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**Colorado Department  
of Public Health  
and Environment**

**OPERATING PERMIT**

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE

ISSUED JULY 1, 2002



# AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

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FACILITY NAME: Rocky Flats Environmental Technology Site OPERATING PERMIT NUMBER  
FACILITY ID: 0590003 **96OPJE124**  
ISSUE DATE: July 1, 2002  
EXPIRATION DATE: July 1, 2007  
MODIFICATIONS: See Appendix F of Permit

Issued in accordance with the provisions of the Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations

ISSUED TO: U.S. Dept of Energy/Kaiser-Hill LLC  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

PLANT SITE LOCATION: Rocky Flats Environmental Technology Site  
10808 Highway 93, Unit A  
Golden, CO 80403-8200

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## INFORMATION RELIED UPON

Operating Permit Application Received: February 13, 1996  
And Additional Information Received: July 1, 1999

Nature of Business: Decommissioning, special nuclear material management, env restoration  
Primary SIC: 8734, 9999

## RESPONSIBLE OFFICIAL

Name: Joseph A. Legare/David Shelton  
Title: Asst Mgr for E&I/Vice President K-H

## FACILITY CONTACT PERSON

Name: Jonathan Dion/Andrew Rosenman  
Title: Env Engineer/K-H Env Services

Phone: (303) 966-5918/(303) 966-9877

Phone: (303) 966-5904/(303) 966-3687

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## SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: July 1 through- December 31, January 1 through June 30  
Semi-Annual Monitoring Report: February 1, 2003 & August 1, 2003 and subsequent years)  
Annual Compliance Period: July 1 through June 31  
Annual Compliance Certification: August 1, 2003 and subsequent years

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# TABLE OF CONTENTS:

<b>SECTION I - General Activities and Summary</b> .....	<b>1</b>
1. Permitted Activities .....	1
2. Alternative Operating Scenarios .....	2
3. New Source Review .....	2
4. Accidental Release Prevention Program (112(r)) .....	2
5. Summary of Emission Units .....	3
<b>SECTION II - Specific Permit Terms</b> .....	<b>4</b>
1. F002 – Building 219, Existing Landfill .....	4
2. P003 – Gasoline Storage and Dispensing Facility: .....	5
3. B004 – Keeler Dual Fuel Fired Boiler B006 – Erie City Dual Fuel Fired Boiler .....	6
B005 – Keeler Dual Fuel Fired Boiler B007 – Combustion Engineering Dual Fuel Fired Boiler .....	6
4. P008 – Thermal Research Spray Dryer .....	10
5. P010 – Diesel Fuel Equipment .....	11
6. Radionuclide Requirements .....	13
<b>SECTION III - Permit Shield</b> .....	<b>15</b>
1. Specific Conditions .....	15
2. General Conditions .....	15
<b>SECTION IV - General Permit Conditions</b> .....	<b>17</b>
1. Administrative Changes.....	17
2. Certification Requirements .....	17
3. Common Provisions.....	17
4. Compliance Requirements .....	20
5. Emergency Provisions .....	21
6. Emission Standards for Asbestos.....	21
7. Emissions Trading, Marketable Permits, Economic Incentives.....	22
8. Fee Payment .....	22
9. Fugitive Particulate Emissions.....	22
10. Inspection and Entry .....	22
11. Minor Permit Modifications .....	22
12. New Source Review .....	23
13. No Property Rights Conveyed .....	23
14. Odor.....	23
15. Off-Permit Changes to the Source .....	23
16. Opacity .....	23
17. Open Burning .....	23
18. Ozone Depleting Compounds.....	23
19. Permit Expiration and Renewal .....	24
20. Portable Sources .....	24
21. Prompt Deviation Reporting.....	24
22. Record Keeping and Reporting Requirements.....	24
23. Reopenings for Cause .....	25
24. Section 502(b)(10) Changes .....	25
25. Severability Clause .....	26
26. Significant Permit Modifications .....	26
27. Special Provisions Concerning the Acid Rain Program .....	26
28. Transfer or Assignment of Ownership.....	26
29. Volatile Organic Compounds .....	26
30. Wood Stoves and Wood burning Appliances .....	27
<b>APPENDIX A - Inspection Information</b> .....	<b>1</b>

## **TABLE OF CONTENTS:**

<b>APPENDIX B Reporting Requirements and Definitions .....</b>	<b>1</b>
<b>APPENDIX C Required Format for Annual Compliance Certification Report .....</b>	<b>1</b>
<b>APPENDIX D Notification Addresses.....</b>	<b>1</b>
<b>APPENDIX E Permit Acronyms .....</b>	<b>1</b>
<b>APPENDIX F Permit Modifications .....</b>	<b>1</b>
<b>APPENDIX G Diesel Fuel Equipment List.....</b>	<b>1</b>

## SECTION I - General Activities and Summary

### 1. Permitted Activities

1.1 The Rocky Flats Environmental Technology Site occupies an area of 6,550 acres in northern Jefferson County, Colorado, approximately 16 miles northwest of Denver. The Site was formerly part of a United States Government nationwide nuclear weapons research, development, and production complex. Prior to February 1992, the primary mission of the Site was the fabrication of nuclear weapons components from plutonium, uranium, beryllium, and stainless steel. Production activities included metal fabrication and assembly, chemical recovery and purification of process-produced transuranic radionuclides, and related quality control functions. Plutonium weapons operations were curtailed at the Site in 1989; nuclear weapons production has not and will not resume at the Site.

The Site is currently operated by Kaiser-Hill Company, L.L.C., with oversight by The Department of Energy, Rocky Flats Field Office. The current Site mission is special nuclear material management, environmental restoration, waste management, and building decommissioning and demolition.

