 39.1e(i), or - monitoring according to the custom fuel monitoring schedule and plan as allowed under Condtion 39.1c.	*Recordkeeping/ Operating Reports* *Method - ASTM 7039-07, which is appropriate for ULSD fuel sulfur monitoring.*	X		
4	39.1b	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Use an approved method when making the optional demonstration that the fuel gas fired by these emission units (rich and lean fuel gas, as applicable) meets the definition of natural gas.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*	X		
4	39.1c	NSPS Subpart GG SO2 Monitoring	1-3	Turbines	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. The EPA-approved Custom Fuel Monitoring Schedule and Alternate H2S Sampling Method established for EU IDs 1 through 3 allow the Permittee to determine the sulfur content of the fuel at least semi-annually using ASTM-D 4810-88, D 4913-89, or Gas Producers Association 2377-86.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X

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							Continuous	Intermittent	Not Triggered
4	39.1d	NSPS Subpart GG SO2 MR&R	4	Dual fuel-fired Solar Taurus (S1)	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 Permittee may, without submitting a special petition to EPA, continue monitoring on that schedule. A Custom Fuel Monitoring Schedule for EU ID 4 liquid fuel sulfur monitoring has been approved by EPA. The requirements are found in Conditions 39.1d(i) - (iv).	*Monitoring, recordkeeping, and reporting according to the requirements of the Custom Fuel Monitoring Plan as outlined in Conditions 39.1d(i) - (iv).*	X		
4	39.1d(i)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	Determine the amount of fuel oil combusted daily by this unit.	*Recordkeeping/ Operating Reports*	X		
4	39.1d(ii)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	For each calendar month during which this unit is fired on liquid fuel, obtain from the fuel supplier the results of a fuel oil sulfur analysis conducted in accordance with the test methods referenced in 40 C.F.R. 60.335(b)(10)(i) [see Condition 39.1f(i)] or ASTM D7039-07.	*Recordkeeping/ Operating Reports*	X		
4	39.1d(iii)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Recordkeeping	4	Dual fuel-fired Solar Taurus (S1)	Maintain a record documenting a constant supplier or source of fuel.	*Recordkeeping*	X		
4	39.1d(iv)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Reporting	4	Dual fuel-fired Solar Taurus (S1)	Notify EPA Region 10 of any change in supplier or source of fuel. A substantial change in fuel quality shall be considered as a change in fuel supply.	*Recordkeeping/ EPA Notifications*			X

