



REGION 10

SEATTLE, WA 98101

May 5, 2026

Mr. Matt Bonney
Willow Startup O&M Superintendent
ConocoPhillips Alaska, Inc.
PO Box 100360
Anchorage AK 99510-0360

Re: Emissions Test Waiver Request for Solid Waste Incinerator at the Willow Operations Center

Dear Mr. Bonney:

The U.S. EPA Region 10 has reviewed the ConocoPhillips Alaska, Inc. (CPAI) request for an emissions test waiver for a solid waste incinerator located at the Willow Operations Center (WOC) on the North Slope of Alaska, received January 21, 2026. The incinerator is subject to the National Emission Standard for Mercury located at 40 CFR part 61, subpart E (Mercury NESHAP). This letter serves to notify CPAI that the EPA waives emission tests of the incinerator required in 40 CFR 61.53(d)(1) based on the information provided by CPAI as allowed by 40 CFR 61.13(i)(1).

In addition to the Mercury NESHAP, the solid waste incinerator at the WOC is subject to 40 CFR part 60 subpart EEEE, Standards of Performance for Other Solid Waste Incinerators (OSWI) as a very small municipal waste combustion unit. According to the construction permit (AQ1806MSS01, April 11, 2024) issued by the Alaska Department of Environmental Conservation (ADEC), the WOC incinerator will have a capacity of less than 10 tons per day. The applicable OSWI mercury limit emission limit is listed as 12 micrograms per dry standard cubic meter in Table 1b. ADEC will incorporate the OSWI emissions limits and associated compliance requirements into a forthcoming part 70 operating permit.

By using the OSWI mercury emission limit and EPA Method 19, CPAI estimates mercury emissions from the WOC incinerator would conservatively be 0.0026 pounds per day. These estimated mercury emissions are less than one tenth of one percent of the Mercury NESHAP emission standard located in 40 CFR 61.52, which is 7.1 pounds per day. Due to the greater than three order of magnitude factor of safety between the emissions allowed by the OSWI Rule and those allowed by the Mercury NESHAP emission standard, pursuant to 40 CFR 61.13(i)(1), the EPA waives the Mercury NESHAP emissions tests required in 40 CFR 61.53(d)(1).

If you have any questions about this matter, please contact Ms. Valerie Gardner of my staff at (907) 271-6561 or gardner.valerie@epa.gov.

Sincerely,

KARL PEPPL Digitally signed by KARL PEPPL
Date: 2026.05.05 11:39:41 -07'00'

Karl Pepple, Manager
Air Permits, Toxics, Transportation
and Communities Branch
Air and Radiation Division

cc: Ms. Jamie Brewer
ConocoPhillips Alaska, Inc.

Mr. Moses Coss
Alaska Department of Environmental Conservation