The major equipment at this facility includes gasoline storage tanks and dispensing equipment, four dual fuel-fired steam boilers, a spray dryer with baghouse and HEPA filtration, and a variety of diesel fuel equipment.

The Site is located along the front range between the cities of Golden and Boulder in Jefferson County. It is located within 100 kilometers of Rocky Mountain National Park and Eagle's Nest National Wilderness Area.

The area in which the plant operates is designated as non-attainment for particulate matter less than 10 microns (PM<sub>10</sub>). In addition, the Denver metro area is classified as attainment/maintenance for ozone and carbon monoxide. Under that classification, all SIP-approved requirements for VOC and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act.

1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.

1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This Operating Permit incorporates the applicable requirements (except as noted in Section II) from the following Colorado Construction Permit(s): 96JE474, 92JE833, 93JE542, and 93JE1349.

1.4 All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**

Permit Condition Number(s): Section IV - Conditions 13 and 17 (as noted).

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 21 of the General Conditions in Section IV of this permit.

## **2. Alternative Operating Scenarios**

There are no Alternative Operating Scenarios specified for this site.

## **3. New Source Review**

3.1 This facility is a major stationary source (potential to emit of a non-attainment pollutant or PM<sub>10</sub> precursor > 100 tpy) for the purposes of non-attainment New Source Review (Colorado Regulation 3, Part B, Section IV.D.2), but has not yet had to go through non-attainment New Source Review. NO<sub>x</sub> is considered to be a precursor for PM<sub>10</sub> in the Denver non-attainment area. Future modifications at the facility which trigger significance levels for the pollutants as defined in Colorado Regulation No. 3, Part A, Section I.B.57 will require that non-attainment NSR requirements be met.

3.2 This facility is located in an area designated attainment for all pollutants except PM<sub>10</sub>. Based on the information provided by the applicant, it is not categorized as a major stationary source (no single criteria pollutant emissions with a Potential to Emit of greater than 250 TPY as of the issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part B, Section IV.D.3).

Future modifications to this facility may result in an exceedance of the major source threshold. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part A, Section I.B.37 and 58) for any pollutant as listed in Regulation No. 3, Part A, Section I.B.58 may result in the application of the PSD review requirements. In addition, a future modification at this facility at any time, that is major by itself, may also result in the application of the PSD review requirements.

3.3 There are no other Operating Permits associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations.

## **4. Accidental Release Prevention Program (112(r))**

4.1 Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

**5. Summary of Emission Units**

5.1 The emissions units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
F002	014	S002	Building 219, Existing Landfill	None
P003	255	S003	Gasoline Storage and Dispensing Facility	None
B004	001	S004	Keeler Model NB4171 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-4	None
B005	003	S005	Keeler Model NB4172 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-5	None
B006	005	S006	Erie City Model Keystone Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 97913	None
B007	007	S007	Combustion Engineering Model 10B11047 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 85173	None
P008	137	S008	Thermal Research Model 7028SC Spray Dryer Serial Number 630	Two Stage HEPA Filtration System
P010	250	S010	Diesel Fuel Equipment	None

**SECTION II - Specific Permit Terms**

**1. F002 – Building 219, Existing Landfill**

Parameter	Permit Condition	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
APEN Reporting	1.1	N/A			Certification	Annually
Fugitive Particulate Emissions	1.2	N/A			Certification	Semi-Annually

1.1 The source shall certify annually that they are in compliance with the requirements for submitting revised APENs for this source (Colorado Regulation No. 3, Part C, Section II.C).

1.2 The source shall employ such control measures and operating practices as are necessary to minimize fugitive particulate emissions (Colorado Regulation No. 1, Section III.D). The source shall certify semi-annually that all appropriate measures have been taken to minimize fugitive emissions.

**2. P003 – Gasoline Storage and Dispensing Facility:**

**One (1) 10,000 gallon underground storage tank for unleaded gasoline**

**One (1) 6,000 gallon underground storage tank for unleaded gasoline**

**One (1) 6,000 gallon underground storage tank for gasoline/ethanol blend**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	2.1	N/A	2.34 tons/yr	11.0 lbs/1000 gallons (refueling)	Recordkeeping	Monthly
				2.0 lbs/1000 gallons (storage)		
Throughput	2.2	N/A	360,000 gallons/yr	N/A	Recordkeeping	Monthly
Vapor Recovery	2.3	N/A	N/A	N/A	Recordkeeping	Annual Certification

2.1 Emissions of VOC resulting from fuel storage and dispensing shall not exceed the limitation stated above (Colorado Construction Permit 96JE474). Compliance with the annual emission limit shall be assumed if the volume of fuel loaded annually does not exceed the limit stated above.

2.2 Total fuel dispensed from these tanks shall not exceed 360,000 gallons per year (Colorado Construction Permit 96JE474). A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

2.3 This source is subject to Regulation No. 7, Part VI.B.3.b which requires that approved fittings for a vapor recovery system be installed on all gasoline storage tanks. To minimize gasoline vapor emissions, the operator shall ensure that the tanks are only filled with fuel from a certified delivery truck equipped with an approved vapor recovery system and that the system is properly connected during the entire filling operation.