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							Continuous	Intermittent	Not Triggered
4	39.1e(i)(A), 39.1e(i)(B)	NSPS Subpart GG SO2 Liquid Fuel Sulfur Monitoring	4	Dual fuel-fired Solar Taurus (S1)	(A) 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 Part 75 of the C.F.R (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). If an emission allowance is being claimed for fuel-bound nitrogen, the nitrogen content of the oil shall be determined and recorded once per unit operating day; or (B) Monitor in accordance with a Custom Fuel Monitoring Schedule and/or Plan approved by the Administrator (e.g. the EPA approved Custom FUel Monitoring Schedule under Condition 39.1d).	*CPAI monitors the sulfur content of the liquid fuel according to a Custom Fuel Monitoring Schedule as allowed under Condition 39.1e(i)(B). The applicable liquid fuel sulfur monitoring for EU ID 4 is provided in Conditions 39.1d(i) - (iv).*	X		
4	39.1e(ii)(A)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	If CPAI elects not to demonstrate sulfur content using options in Condition 39.1b or 39.1c, and for which the fuel is supplied without intermediate bulk storage, the sulfur content value of the gaseous fuel shall be determined under Condition 39.1a and recorded once per unit operating day.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	39.1e(ii)(B)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Notwithstanding the requirements of Condition 39.1d(ii)(A), the Permittee may develop a custom schedule 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, according to the provisions and as allowed under 40 C.F.R. 60.334(i)(3). The two custom sulfur monitoring schedules set forth in 40 C.F.R 60.334(i)(3)(i)(A) through (D) and 60.334(i)(3)(ii) are acceptable without prior EPA approval.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	39.1f(i)	NSPS Subpart GG SO2 Monitoring	4	Dual fuel-fired Solar Taurus (S1)	Analyze a minimum of three fuel samples during each performance test. Analyze the samples for the total sulfur content of the liquid fuel using ASTM D129-00; D2622-98; D4294-02; D1266-98; D5433-00; or D1552-01.	*Recordkeeping* *Liquid fuel sulfur monitoring is conducted in accordance with Condition 39.1d(i)(C) using ASTM D7039-07, which is appropriate for ULSD fuel..*	X		
4	39.1f(ii)	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	Analyze fuel gas using ASTM D1072-80, 90 (reapproved 1994); D3246-81, 92, 96; D4468-85 (reapproved 2000); or D6667-01. 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 EPA.	*Per EPA letter dated June 30, 2005, Alpine gaseous fuel meets the definition of natural gas.*			X
4	39.1g	NSPS Subpart GG SO2 Monitoring	1-5	Turbines	The fuel sulfur analysis 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.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	39.2, 39.3b	NSPS Subpart GG SO2 Recordkeeping and Reporting	1-5	Turbines	Keep records of fuel gas and liquid fuel sulfur analyses as required by Condition 39.1. Keep records for at least five years after the date of collection. Include a copy of the records of the liquid fuel sulfur analyses, as required by Condition 39.2, with the Operating Report for the period covered by the report.	*Recordkeeping/ Operating Reports*	X		
4	39.3a	NSPS Subpart GG SO2 Reporting	1-5	Turbines	For each affected unit for which CPAI periodically determines the fuel sulfur content under Condition 39.1a, 39.1c, or 39.1d: (i) semi-annually report the results of all sulfur monitoring to EPA and send a copy to the Department by the 30th day following the end of each 6-month period, except as otherwise approved by a custom fuel monitoring schedule; (ii) include with the report submitted under Condition 41.3a(i) a report of excess emissions and monitoring system downtime in accordance with 40 C.F.R. 60.7(c) as summarized in Condition 29 and as defined under 40 C.F.R. 60.334(j)(2). Excess emissions shall be reported for all periods of unit operation, including startup, shutdown, and malfunction. (iii) If periodic fuel gas sulfur monitoring is not required because the demonstration under Condition 39.1b has been made, fuel gas sulfur reporting under Conditions 30, 31, and this condition is not required.	*Subpart GG EEMSP Reports* *No Subpart GG EEMSP reports were required or submitted during the certification period.*			X
4	39.3c	NSPS Subpart GG EE/PD Reporting	1-5	Turbines	Submit an Excess Emissions or Permit Deviation report if the fuel gas or fuel oil sulfur content exceeds 0.8% sulfur by weight, or if monitoring is required under Condition 39.1 but is not conducted, or any reporting required under Condition 39.3 is not completed.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
4	40, 40.1	NSPS Subpart IIII Requirements	622	CD-3 Caterpillar C27 Generator	Purchase an engine certified by the engine manufacturer to meet the new nonroad exhaust emission standards in Table 7 of 40 C.F.R. 1039.102 (EPA Tier 4-interim). The engine must be installed and configured according to the manufacturer's emission-related specifications or demonstrate compliance as outlined in 40 C.F.R. 60.4211(g)	*Recordkeeping*	X		
4	40, 40.2	NSPS Subpart IIII Requirements	622	CD-3 Caterpillar C27 Generator	Operate and maintain the stationary CI ICE and control device (if applicable) according to the manufacturer's emission-related written instructions over the entire life of the engine. In addition, CPAI may change only those settings that are permitted by the manufacturer.	*Recordkeeping*	X		
4	40, 40.3	NSPS Subpart IIII Recordkeeping	622	CD-3 Caterpillar C27 Generator	Maintain records of the manufacturer's certification that the engine meets the emission standards referenced in Condition 40.1.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	40, 40.4	NSPS Subpart IIII EE/PD Reporting	622	CD-3 Caterpillar C27 Generator	Submit an Excess Emissions or Permit Deviation report if any of the requirements in Condition 40 are not met.	*Recordkeeping* *No excess emissions or permit deviation reporting required for this condition during the certification period.*			X
4	41	NESHAP Subpart A Prohibited Activities	313, 314	Incinerators	Do not operate the incinerators in violation of Condition 42, except under an exemption granted by the President.	*Recordkeeping*	X		
4	42	NESHAP Subpart E	313, 314	Incinerators	Mercury emissions from sludge incineration plants (incinerators) combined shall not exceed 3.2 kg per 24-hr period. Annually certify compliance with this limit.	*Recordkeeping/ Annual Compliance Certification Report*	X		
4	43, 43.1	NESHAP Subpart A General Provisions	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A in Table 2 to Subpart HH.	*Recordkeeping*	X		
4	43, 43.2	NESHAP Subpart A General Provisions	211, 212, 621	Liquid Fuel-Fired Engines	Comply with the applicable requirements of 40 C.F.R. 63, Subpart A in accordance with the provisions for applicability of Subpart A in Table 8 to Subpart ZZZZ.	*Recordkeeping*	X		
4	43, 43.3	NESHAP Subpart A General Provisions	947	Gasoline Dispensing Facility (4 Storage Tanks)	Comply with the applicable requirements of 40 C.F.R. 63 Subpart A in accordance with the provisions for applicability of Subpart A described in Table 3 to Subpart CCCCCC.	*Recordkeeping*	X		
4	44	NESHAP Subpart HH Requirements	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Meet the requirements of 40 C.F.R. 63 Subpart HH by complying with the applicable requirements of Condition 51 and report as required by Condition 44.1.	*Recordkeeping*	X		
4	44.1	NESHAP Subpart HH Requirements	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Whenever a process change is made, submit a report to EPA Region 10 within 180 days after the change. The report shall include: a. A brief description of the process change; and b. A description of any modification to standard procedures or quality assurance procedures. [Note: A process change in this context is a change that could result in EU ID 842 no longer qualifying for the exemption under 40 CFR 63.764(e)(1)(ii) due to a potential increase in actual annual benzene emissions.]	*Recordkeeping/ EPA Notifications*			X

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							Continuous	Intermittent	Not Triggered
4	45	NESHAP Subpart ZZZZ Requirements	622	CD-3 Caterpillar C27 Generator	Comply with 40 C.F.R. 63 Subpart ZZZZ by meeting the applicable requirements of 40 C.F.R. 60 Subpart IIII as outlined in Condition 40.	*Compliance with NSPS Subpart IIII*	X		
4	46.1	NESHAP Subpart ZZZZ Operation and Maintenance	211, 212, 621	Diesel-Fired Engines	At all times operate and maintain these units, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Comply with either: a. the manufacturer's emission-related written operation and maintenance instructions; or 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.	*Recordkeeping* *CPAI complies with Condition 46.1a.*	X		
4	46.2	NESHAP Subpart ZZZZ Startup and Idle Time	211, 212, 621	Diesel-Fired Engines	Minimize the time spent at idle during startup and minimize the startup time to a period needed for appropriate and safe loading, not to exceed 30 minutes.	*Recordkeeping*	X		
4	46.3a	NESHAP Subpart ZZZZ Emissions Management Practices	211, 621	Diesel-Fired Engines	(i) Change oil and filter every 1,000 hours of operation or annually, whichever comes first. [ConocoPhillips has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) to extend the specified oil change requirement.] (ii) Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary. (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	*Recordkeeping*	X		
4	46.3b	NESHAP Subpart ZZZZ Emissions Management Practices	212	Detroit Black Start Generator (S4)	(i) Change oil and filter every 500 hours of operation or annually, whichever comes first. [ConocoPhillips has the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) to extend the specified oil change requirement.] (ii) Inspect air cleaner every 1000 hours of operation or annually, whichever comes first, and replace as necessary. (iii) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
4	46.4a	NESHAP Subpart ZZZZ Recordkeeping	211, 212, 621	Diesel-Fired Engines	Keep records of maintenance to demonstrate that the engines and after-treatment control device (if any) are operated and maintained according to the Permittee's own maintenance plan, if maintenance is performed as allowed under Condition 46.1b. These records must include, at a minimum: oil and filter change dates and corresponding hour on the hour meter; inspection and replacement dates for air cleaners, hoses, and belts; and records of other emission-related repairs and maintenance performed.	*Recordkeeping* *The compliance method under Condition 46.1a is used (not Condition 46.1b)*			X
4	46.4b	NESHAP Subpart ZZZZ Recordkeeping	211, 212, 621	Diesel-Fired Engines	Keep records in a form suitable and readily available for expeditious inspection and review, readily accessible in hard copy or electronic form, for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record pertaining to 40 C.F.R. Part 63 applicable requirements. All records may be retained off site.	*Recordkeeping*	X		
4	46.5a	NESHAP Subpart ZZZZ Reporting	211, 212, 621	Diesel-Fired Engines	Include in the Operating Report a report of Subpart ZZZZ deviations as defined in 40 C.F.R. 63.6675 and of each instance in which an applicable requirement in 40 C.F.R. 63, Subpart A (Table 8 of Subpart ZZZZ) was not met.	*Operating Reports* *No Subpart ZZZZ deviation reporting required during the certification period.*			X
4	46.5b	NESHAP Subpart ZZZZ PD Reporting	211, 212, 621	Diesel-Fired Engines	Submit a Permit Deviation report if any deviation from the requirements in Conditions 46.1 through 46.5 occurred.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
4	47, 47.1	NESHAP Subpart CCCCCC General O&M Requirements	947	Gasoline Dispensing Facility	At all times, operate and maintain EU ID 947, 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 EU ID 947.	*Recordkeeping*	X		
4	47.2	NESHAP Subpart CCCCCC Emissions Management Practices	947	Gasoline Dispensing Facility	Do not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: a. Minimize gasoline spills; b. Clean up spills as expeditiously as practicable; c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; and d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.	*Reasonable inquiry*	X		

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							Continuous	Intermittent	Not Triggered
4	47.3	NESHAP Subpart CCCCCC Recordkeeping	947	Gasoline Dispensing Facility	a. Keep records documenting the monthly total gasoline throughput of all tanks that make up EU ID 947 beginning January 10, 2008. Provide these records within 24 hours of a request from the Administrator for such records. b. Keep records in a form suitable and readily available for expeditious inspection and review, readily accessible in hard copy or electronic form, for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record pertaining to 40 C.F.R. Part 63 applicable requirements. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site.	*Recordkeeping*	X		
4	47.4	NESHAP Subpart CCCCCC PD Reporting	947	Gasoline Dispensing Facility	Submit a Permit Deviation report if any deviation from the requirements in Conditions 47.1 through 43.3 occurred.	*Recordkeeping* *No permit deviation reporting required for this condition during the certification period.*			X
4	48, 48.1	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Do not burn more than 10% sewage sludge on a dry basis in each incinerator. Maintain records of the estimated dry percent sewage sludge charging rate for each batch incinerated.	*Recordkeeping*	X		
4	48.2, 48.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Estimate the relative weight of dry sewage sludge and the weight of all fuels and wastes combusted in each incinerator. Maintain records of the estimated weight of dry sewage sludge and the weight of all fuels and wastes incinerated in this unit.	*Recordkeeping*	X		
4	48.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Quarterly calculate the percentage of dry sewage sludge incinerated in each unit. Report in the Operating Report the calculated percentage of dry sewage sludge combusted for the period covered by the report.	*Operating Reports*	X		
4	48.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O	313, 314	Incinerators	Upon request, submit the estimated relative weight of dry sewage sludge and all fuels and wastes incinerated in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested the estimated relative weight of dry sewage sludge and all fuel/ waste during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
4	48.6	Owner Requested Limit - Exemption from 40 CFR 60 Subpart O EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if either incinerator burns more than 10% sewage sludge on a dry basis.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	49	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Do not combust a fuel feed stream which is greater than 10% (in aggregate) of hospital waste and medical/infectious waste in this incinerator, as measured on a calendar quarter basis.	*Recordkeeping*	X		
4	49.1, 49.2	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Estimate the relative weight of the hospital/medical/infectious waste combusted in each incinerator. Keep these records on a calendar quarter basis.	*Recordkeeping*	X		
4	49.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Quarterly calculate the percentage of hospital/medical/infectious waste incinerated in each unit. Report in the Operating Report the calculated percentage of hospital/medical/infectious waste combusted for the period covered by the report.	*Operating Reports*	X		
4	49.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec	313, 314	Incinerators	Upon request, submit the estimated relative weight of the hospital/medical/infectious waste combusted in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested estimated relative weight of the HMI waste information during the certification period.*			X
4	49.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart Ec EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if the estimated weight of the hospital/medical/infectious waste combusted in each incinerator is more than 10% in any calendar quarter.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X