**3. B004 – Keeler Dual Fuel Fired Boiler B006 – Erie City Dual Fuel Fired Boiler**  
**B005 – Keeler Dual Fuel Fired Boiler B007 – Combustion Engineering Dual Fuel Fired Boiler**

Parameter	Permit Condition	Limitations (total for all boilers)		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx (natural gas)	3.1	N/A	121.2 TPY	See Condition 3.1	Recordkeeping and Calculation	Monthly
NOx (diesel fuel)				24.0 lbs/ 1000 gallons		Monthly
CO (natural gas)		N/A	63.41 TPY	157.9 lbs/ MMscf	Recordkeeping and Calculation	Monthly
CO (diesel fuel)				5.0 lbs/ 1000 gallons		
VOC (natural gas)		N/A	2.21 TPY	5.5 lbs/ MMscf	Recordkeeping and Calculation	Monthly
VOC (diesel fuel)				0.2 lbs/ 1000 gallons		
SO <sub>2</sub> (natural gas)		N/A	1.31 TPY	0.6 lbs/ MMscf	Recordkeeping and Calculation	Monthly
SO <sub>2</sub> (diesel fuel)				21.3 lbs/ 1000 gallons		
PM <sub>10</sub> (natural gas)		N/A	3.09 TPY	7.6 lbs/ MMscf	Recordkeeping and Calculation	Monthly
PM <sub>10</sub> (diesel fuel)				1.0 lbs/ 1000 gallons		
Particulate (natural gas)	3.1, 3.2	0.5(FI) <sup>-0.26</sup>	3.14 TPY	7.6 lbs/ MMscf	Fuel Restriction	Annual Certification
Particulate (diesel fuel)				2.0 lbs/ 1000 gallons		
Fuel Use (natural gas)	3.3	N/A	800 MMscf/yr	N/A	Fuel Meter	Monthly
Fuel Use (diesel fuel)		N/A	100,000 gallons/yr	N/A	Fuel Meter	Monthly
Use of Fuel Oil	3.4	N/A		N/A	Recordkeeping	Annually
Opacity	3.5	Not to exceed 20% except as provided in condition 3.6		N/A	Recordkeeping	Annual Certification; Method 9 as Necessary

	3.6	For certain operational activities, not to exceed 30% for a period or periods aggregating more than six (6) minutes in any consecutive sixty (60) minutes	N/A	Recordkeeping	Annual Certification
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3.1 Emissions of nitrogen oxides, carbon monoxide, volatile organic compounds, sulfur dioxide, particulate and PM<sub>10</sub> shall not exceed the limitations stated above (Colorado Construction Permit 92JE833). Annual emissions of each pollutant shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/year} = (\text{EF}_{\text{nat gas}}) \times (\text{Fuel Use}_{\text{nat gas}}, \text{MMscf/year}) + (\text{EF}_{\text{diesel}}) \times (\text{Fuel Use}_{\text{diesel}}, \text{Mgal/year})$$

Natural gas consumption shall be tracked separately for each boiler. Nitrogen oxide emissions from each boiler shall be calculated separately by using the emission factors listed below. The nitrogen oxide emissions shall then be totaled to determine compliance with the annual emission limit.

- Boiler #4: 276.7 lbs/MMscf natural gas consumed
- Boiler #5: 300.0 lbs/MMscf natural gas consumed
- Boiler #6: 254.4 lbs/MMscf natural gas consumed
- Boiler #7: 391.0 lbs/MMscf natural gas consumed

Emissions shall be calculated by the end of each subsequent month. A twelve-month rolling total of emissions shall be maintained for demonstration of compliance with annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.2 Particulate emissions shall not exceed the limit, in pounds per million Btu, described by the equation above, where FI is the fuel input in million Btu per hour (Colorado Regulation No. 1, Section III.A.1). In the absence of credible evidence to the contrary, compliance with the particulate emissions limit shall be presumed whenever natural gas is used as fuel for this heater.

3.3 Fuel consumption shall not exceed the limitations stated above (Colorado Construction Permit 92JE833). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.4 This source is subject to Regulation No. 1, Section VIII, Restrictions on the Use of Oil as Backup Fuel:

3.4.1 Natural gas shall be the only fuel used from November 1 to March 1 of each year, except under the following circumstances:

- the supplier or transporter of natural gas imposes a curtailment or an interruption of service;
- for necessary testing of equipment used to operate the unit on oil, testing of fuel and training of personnel; or
- when an equipment malfunction at the facility makes it impossible or unsafe for the unit to operating on natural gas

3.4.2 Each stationery source subject to these provisions shall maintain records for a period of two years which include the following information:

- dates and number of hours fuel oil is burned;
- percent sulfur analysis of the fuel oil burned;
- number of gallons burned each day; and
- reason(s) for use of the fuel oil.

3.4.3 By April 1 of each year, each stationery source subject to these provisions shall submit to the Division a report containing the information listed in 3.4.2 above.

3.5 Except as provided in Condition 3.6 below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity in all conditions of this permit unless otherwise specified. (Colorado Regulation No. 1, II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these boilers.

Whenever a boiler is operated on fuel oil for longer than 24 continuous hours, one (1) Method 9 opacity observation shall be performed for each calendar day of operation in excess of the 24 hour period. If any of the opacity observations exceed the applicable standard, additional observations must be performed. Consecutive observations shall be performed until two consecutive observations are in compliance with the standard. The first additional observation, and each successive observation shall be performed no later than 90 minutes after the time of the completion of the previous observation. Copies of any observations exceeding the applicable standard shall be submitted with the next scheduled report.

3.6 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, which is in excess of 30% opacity for a period or periods aggregating more than six (6) minutes in any sixty (60) consecutive minutes (Colorado Regulation No. 1, Section II.A.4).

A record shall be kept of the type, date and time of the commencement and completion of each and every condition subject to Regulation No. 1, Section II.A.4 that results in an exceedance. The records shall be made available for review upon request by the Division.

A record shall be kept of the date and time of the commencement and completion of a start-up mode when burning fuel oil. A change of fuels during continuous firing will not be considered a startup. When a boiler makes a cold start burning fuel oil, one Method 9 opacity observation shall be performed within 60 minutes of ignition (ignition observation) of the fuel oil. If a hot start up of a boiler is initiated within one (1) hour of a boiler trip, then an opacity observation within 60 minutes of the hot boiler start up is not required. If the ignition observation cannot be performed during daylight hours, an opacity observation shall be required the second calendar day after the calendar day of completion of the startup mode. One opacity observation shall be made for each calendar day while in the startup mode. If the startup mode is initiated and completed during the daylight hours of the same calendar day, only the ignition observation is required. An opacity observation shall be performed the first calendar day after the calendar day of completion of the startup mode.