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							Continuous	Intermittent	Not Triggered
4	50	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Burn greater than 30% municipal solid waste or refuse-derived fuel as a percentage of all fuels and wastes burned in each incinerator.	*Recordkeeping*	X		
4	50.1, 50.2	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Estimate the relative weight of municipal solid waste or refuse-derived fuel, and the weight of all other fuels and wastes combusted in each incinerator. Keep these records on a calendar quarter basis and maintain the records for a period of at least 5 years.	*Recordkeeping*	X		
4	50.3	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Quarterly calculate the percentage of municipal solid waste or refuse-derived fuel incinerated in each unit. Report in the Operating Report the calculated percentage of municipal solid waste or refuse-derived fuel combusted for the period covered by the report.	*Operating Reports*	X		
4	50.4	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III	313, 314	Incinerators	Upon request, submit the estimated relative weight of the municipal solid waste or refuse-derived fuel combusted in each incinerator to EPA or the Department.	*Recordkeeping* *Neither ADEC nor EPA requested estimated relative weight of the municipal solid waste or refuse-derived fuel information during the certification period*			X
4	50.5	Owner Requested Limit - Exemption from 40 CFR 60 Subpart III EE Reporting	313, 314	Incinerators	Submit an Excess Emissions report if the estimated weight of the municipal solid waste or refuse-derived fuel combusted in each incinerator is less than or equal to 30%.	*Recordkeeping* *No excess emissions reporting required for this condition during the certification period.*			X
4	51, 51.1	Glycol Dehydration Unit	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Connect the process vent from the glycol dehydration unit to a process natural gas line. Maintain records demonstrating that the process vent tie-in from the glycol dehydration unit is constructed to vent only into a process natural gas line available to the Department for review.	*Recordkeeping*	X		
4	51.2	Glycol Dehydration Unit	842	Glycol Dehydration Unit Process Vent Gas Separator Outlet	Notify the Department in advance of each glycol dehydration unit process vent configuration change.	*Recordkeeping* *No notification required*			X

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							Continuous	Intermittent	Not Triggered
4	52	Asbestos NESHAP	All	NA	When conducting any demolition involving asbestos materials, pre-notify EPA 10 working days in advance.	*Recordkeeping* *Notification not required during the certification period.*			X
4	52	Asbestos NESHAP	All	NA	Develop and implement work practices and engineering controls to conduct demolition, renovation and manage waste.	*Recordkeeping*	X		
4	52	Asbestos NESHAP	All	NA	Keep records in accordance with 40 CFR 61.145 and 61.150.	*Recordkeeping*	X		
4	52	Asbestos NESHAP	All	NA	Comply with applicable notifications in accordance with 40 CFR 61 Subpart A and Appendix A.	*Recordkeeping* *Notification not required during the certification period.*			X
4	53, 53.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.154: No person maintaining, servicing, repairing, or disposing of appliances may knowingly vent or otherwise release any class I or II substance used as refrigerant.	*Recordkeeping* *Contractor certification and training.*	X		
4	53, 53.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.156: All refrigerant must be evacuated to a recovery or recycling machine prior to any person maintaining, servicing or repairing appliances.	*Recordkeeping* *Contractor certification and training.*	X		
4	53, 53.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.161: Technicians who maintain, service or repair appliances must be certified by an approved technician certification program.	*Recordkeeping* *Contractor certification and training.*	X		
4	53, 53.1	Refrigerant Recycling and Disposal	All	NA	Comply with 40 CFR 82.162: All persons maintaining, servicing, or repairing appliances must certify to Administrator that they have acquired certified recovery or recycling equipment.	*Recordkeeping* *Contractor certification and training.*	X		
4	53, 53.1	Refrigerant Recycling and Disposal	All	NA	Comply with applicable reporting and recordkeeping requirements of 40 CFR 82.166.	*Recordkeeping* *Contractor certification and training.*	X		
4	54	NESHAP Applicability	All	NA	Determine applicability under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement. If a source becomes affected by an applicable subpart of 40 C.F.R. 63, shall notify the Department and the Administrator as required by the applicable subpart and in accordance with 40 C.F.R. 63.9(b)(1) and comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 C.F.R. 63.6(c).	*Recordkeeping* *Notification not required during the certification period.*	X		
5	58, 59, 60	Adminstration Fees and Assessable Emissions	N/A	Entire Stationary Source	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. If CPAI wishes to pay fees based on actual emissions, emissions estimates must be submitted to the Department by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		

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							Continuous	Intermittent	Not Triggered
5	61.1	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Perform regular maintenance considering manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
5	61.2	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Keep records of any maintenance that would have a significant effect on emissions.	*Recordkeeping*	X		
5	61.3	Good Air Pollution Control	106, 107, 415, 416, 417, 518, 742, 743	Non NSPS emission units	Keep a copy of manufacturer's or operator's maintenance procedures.	*Recordkeeping*	X		
5	62	Dilution	NA	NA	Do not dilute emissions to comply with permit.	*Reasonable Inquiry*	X		
5	63	Fugitive Emissions	All	NA	Take reasonable precautions to prevent particulate matter from being emitted into air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project.	*Reasonable inquiry*	X		
5	63.1a	Fugitive Emissions	All	NA	Keep records of all complaints received.	*Records of complaints* *No complaints received during the certification period or for the past 5 years. No ADEC inspections have identified potential fugitive dust problems.*			X
5	63.1b, 63.2	Fugitive Emissions	All	NA	Keep records of any additional precautions taken to: 1 - address complaints; or 2 - address the results of Department inspections which found potential problems; and 3 - prevent future dust problems Report according to Condition 65.	*Records of Complaints/* *Reporting in accordance with Condition 65*			X
5	64	Stack Injection	All	NA	Do 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 unless approved in writing by the Department.	*Reasonable Inquiry*	X		
5	27.4b, 63.2, 65	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Do not permit any emission that is injurious to human health or welfare, animal or plant life, or property, or that would unreasonably interfere with enjoyment of life or property.	*Recordkeeping*	X		

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							Continuous	Intermittent	Not Triggered
5	27.4b, 63.2, 65.1	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Report any emissions that present a potential threat to human health or safety.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known emissions that present a threat to human health or safety.*			X
5	27.4b, 63.2, 65.2	Air Pollution Prohibited	All	All emission units, including insignificant emission units	As soon as practicable after becoming aware of a complaint, investigate the complaint to identify emissions that CPAI believes have caused or are causing a violation of Condition 65.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known compliants during the certification period.*			X
5	27.4b, 63.2, 65.3	Air Pollution Prohibited	All	All emission units, including insignificant emission units	Initiate and complete corrective action necessary to eliminate any violation identified by a complaint as soon as practicable if CPAI believes that stationary source emissions are causing the violation or if the Department notifies CPAI that it has found a violation of Condition 65.	*Recordkeeping* *Verified that condition was not triggered during certification period. No known compliants during the certification period.*			X
5	27.4b, 63.2, 65.4	Air Pollution Prohibited Recordkeeping	All	All emission units, including insignificant emission units	Keep records of: -date, time, and nature of all emissions complaints received -name of person that complained, if known -summary of investigation, including the reasons CPAI does or does not believe emissions caused a violation -any corrective actions taken or planned for complaints attributable to stationary source emissions.	*Recordkeeping* *No known complaints during the certification period.*	X		
5	27.4b, 63.2, 65.5	Air Pollution Prohibited Reporting	All	All emission units, including insignificant emission units	Include a brief summary report with each Operating Report which contains: -the number of complaints received -number of times CPAI or ADEC found corrective action necessary -number of times corrective action was taken within 24 hours -status of corrective action CPAI or ADEC found necessary that were not taken within 24 hours	*Operating Reports* *No known complaints during the certification period. Documentation of no complaints was stated in Operating Reports.*	X		
5	27.4b, 63.2, 65.6	Air Pollution Prohibited Reporting	All	All emission units, including insignificant emission units	Notify the Department of a complaint that is attributable to stationary source emissions within 24 hours of receiving the complaint, unless CPAI has initiated corrective action within 24 hours of receiving the complaint.	*Recordkeeping* *Verified that condition was not triggered during certification period. CPAI did not receive any complaints attributable to stationary source emissions.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
5	66	Technology Based Emission Standard	All	NA	Take all reasonable steps to minimize emissions when an unavoidable emergency, malfunction or non-routine repair causes emissions in excess of a technology-based emission standard listed in Conditions 16 through 19, 36, 38, 39, or 40.	*Recordkeeping* *No emissions in excess of a technology-based emission standard occurred or were discovered during the certification period.*			X
					Give the Department written notice within 2 working days after an unavoidable emergency, malfunction or non-routine repair causing emissions in excess of a technology-based emission standard commenced or was discovered, as required by Condition 82.1b.	*Recordkeeping* *No emissions in excess of a technology-based emission standard occurred or were discovered during the certification period.*			X
5	67	Open Burning	All	NA	When conducting open burning: -keep materials dry -separate non-combustibles -assure natural or artificially induced draft is present -separate from grass or peat moss -do not allow to smolder. Keep written records to demonstrate that the Permittee complies with the requirements of 18 AAC 50.065. Upon request by the Department, submit copies of the records.	*Recordkeeping*	X		
6	68	ADEC Requested Source Tests	All	NA	Conduct source testing as requested by the Department.	*ADEC did not request any source tests during the certification period.*			X
6	69-77	General Source Testing Requirements	All	NA	Comply with the provisions of Section 6 when source tests are conducted.	*Recordkeeping/Source Test Plans/Source Test Reports* *Source tests during the certification period were conducted in accordance with Section 6 of the permit.*	X		
7	78	Recordkeeping Requirements	All	NA	Keep copies of all reports, certifications and monitoring required by Title V permit for at least 5 years after date of collection.	*Recordkeeping*	X		
7	79	Certification	All	All emission units, including insignificant emission units	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	80	Submittals	All	NA	Unless otherwise directed by the Department or the permit, send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping* *All reports were submitted to ADEC Fairbanks office except as noted below:* *EI Report: Submitted to Juneau per ADEC request.* *Emission Fee Estimates: Submitted to Juneau per Condition 60.1.* *Title V permit applications: Submitted to Anchorage per Condition 87.1.*	X		
7	81	Information Requests	All	NA	Upon request, furnish the Department with any information needed to determine whether cause exists to modify, revoke and reissue or terminate Title V permit and to determine compliance with Title V permit.	*Recordkeeping* *ADEC requested information in conjunction with a full compliance evaluation during the certification period. CPAI's response to the request was submitted 1/3/2019 (outside the certification period).*			X
7	82.1a	Excess Emission and Permit Deviation Reports	All	NA	Report emissions that present a potential threat to human health or safety and excess emissions that Permittee believes to be unavoidable as soon as possible after event commenced or was discovered.	*Recordkeeping* *Not applicable during the certification period.*			X
7	82.1b	Excess Emission and Permit Deviation Reports	All	NA	Report an unavoidable emergency, malfunction, or non-routine repair that causes emissions in excess of a technology based emission standard within 2 working days after event commenced or was discovered.	*Recordkeeping* *Not applicable during the certification period.*			X
7	82.1c(i)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations not described in Conditions 82.1a, 82.1b, and 82.1c(ii)-(iii) within 30 days of end of month in which the emissions or deviation occurred.	*Recordkeeping* *Not applicable during the certification period.*			X
7	82.1(c)(ii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations within 72 hours of discovery for a continuous or recurring excess emission that is not corrected within 48 hours of discovery.	*Recordkeeping* *Not applicable during the certification period.*			X
7	82.1(c)(iii)	Excess Emission and Permit Deviation Reports	All	NA	Report excess emissions and permit deviations according to the required deadline for failure to monitor, as specified in Conditions 5.2b and 10.1b.	*Recordkeeping* *Not applicable during the certification period.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	82.2	Excess Emission Reports	All	NA	Report excess emissions or permit deviations using the Department's online form or form in Section 13 Operating Permit No. AQ0489TVP02. Provide all information that is called for by the form that is used.	*Recordkeeping* *Not applicable during the certification period.*			X
7	82.3	Excess Emission and Permit Deviation Reports	All	NA	Provide a more detailed written report when requested by the Department.	*Recordkeeping* *No information was requested by ADEC regarding EE/PD reports during the certification period.*			X
7	83	Operating Report	All	NA	Submit an Operating Report by May 15 for January 1 to March 31, by August 15 for April 1 to June 30, by November 15 for July 1 to September 30, and by February 15 for October 1 to December 31.	*Recordkeeping/ Operating Reports*	X		
7	83.1	Operating Report	All	NA	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/ Operating Reports*	X		
7	83.2	Operating Report	All	NA	When excess emissions or permit deviations occurred during the reporting period and were not yet reported, identify in the Operating Report: a. date of deviation b. equipment involved c. permit condition affected d. description of excess emissions or permit deviations e. any corrective action or preventative measures taken and dates of such actions.	*Recordkeeping/ Operating Reports* *Not applicable during the certification period.*			X
7	83.3	Operating Report	All	NA	When excess emissions or permit deviations during the certification period have already been reported, cite the date(s) of those report(s) in the Operating Report.	*Recordkeeping/ Operating Reports*			X
7	83.4	Operating Report	All	NA	The Operating Report must include for the period covered by the report a listing of emissions monitored under Conditions 3.1e, 8.2, and 38.1a 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.	*Recordkeeping/ Operating Reports* *No additional monitoring required during the certification period.*			X
7	83.5	Operating Report	All	NA	For the first period of a renewed or revised operating permit, also provide the previous permit's (or previous permit version's) operating report elements covering that partial period immediately preceding the effective date of the renewed or revised permit.	*Operating Reports* *Not applicable during the certification period.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
7	84, 84.1, 84.3	Annual Compliance Certification	All	NA	- Submit to the Department an annual compliance certification report for the prior year by March 31. - Submit a copy of the annual certification report to EPA. - Include required information and certification statement.	*Recordkeeping* *The annual compliance certification was sent to ADEC and EPA by March 31.*	X		
7	84.2	Annual Compliance Certification	All	NA	For the first period of a renewed or revised operating permit, also provide the previous permit's (or previous permit version's) annual compliance certification elements covering that partial period immediately preceding the effective date of the renewed or revised permit.	*Annual Compliance Certification Reports* *Not applicable during the certification period.*			X
7	85.1	NSPS and NESHAP Reports	All	NA	Attach a copy of any NSPS and NESHAPs notifications and reports submitted to EPA with Operating Reports unless copies have already been provided to the Department.	*Recordkeeping/ Operating Reports*	X		
7	85.2	NSPS and NESHAP Reports	All	NA	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 that EPA approved during the effective duration of the permit.	*Recordkeeping* *ADEC did not request this information during the certification period.*			X
					Keep a copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule with the permit.	*Recordkeeping*	X		
7	86, 86.1	Emission Inventory Reporting	All	NA	Every year by April 30, submit to ADEC reports of actual emissions, by emission unit, of CO, NH3, NOx, PM10, PM2.5, SO2, VOCs, Lead and Lead compounds if the PTE for the Alpine CPF during the previous calendar year equals or exceeds: 250 tpy of NH3, PM10, PM2.5 or VOCs or 2,500 tpy of CO, NOx, or SO2.	*Emission Inventory Reports* *Reporting not required during the certification period.*			X
7	86, 86.2, 86.3	Emission Inventory Reporting	All	NA	Every third year by April 30, submit to ADEC reports of actual emissions, by emission unit, of CO, NH3, NOx, PM10, PM2.5, SO2, VOCs, Lead and Lead compounds if the PTE (except actual emissions for Pb) for the Alpine CPF during the previous calendar year equals or exceeds: 0.5 tpy of actual Pb or 1,000 tpy of CO; or 100 tpy of SO2, NH3, PM10, PM2.5, NOx, or VOCs Reporting shall commence in 2018 for calendar year 2017, 2021 for the calendar year 2020, etc.	*Emission Inventory Reports* *Reporting not required during the certification period.*			X
7	86.4	Emission Inventory Reporting	All	NA	For Emissions Inventory Reporting, include the required data elements contained within the form in Section 14 of the permit or those contained in Table 2A of Appendix A to Subpart A of 40 CFR 51 for each stack associated with an emission unit.	*Emission Inventory Reports* *Reporting not required during the certification period.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
8	87	Permit Applications and Submittals	All	NA	Submit original applications to renew or modify the operating permit to the Department's Anchorage Office. A copy of any applications, compliance plan, or addenda shall also be submitted to EPA Region 10.	*Permit Applications* *No applications for permit renewal or modification were submitted during the certification period.*			X
8	88	Emissions Trading	All	NA	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.	*Advisory Condition*	X		
8	89	Off Permit Changes	All	NA	CPAI may make changes that are not addressed or prohibited by the permit, without permit revision, provided that the following requirements are met: 1) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; 2) For off permit changes that result in additional emission units that do not qualify as insignificant, CPAI shall submit contemporaneous notice to EPA and the Department describing the change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change; and 3) A record is kept describing changes made at the 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.	*Recordkeeping* *Not triggered*			X
8	90	Operational Flexibility	All	NA	CPAI may make 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 Clean Air Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions). For a change in operation, CPAI shall provide EPA and the Department with a notification no less than 7 days in advance of the proposed change. The notification shall include: - a brief description of the change; - 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.	*Recordkeeping* *Not triggered*			X
8	91	Permit Renewal	All	NA	Submit to the Department and EPA an application to renew the Title V permit between 6 and 18 months before expiration of the current Title V permit. (No sooner than August 1, 2019 and no later than August 1, 2020.)	*Permit Renewal Application* *Not required during the certification period.*			X