**4. P008 – Thermal Research Spray Dryer**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM <sub>10</sub>	4.1	N/A	0.0284 lbs/yr	N/A	Calculation	Monthly
Particulate		N/A	0.0284 lbs/yr	N/A	Calculation	Monthly
Salt Production	4.2	N/A	354.25 tons/yr	N/A	Recordkeeping	Monthly
Control Equipment	4.3	Manufacturer's Specifications and Good Maintenance and Operating Procedures		N/A	Maintenance and Recordkeeping	As Needed
Opacity	4.4	Less than or equal to 20%		N/A	Operating Restriction	Annual Certification

4.1 Emissions of particulate and PM<sub>10</sub> shall not exceed the limitations stated above (Colorado Construction Permit 93JE542). In the absence of credible evidence to the contrary, compliance with these limitations shall be presumed if the source follows the Division approved operation and maintenance plan and does not exceed the annual salt production limit listed above.

4.2 Processing of salt shall not exceed the limitation stated above (Colorado Construction Permit 92JE542). A twelve-month rolling total of salt production shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

4.3 This source is equipped with a baghouse as an integral part of the production process that is capable of reducing uncontrolled emissions of PM<sub>10</sub> by at least 98%. This source shall also be equipped with two single stage HEPA filter plenums with efficiencies of at least 99.9% and 99.8%. The equipment being controlled by the baghouse and HEPA filters shall not be operated if the baghouse and HEPA filters are not in operation. The baghouse and HEPA filters shall be operated and maintained in accordance with manufacturer's recommendations and good engineering practices to minimize emissions and ensure compliance with the particulate and opacity standards. Records of baghouse and filter maintenance shall be maintained and made available to the Division upon request.

4.4 Opacity of emissions from this spray dryer shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever the HEPA filters are in operation.

**5. P010 – Diesel Fuel Equipment**

Parameter	Permit Condition	Limitations (total for all equipment)		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	5.1	N/A	60.4 TPY	604.0 lb/1000 gal	Recordkeeping and Calculation	Monthly
CO		N/A	13.0 TPY	130.0 lb/1000 gal		
VOC		N/A	5.75 TPY	57.5 lb/1000 gal		
SO <sub>2</sub>		N/A	3.97 TPY	39.7 lb/1000 gal		
PM <sub>10</sub>		N/A	4.24 TPY	42.4 lb/1000 gal		
Particulate		N/A	4.24 TPY	42.4 lb/1000 gal		
Diesel Fuel Use	5.2	N/A	200,000 gallons/yr	N/A	Recordkeeping and Calculation	Monthly
Opacity	5.3	Less than or equal to 20%		N/A	Method 9 Observation	Annually
Equipment List	5.4	N/A		N/A	Recordkeeping	As Needed

5.1 Emissions of nitrogen oxides, carbon monoxide, volatile organic compounds, sulfur dioxide, particulate and PM<sub>10</sub> shall not exceed the limitations stated above (Colorado Construction Permit 93JE1349). Annual emissions of each pollutant shall be calculated using the fuel-based emission factors (based on the hourly Construction Permit limit) in the following equation:

$$\text{tons/year} = (\text{EF}) \text{H} (12 \text{ Month Fuel Use, } 1000 \text{ gallons/year}) / 2000$$

Emissions shall be calculated by the end of each subsequent month. A twelve-month rolling total of emissions shall be maintained for demonstration of compliance with annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

5.2 Diesel fuel (blend of #1 and #2) consumption shall not exceed the limitations stated above (Colorado Construction Permit 93JE1349). Fuel use shall be calculated based on maximum fuel use and the actual operating hours for each unit by the end of each subsequent month. A twelve-month rolling total shall be

maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

5.3 Opacity of emissions from this equipment shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). A Method 9 observation of each piece of diesel fuel equipment shall be performed annually. During periods of startup, process modification, or adjustment of control equipment visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes.

5.4 The permittee shall maintain an equipment list of all diesel fuel equipment covered by this permit (see Appendix G). The permittee shall notify the Division within 30 days of any equipment addition or deletion.

## **6. Radionuclide Requirements**

This Site is subject to 40CFR Part 61, Subpart H, National Emission Standards for Emissions of Radionuclides Other Than Radon From Department of Energy Facilities. Alternative EPA and CDPHE requirements are described in the Proposal to Use Environmental Sampling for Demonstrating Compliance With 40 CFR 61, Subpart H, dated July 1997, and the 1998 Addendum. The following paragraphs summarize the applicable requirements from this proposal and Subpart H.

### **6.1 Section 61.92**

This section sets the emission standard to be equal to those emitted quantities of radionuclides that yield an effective dose equivalent (EDE) threshold of 10 millirem per year to any member of the public.

### **6.2 Section 61.93**

This section establishes the monitoring and testing procedures required to measure radionuclide emissions and calculate EDEs.

To determine compliance with the standard, radionuclide emissions shall be determined and EDE values to members of the public calculated using EPA-approved sampling procedures, computer models CAP-88 or AIRDOS-PC, or other procedures for which EPA has granted prior approval.

The Site shall demonstrate compliance with the annual 10 mrem standard through environmental measurements of radionuclide air concentrations at critical receptor locations, as outlined in the Proposal to Use Environmental Sampling for Demonstrating Compliance with 40 CFR 61, Subpart H, dated July 1997, and the 1998 Addendum. The Site will employ a 14-sampler network utilizing the existing Radioactive Ambient Air Monitoring Program (RAAMP) samplers at critical receptor locations around the perimeter of the Site. Compliance with the 10 mrem standard will be demonstrated by comparing the annual average of the measured radionuclide concentrations from each of the perimeter RAAMP samplers to the values in 40CFR61 Appendix E, Table 2.