Title V Compliance Certification Report - Alpine Central Processing Facility - ConocoPhillips Alaska, Inc. Permit No. AQ0489TVP02 (Revision 2) - for the Reporting Period October 11 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	OBLIGATION	Method [1]	COMPLIANCE STATUS		
							Continuous	Intermittent	Not Triggered
9	92	General Compliance Requirements	All	NA	Compliance with permit terms and conditions is considered to be compliance with those requirements that are included and specifically identified in the permit or determined in writing in the permit to be inapplicable.	*Advisory Condition*	X		
9	93	General Compliance Requirements	All	NA	Comply with each permit term and condition.	*Compliance status is based on the status of compliance with all other permit conditions.* *There were no excess emissions or permit deviations during the certification period.*	X		
9	94	General Compliance Requirements	All	NA	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.	*Advisory Condition*	X		
9	95	General Compliance Requirements	All	NA	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: 1) enter upon the premises where a source subject to the permit is located or where records required by the permit are kept; 2) have access to and copy any records required by the permit; 3) inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and 4) sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.	*Recordkeeping* *No site visits or inspections during the certification period.*			X
9	96	Compliance Schedule	All	NA	Comply with applicable requirements that become effective during the permit term on a timely basis.	*Recordkeeping/ NSPS Subpart OOOOa Reports* *NSPS Subpart OOOOa first became applicable to the Alpine CPF on 2/15/2017 at the CD2 drill site. Documentation of this new applicable requirement was submitted to ADEC in an off-permit change notification on 2/15/2018.*	X		