Effluent flow rate measurements at existing significant locations shall be made using the following methods: (i) Reference Method 2 of Appendix A to Part 60 shall be used to determine velocity and volumetric flow rates for stacks and large vents. (ii) Reference Method 2A of Appendix A to Part 60 shall be used to measure flow rates through pipes and small vents. (iii) The frequency of the flow rate measurements shall depend upon the variability of the effluent flow rate.

Radionuclides shall be directly monitored or extracted, collected, and measured using the following methods, or using EPA and CDPHE-approved alternative methodologies contained in the Proposal to Use Environmental Sampling for Demonstrating Compliance with 40 CFR 61, Subpart H, dated July 1997, and the 1998 Addendum: (i) Reference Method 1 of Appendix A to Part 60 shall be used to select monitoring of sampling sites. (ii) The effluent stream shall be directly monitored continuously with an in-line detector or representative samples of the effluent stream shall be withdrawn continuously from the sampling site following the guidance

presented in ANSI N13.1-1969 (1999). (iii) Radionuclides shall be collected and measured using procedures based on the principles of measurement described in Appendix B to Part 61, Method 114. (iv) A quality assurance program shall be conducted that meets the performance requirements described in Appendix B, Method 114.

(i) Radionuclide emission measurements shall be made at all release points which have a potential to discharge radionuclides into the air in quantities which could cause an EDE in excess of 1% of the standard. All radionuclides which could contribute greater than 10% of the potential EDE for a release point shall be measured. For other release points that have a potential to release radionuclides into the air, periodic confirmatory measurements shall be made to verify the low emissions. The ambient samplers at the perimeter of the Site and process knowledge for operations resident in those locations shall be used to verify low emissions, as outlined in the Proposal to Use Environmental Sampling for Demonstrating Compliance with 40 CFR 61, Subpart H, dated July 1997, and the 1998 Addendum. (ii) To determine whether a release point is subject to the emission measurement requirements it is necessary to evaluate the potential for radionuclide emissions for that release point. The estimated radionuclide release rates shall be based on the discharge of the effluent stream that would result if all pollution control equipment did not exist, but the facility's operations were otherwise normal.

### 6.3 Section 61.94

This section requires the submittal of an annual air emission report (covering the previous calendar year) to the EPA HQ, EPA Region VIII, and the Colorado Department of Public Health and Environment by June 30. Information in the report must meet the requirements of this section.

### 6.4 Section 61.95

This section requires that records documenting the source of input parameters including the results of all measurements upon which they are based, calculations, etc., be maintained for at least five years and, upon request, be made available for inspection by the Administrator or his authorized representative.

**SECTION III - Permit Shield**

Regulation No. 3, 5 CCR 1001-5, Part A, § I.B.43; Part C, §§ V.C.1.b. & D., XIII; §§ 25-7-111(2)(I), 25-7-114.4(3)(a), C.R.S.

**1. Specific Conditions**

The following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued:

Emission Unit Description & Number	Applicable Requirement	Justification
Facility	40CFR60 Subparts WWW and Cc adopted by reference in Colorado Regulation No. 6, Part A	The design capacities of the landfills at the Site are less than the 2.5 Mg threshold
Facility	40CFR60 Subparts D, Da, Db and Dc adopted by reference in Colorado Regulation No. 6, Part A	There are no affected facilities at the Rocky Flats Environmental Technology Site
Facility	40CFR60 Subparts K, Ka and Kb adopted by reference in Colorado Regulation No. 6, Part A	There are no affected facilities at the Rocky Flats Environmental Technology Site
Facility	40CFR63 (CAQCC Regulation No. 8, Part E)	The facility is not currently regulated under any MACT standard
Facility	40CFR61, Subpart C (CAQCC Regulation No. 8, Part A, Subpart C)	There are no applicable beryllium stationary source categories at the Rocky Flats Environmental Technology Site

**2. General Conditions**

Compliance with this Operating Permit shall be deemed compliance with all applicable requirements specifically identified in the permit and other requirements specifically identified in the permit as not applicable to the source. This permit shield shall not alter or affect the following:

2.1 The provisions of §§ 25-7-112 and 25-7-113, C.R.S., or § 303 of the federal act, concerning enforcement in cases of emergency;

2.2 The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;

2.3 The applicable requirements of the federal Acid Rain Program, consistent with § 408(a) of the federal act;

2.4 The ability of the Air Pollution Control Division to obtain information from a source pursuant to § 25-7-111(2)(I), C.R.S., or the ability of the Administrator to obtain information pursuant to § 114 of the federal act;

2.5 The ability of the Air Pollution Control Division to reopen the Operating Permit for cause pursuant to Regulation No. 3, Part C, § XIII.

2.6 Sources are not shielded from terms and conditions that become applicable to the source subsequent to permit issuance.

## SECTION IV - General Permit Conditions

### 1. Administrative Changes

#### Regulation No. 3, 5 CCR 1001-5, Part A, § III.

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.36.a. The permittee may immediately make the change upon submission of the application to the Division.

### 2. Certification Requirements

#### Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.9., V.C.16.a.&.e. and V.C.17.

- a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
- b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.
- c. Compliance certifications shall contain:
  - (i) the identification of each permit term and condition that is the basis of the certification;
  - (ii) the compliance status of the source;
  - (iii) whether compliance was continuous or intermittent;
  - (iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and
  - (v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.
- d. All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.
- e. If the permittee is required to develop and register a risk management plan pursuant to ' 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

### 3. Common Provisions

#### Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II.E., II.F., II.I. and II.J

- a. To Control Emissions Leaving Colorado  
When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.
- b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations. Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

- (i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;
- (ii) approves the use of an equivalent method;
- (iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or
- (iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7 1973, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

- (i) Sampling ports adequate for test methods applicable to such facility,
- (ii) Safe sampling platform(s),
- (iii) Safe access to sampling platform(s).
- (iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

Nothing in this section shall abrogate the Division's authority to conduct its own performance test(s) if so warranted.

d. Upset Conditions and Breakdowns

Upset conditions, as defined, shall not be deemed to be in violation of the Colorado regulations, provided that the Division is notified as soon as possible, but no later than two (2) hours after the start of the next working day, followed by a written notice to the Division explaining the cause of the occurrence and that proper action has been or is being taken to correct the conditions causing the violation and to prevent such excess emission in the future.

e. Circumvention Clause

A person shall not build, erect, install, or use any article, machine, equipment, condition, or any contrivance, the use of which, without resulting in a reduction in the total release of air pollutants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of this regulation. No person shall circumvent this regulation by using more openings than is considered normal practice by the industry or activity in question.

f. Compliance Certifications

For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in the Colorado State Implementation Plan, nothing in the Colorado State Implementation Plan shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed. Evidence that has the effect of making any relevant standard or permit term more stringent shall not be credible for proving a violation of the standard or permit term.

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

- (i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;
- (ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;
- (iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- (iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;
- (v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;
- (vi) All emissions monitoring systems were kept in operation (if at all possible);
- (vii) The owner or operator's actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

- (viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards (NSPS) or national emissions standards for hazardous air pollutants (NESHAPS), any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment

#### 4. Compliance Requirements

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.C.9., V.C.11. & 16.d., § 25-7-122.1(2), C.R.S.

- a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under ' 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.
- b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.
- c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in " X. and XI. of Regulation No. 3, Part C.
- d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

- e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.
- f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:
  - (i) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and
  - (ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.
- g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

**5. Emergency Provisions**

Regulation No. 3, 5 CCR 1001-5, Part C, § VII. and Common Provisions, 5 CCR 1001-2 § II.E

An emergency means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed the technology-based emission limitation under the permit due to unavoidable increases in emissions attributable to the emergency. "Emergency" does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. An emergency constitutes an affirmative defense to an enforcement action brought for noncompliance with a technology-based emission limitation if the permittee demonstrates, through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. the permitted facility was at the time being properly operated;
- c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

This emergency provision is in addition to any emergency or upset provision contained in any applicable requirement.

**6. Emission Standards for Asbestos**

Regulation No. 8, 5 CCR 1001-10, Part B

The permittee shall not conduct any asbestos abatement activities except in accordance with the provisions of Regulation No. 8, Part B, "emission standards for asbestos."

**7. Emissions Trading, Marketable Permits, Economic Incentives**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.13.

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 specifically provided for in the permit.

**8. Fee Payment**

C.R.S. §§ 25-7-114.1(6) and 25-7-114.7

- a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.
- b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.
- c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

**9. Fugitive Particulate Emissions**

Regulation No. 1, 5 CCR 1001-3, § III.D.1.

The permittee shall employ such control measures and operating procedures as are necessary to minimize fugitive particulate emissions into the atmosphere, in accordance with the provisions of Regulation No. 1, § III.D.1.

**10. Inspection and Entry**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.16.b.

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Air Pollution Control Division, or any authorized representative, to perform the following:

- a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;
- b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;
- c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;
- d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

**11. Minor Permit Modifications**

Regulation No. 3, 5 CCR 1001-5, Part C, §§ X. & XI.

The permittee shall submit an application for a minor permit modification before making the change requested in the application. The permit shield shall not extend to minor permit modifications.

**12. New Source Review**

Regulation No. 3, 5 CCR 1001-5, Part B

The permittee shall not commence construction or modification of a source required to be reviewed under the New Source Review provisions of Regulation No. 3, Part B, without first receiving a construction permit.

**13. No Property Rights Conveyed**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.11.d.

This permit does not convey any property rights of any sort, or any exclusive privilege.

**14. Odor**

Regulation No. 2, 5 CCR 1001-4, Part A

As a matter of state law only, the permittee shall comply with the provisions of Regulation No. 2 concerning odorous emissions.

**15. Off-Permit Changes to the Source**

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.B.

The permittee shall record any off-permit change to the source that causes the emissions of a regulated pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from the change, including any other data necessary to show compliance with applicable ambient air quality standards. The permittee shall provide contemporaneous notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permit shield shall not apply to any off-permit change.

**16. Opacity**

Regulation No. 1, 5 CCR 1001-3, §§ I., II.

The permittee shall comply with the opacity emissions limitation set forth in Regulation No. 1, §§ I.-II.

**17. Open Burning**

Regulation No. 1, 5 CCR 1001-3, §§ II.C.1.

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 1, §§ II.C.1.

**18. Ozone Depleting Compounds**

Regulation No. 15, 5 CCR 1001-17

The permittee shall comply with the provisions of Regulation No. 15 concerning emissions of ozone depleting compounds. Sections I., II.C., II.D., III. IV., and V. of Regulation No. 15 shall be enforced as a matter of state law only.

**19. Permit Expiration and Renewal**

Regulation No. 3, 5 CCR 1001-5, Part C, §§ III.B.6., IV.C., V.C.2.

- a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.
- b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

**20. Portable Sources**

Regulation No. 3, 5 CCR 1001-5, Part C, § II.D.

Portable Source permittees shall notify the Air Pollution Control Division at least 10 days in advance of each change in location.

**21. Prompt Deviation Reporting**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.7.b.

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Unless required by a permit term or condition to report deviations on a more frequent basis, "prompt" reporting shall entail submission of reports of deviations from permit requirements every six (6) months in accordance with paragraph 21.d. below. "Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

**22. Record Keeping and Reporting Requirements**

Regulation No. 3, 5 CCR 1001-5, Part A, § II.; Part C, §§ V.C.6., V.C.7.