[1] "Monitoring not required" means that the permit did not require any compliance monitoring and there was no other reasonably available and material information indicating noncompliance.

Attachment No. 8
Alpine Non-TCA

ConocoPhillips
Alaska, Inc

ANNUAL CERTIFICATION REPORT

Reporting Period January 1 through December 31, 2018

Air Quality Operating Permit No. AQ1412TVP01

ConocoPhillips Alaska, Inc.

Non-TCA Doyon 19 Drill Rig at Alpine

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.

Erik Keskula
Manager, North Slope Integrated Operations & Engineering

29 MAR 2019
Date

ED_004016I_00012166-00287

ConocoPhillips Alaska, Inc

Title V Compliance Certification Report - Non-TCA Doyon 19 Drill Rig at Alpine - ConocoPhillips Alaska, Inc.
Permit No. AQ1412TVP01 - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	Obligation	Method [1]	Compliance Status		
							Continuous	Intermittent	Not Triggered
3	1 - 8	All Conditions in Permit Section 3	All	Entire Stationary Source	(1, 8.1) Visible Emissions Standard; (2, 8.2) Particulate Matter Emissions Standard; (3, 8.3) Sulfur Compound Emissions Standard; (4) Limits while operating at CD-1 and CD-2; (5) Limits while operating at CD-3 and CD-4; (6) Monitor operating time; (7) Fuel oil sulfur content limit; (8.4) General MR&R for Insignificant Emissions Units.	*Recordkeeping* *The Doyon 19 Drill Rig did not operate at Alpine under this permit during the certification period.*			X
4	9 - 11	Advisory	All	Entire Stationary Source	Various Advisory Conditions	*Advisory Conditions*	X		
4	12	Permit Administration Fees	All	Entire Stationary Source	Pay to the Department all assessed permit administration fees.	*Recordkeeping*	X		
4	13, 14	Assessable Emissions	All	Entire Stationary Source	Emissions fees must be paid based on assessable PTE or projected actual annual emissions. To pay fees based on projected actual emissions, estimates of such emissions must be submitted to ADEC by March 31.	*Fees were paid based on projected actual annual emissions estimates. Emission estimates were submitted by March 31.*	X		
4	21	NESHAPs Applicability	All	Entire Stationary Source	Determine applicability under NESHAPs by determining if an emission unit which emits or has potential to emit one or more HAP is subject to a relevant standard or other requirement. If a source becomes affected by an applicable subpart of 40 C.F.R. 63, shall notify the Department and the Administrator as required by the applicable subpart and in accordance with 40 C.F.R. 63.9(b)(1) and comply with such standard by the compliance date established by the Administrator in the applicable subpart, in accordance with 40 C.F.R. 63.6(c).	*Recordkeeping*	X		
4	15 - 20	All Remaining Conditions in Permit Section 4	All	Entire Stationary Source	(15) Good Air Pollution Control Practice; (16) Dilution prohibition; (17) Take reasonable precautions to prevent fugitive dust; (18) Stack injection prohibition; (19) Air pollution prohibition; (20) Take reasonable steps to minimize emissions in excess of a technology-based emissions standard.	*Recordkeeping* *The Doyon 19 Drill Rig did not operate at Alpine under this permit during the certification period.*			X
5	22	ADEC Requested Source Tests	All	Entire Stationary Source	Conduct source testing as requested by ADEC.	*ADEC did not request any source tests during the certification period.*			X
5	23-31	General Source Testing Requirements	All	Entire Stationary Source	Comply with the provisions of Section 5 when source tests are conducted.	*Recordkeeping* *No source tests were conducted during the certification period.*			X
6	32	Recordkeeping Requirements	All	Entire Stationary Source	Keep copies of all reports, certifications and monitoring required by the permit for at least 5 years after date of collection.	*Recordkeeping*	X		