- a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:
  - (i) date, place as defined in the Operating Permit, and time of sampling or measurements;
  - (ii) date(s) on which analyses were performed;
  - (iii) the company or entity that performed the analysis;
  - (iv) the analytical techniques or methods used;
  - (v) the results of such analysis; and
  - (vi) the operating conditions at the time of sampling or measurement.
- b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

- c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.
- d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the enhanced monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.
- e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, ' II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, ' II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

**23. Reopenings for Cause**

Regulation No. 3, 5 CCR 1001-5, Part C, § XIII.

- a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, ' III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.
- b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.
- c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.
- d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

**24. Section 502(b)(10) Changes**

Regulation No. 3, 5 CCR 1001-5, Part C, § XII.A.

The permittee shall provide a minimum 7-day advance notification to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit. The permittee shall attach a copy of each such notice given to its Operating Permit.

**25. Severability Clause**

Regulation No. 3, 5 CCR 1001-5, Part C, § V.C.10.

In the event of a challenge to any portion of the permit, all emissions limits, specific and general conditions, monitoring, record keeping and reporting requirements of the permit, except those being challenged, remain valid and enforceable.

**26. Significant Permit Modifications**

Regulation No. 3, 5 CCR 1001-5, Part C, § III.B.2.

The permittee shall not make a significant modification required to be reviewed under Regulation No. 3, Part B ("Construction Permit" requirements) without first receiving a construction permit. The permittee shall submit a complete Operating Permit application or application for an Operating Permit revision for any new or modified source within twelve months of commencing operation, to the address listed in Item 1 in Appendix D of this permit. If the permittee chooses to use the "Combined Construction/Operating Permit" application procedures of Regulation No. 3, Part C, then the Operating Permit must be received prior to commencing construction of the new or modified source.

**27. Special Provisions Concerning the Acid Rain Program**

Regulation No. 3, 5 CCR 1001-5, Part C, §§ V.C.1.b. & 8

- a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.
- b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

**28. Transfer or Assignment of Ownership**

Regulation No. 3, 5 CCR 1001-5, Part C, § II.C.

No transfer or assignment of ownership of the Operating Permit source will be effective unless the prospective owner or operator applies to the Air Pollution Control Division on Division-supplied Administrative Permit Amendment forms, for reissuance of the existing Operating Permit. No administrative permit shall be complete until a written agreement containing a specific date for transfer of permit, responsibility, coverage, and liability between the permittee and the prospective owner or operator has been submitted to the Division.

**29. Volatile Organic Compounds**

Regulation No. 7, 5 CCR 1001-9, §§ III & V.

- a. For sources located in an ozone non-attainment area or the Denver Metro Attainment Maintenance Area, all storage tank gauging devices, anti-rotation devices, accesses, seals, hatches, roof drainage systems, support structures, and pressure relief valves shall be maintained and operated to prevent detectable vapor loss except when opened, actuated, or used for necessary and proper activities (e.g. maintenance). Such opening, actuation, or use shall be limited so as to minimize vapor loss.

Detectable vapor loss shall be determined visually, by touch, by presence of odor, or using a portable hydrocarbon analyzer. When an analyzer is used, detectable vapor loss means a VOC concentration exceeding 10,000 ppm. Testing shall be conducted as in Regulation No. 7, Section VIII.C.3.

Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids,

transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

- b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

**30. Wood Stoves and Wood burning Appliances**

Regulation No. 4, 5 CCR 1001-6

The permittee shall comply with the provisions of Regulation No. 4 concerning the advertisement, sale, installation, and use of wood stoves and wood burning appliances.

## OPERATING PERMIT APPENDICES

- A - INSPECTION INFORMATION
- B - COMPLIANCE MONITORING REPORT FORMAT
- C - COMPLIANCE CERTIFICATION REPORT FORMAT
- D - NOTIFICATION ADDRESSES
- E - PERMIT ACRONYMS
- F - PERMIT MODIFICATIONS
- G - DIESEL FUEL EQUIPMENT LIST

**\*DISCLAIMER:**

None of the information found in these Appendices shall be considered to be State or Federally enforceable, except as otherwise provided in the permit, and is presented to assist the source, permitting authority, inspectors, and citizens.

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## APPENDIX A - Inspection Information

### Directions to Plant:

The facility is located north of Golden and to the east of Colorado Highway 93 and south of Colorado Highway 128.

### Safety Equipment Required:

Eye Protection	Dosimeter
Hard Hat	Respirator
Safety Shoes	Anti-Contamination Clothing
Hearing Protection	Building and Site Training
Gloves	

### Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on July 1, 1999 with the source's Title V Operating Permit Application.

### List of Insignificant Activities:

The following list of insignificant activities was provided by the source to assist in the understanding of the facility layout. Since there is no requirement to update such a list, activities may have changed since the last filing.

- Laboratories
- Research and Development Activities
- Fuel Burning Equipment less than or equal to 5 MMBtu/hr
- Chemical Storage Tanks and Areas
- Diesel Fuel and Fuel Oil Storage Tanks
- Fuel Burning Equipment less than or equal to 10 MMBtu/hr used for space heating

## APPENDIX B Reporting Requirements and Definitions

with codes ver 2/1/01

Please note that, pursuant to 113(c)(2) of the federal Clean Air Act, any person who knowingly:

- (A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);
- (B) fails to notify or report as required under the Act; or
- (C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

The permittee must comply with all conditions of this operating permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

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The Part 70 Operating Permit program requires three types of reports to be filed for all permits. All required reports must be certified by a responsible official.