ConocoPhillips Alaska, Inc

Title V Compliance Certification Report - Non-TCA Doyon 19 Drill Rig at Alpine - ConocoPhillips Alaska, Inc.
Permit No. AQ1412TVP01 - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	Obligation	Method [1]	Compliance Status		
							Continuous	Intermittent	Not Triggered
6	33	Certification	All	Entire Stationary Source	Any report, compliance certification or other document required by the permit must be signed by a responsible official and include 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."	*Recordkeeping*	X		
6	34	Submittals	All	Entire Stationary Source	Unless otherwise directed by the Department or this permit, send reports, compliance certifications and other documents to ADEC, Air Permits Program, 610 University Ave, Fairbanks, AK 99709-3643 ATTN: Compliance Technician.	*Recordkeeping* *All reports were submitted to ADEC Fairbanks office except as noted below:* *Emission Fee Estimates: Submitted to ADEC Juneau office per Condition 14.1.* *Emissions Inventory Report: Submitted via e-mail as allowed by ADEC emissions inventory report instructions.*	X		
6	35	Information Requests	All	Entire Stationary Source	Upon request, furnish ADEC with any information needed to determine whether cause exists to modify, revoke and reissue or terminate the permit and to determine compliance with the permit.	*Recordkeeping* *CPAI provided all information requested by ADEC during the certification period.*	X		
6	36	Excess Emissions and Permit Deviation Reports	All	Entire Stationary Source	Report excess emissions and permit deviations.	*Recordkeeping* *No EE or PD reports were required during the certification period.*			X
6	37	Operating Report	All	Entire Stationary Source	Submit one original and one copy of Operating Reports by May 15 for the period January 1 to March 31, by August 15 for the period April 1 to June 30, by November 15 for the period July 1 to September 30, and by February 15 for the period October 1 to December 31 of the previous year.	*Recordkeeping/* *Operating Reports*	X		
6	37.1	Operating Report	All	Entire Stationary Source	Include all information required to be in the Operating Reports by other conditions of the permit.	*Recordkeeping/* *Operating Reports*	X		
6	38	Annual Compliance Certification	All	Entire Stationary Source	- Submit to ADEC Fairbanks office an annual compliance certification report for the prior year by March 31. - Include required information and certification statement - Submit a copy of the annual compliance certification report to EPA Region 10.	*Recordkeeping* *The annual compliance certification was sent to ADEC and EPA by March 31.*	X		
6	39, 39.1, 39.2	Emission Inventory Reporting	All	Entire Stationary Source	Every third year by March 31, submit to ADEC reports of actual emissions, by emission unit, of CO, NH3, NOx, PM10, PM2.5, SO2, VOCs, Lead and Lead compounds using the form in Section 13 of this permit as outlined in Conditions 39.1 through 39.3. Reporting shall commence in 2018 for calendar year 2017, 2021 for the calendar year 2020, etc.	*Emission Inventory Reports* *Triennial Emissions Inventory Report was submitted to ADEC by 4/30/2018 as directed by ADEC e-mail correspondence.*	X		

ConocoPhillips Alaska, Inc

Title V Compliance Certification Report - Non-TCA Doyon 19 Drill Rig at Alpine - ConocoPhillips Alaska, Inc.
Permit No. AQ1412TVP01 - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	Obligation	Method [1]	Compliance Status		
							Continuous	Intermittent	Not Triggered
6	39.3	Emission Inventory Reporting	All	Entire Stationary Source	For Emissions Inventory Reporting, include the required data elements contained within the form in Section 13 of the permit or, for activities not classified as a mobile source, those contained in Table 2A and, for activities classified as a mobile source, Table 2B of Appendix A to Subpart A of 40 C.F.R. 51 for each stack associated with an emission unit.	*Emission Inventory Reports* *Triennial Emissions Inventory Report was submitted to ADEC as required.*	X		
7	40	Permit Applications and Submittals	All	Entire Stationary Source	Submit original applications to renew or modify the operating permit to ADEC's Anchorage Office. A copy of any applications, compliance plan, or addenda shall also be submitted to EPA Region 10.	*Recordkeeping* *Permit renewal application not required during the certification period.*			X
7	41	Emissions Trading	All	Entire Stationary Source	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.	*Advisory Condition*	X		
7	42	Off Permit Changes	All	Entire Stationary Source	CPAI may make changes that are not addressed or prohibited by this permit, without permit revision, provided that the following requirements are met: 1) Each such change shall meet all applicable requirements and shall not violate any existing permit term or condition; 2) For off permit changes that result in additional emission units that do not qualify as insignificant, CPAI shall submit contemporaneous notice to EPA and the Department describing the change, including the date, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change; and 3) A record is kept describing changes made at the 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.	*Recordkeeping* *Not triggered*			X
7	43	Operational Flexibility	All	Entire Stationary Source	CPAI may make 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 Clean Air Act and the changes do not exceed the emissions allowable under the permit (whether expressed therein as a rate of emissions or in terms of total emissions). For a change in operation, CPAI shall provide EPA and the Department with a notification no less than 7 days in advance of the proposed change. The notification shall include: - a brief description of the change; - 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.	*Recordkeeping* *Not triggered*			X

ConocoPhillips Alaska, Inc

Title V Compliance Certification Report - Non-TCA Doyon 19 Drill Rig at Alpine - ConocoPhillips Alaska, Inc.
Permit No. AQ1412TVP01 - for the Reporting Period January 1 through December 31, 2018

Section	Condition	Description	EU ID	Emission Unit Description	Obligation	Method [1]	Compliance Status		
							Continuous	Intermittent	Not Triggered
7	44	Permit Renewal	All	Entire Stationary Source	Submit an application to renew the permit between 6 and 18 months before expiration of the current permit. (No sooner than August 1, 2019 and no later than August 1, 2020.)	*Permit Renewal Application* *Not required during the certification period.*			X
8	45	General Compliance Requirements	All	Entire Stationary Source	Compliance with permit terms and conditions is considered to be compliance with those requirements that are included and specifically identified in the permit or determined in writing in the permit to be inapplicable.	*Advisory Condition*	X		
8	46	General Compliance Requirements	All	Entire Stationary Source	Comply with each permit term and condition.	*Compliance status is based on the status of compliance with all other permit conditions.*	X		
8	47	General Compliance Requirements	All	Entire Stationary Source	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.	*Advisory Condition*	X		
8	48	General Compliance Requirements	All	Entire Stationary Source	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: 1) enter upon the premises where a source subject to the permit is located or where records required by the permit are kept; 2) have access to and copy any records required by the permit; 3) inspect any stationary source, equipment, practices, or operations regulated by or referenced in the permit; and 4) sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.	*Recordkeeping* *No site visits or inspections during the certification period.*			X
8	49	Compliance Schedule	All	Entire Stationary Source	Comply with applicable requirements that become effective during the permit term on a timely basis.	*No new applicable requirements during the permit term to date and none during the certification period.*			X