### **Report #1: Monitoring Deviation Report** (due at least every six months)

*For purposes of this operating permit, the Division is requiring that the monitoring reports are due every six months unless otherwise noted in the permit. All instances of deviations from permit monitoring requirements must be clearly identified in such reports.*

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include, for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

**Report #2: Permit Deviation Report (must be reported “promptly”)**

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the permit is subject to deviation reporting. The reports must address deviations from permit requirements, including those attributable to upset conditions and malfunctions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

For purposes of this operating permit, “upset” shall refer to both emergency conditions and upsets. Additional discussion on these conditions is provided later in this Appendix.

*For purposes of this operating permit, the Division is requiring that the permit deviation reports are due every six months unless otherwise noted in the permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.*

In addition to the monitoring deviations discussed above, included in the meaning of deviation for the purposes of this operating permit are any of the following:

- (1) A situation where emissions exceed an emission limitation or standard contained in the permit;
- (2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;
- (3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,
- (4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report. All deviations shall be reported using the following codes:

- |                         |   |
|-------------------------|---|
| <b>1 = Standard:</b>    | When the requirement is an emission limit or standard |
| <b>2 = Process:</b>     | When the requirement is a production/process limit    |
| <b>3 = Monitor:</b>     | When the requirement is monitoring                    |
| <b>4 = Test:</b>        | When the requirement is testing                       |
| <b>5 = Maintenance:</b> | When required maintenance is not performed            |
| <b>6 = Record:</b>      | When the requirement is recordkeeping                 |
| <b>7 = Report:</b>      | When the requirement is reporting                     |

- 8 = CAM:** A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
- 9 = Other:** When the deviation is not covered by any of the above categories

**Report #3: Compliance Certification (annually, as defined in the permit)**

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually.

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each permit term and condition during the certification period and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.<sup>1</sup>
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

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<sup>1</sup> For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

Note the requirement that the certification shall identify each deviation and take it into account in the compliance certification. Previously submitted deviation reports, including the deviation report submitted at the time of the annual certification, may be referenced in the compliance certification.

## **Startup, Shutdown, Malfunctions, Emergencies, and Upsets**

Understanding the application of Startup, Shutdown, Malfunctions, Emergency provisions, and the Upset provisions is very important in both the deviation reports and the annual compliance certifications.

### **Startup, Shutdown, and Malfunctions**

Please note that exceedances of some New Source Performance Standards (NSPS) and Maximum Achievable Control Technology (MACT) standards that occur during Startup, Shutdown or Malfunctions may not be considered to be non-compliance since emission limits or standards often do not apply unless specifically stated in the NSPS. Such exceedances must, however, be reported as excess emissions per the NSPS/MACT rules and would still be noted in the deviation report. In regard to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

### **Emergencies and Upsets**

Under the Emergency provisions of Part 70 and the Upset provisions of the State regulations, certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

### **DEFINITIONS**

**Malfunction** (NSPS) means any sudden, infrequent, and not reasonably preventable failure of air pollution control equipment, process equipment, or a process to operate in a normal or usual manner. Failures that are caused in part by poor maintenance or careless operation are not malfunctions.

**Malfunction** (SIP) means any sudden and unavoidable failure of air pollution control equipment or process equipment or unintended failure of a process to operate in a normal or usual manner. Failures that are primarily caused by poor maintenance, careless operation, or any other preventable upset condition or preventable equipment breakdown shall not be considered malfunctions.

**Emergency** means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

**Upset** means an unpredictable failure of air pollution control or process equipment which results in the violation of emission control regulations and which is not due to poor maintenance, improper or careless operations, or is otherwise preventable through exercise of reasonable care.

**APPENDIX B: Monitoring and Permit Deviation Report - Part I**

- Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division on a semi-annual basis unless otherwise noted in the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.
- Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Rocky Flats Environmental Technology Site

OPERATING PERMIT NO: 96OPJE124

REPORTING PERIOD: \_\_\_\_\_ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period? <sup>1</sup>		Deviation Code <sup>2</sup>	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
F002	Building 219, Existing Landfill					
P003	Gasoline Storage and Dispensing Facility					
B004	Keeler Model NB4171 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-4					
B005	Keeler Model NB4172 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-5					
B006	Erie City Model Keystone Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 97913					
B007	Combustion Engineering Model 10B11047 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 85173					
P008	Thermal Research Model 7028SC Spray Dryer Serial Number 630					
P010	Diesel Fuel Equipment					
General Conditions						
Insignificant Activities						

<sup>1</sup> See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

<sup>2</sup>

**1 = Standard:** When the requirement is an emission limit or standard

- 
- 2 = Process:** When the requirement is a production/process limit  
**3 = Monitor:** When the requirement is monitoring  
**4 = Test:** When the requirement is testing  
**5 = Maintenance:** When required maintenance is not performed  
**6 = Record:** When the requirement is recordkeeping  
**7 = Report:** When the requirement is reporting  
**8 = CAM:** A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.  
**9 = Other:** When the deviation is not covered by any of the above categories





**APPENDIX B: Monitoring and Permit Deviation Report - Part III**

**REPORT CERTIFICATION**

SOURCE NAME: Rocky Flats Environmental Technology Site

FACILITY IDENTIFICATION NUMBER: 0590003

PERMIT NUMBER: 96OPJE124

REPORTING PERIOD: \_\_\_\_\_ (see first page of the permit for specific reporting period and dates)

All information for the Title V Semi-Annual Deviation Reports must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.54. This signed certification document must be packaged with the documents being submitted.

**STATEMENT OF COMPLETENESS**

**I have reviewed the information being submitted in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this submittal are true, accurate and complete.**

**Please note that the Colorado Statutes state that any person who knowingly, as defined in Sub-Section 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of Sub-Section 25-7 122.1, C.R.S.**

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Printed or Typed Name

Title

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Signature of Responsible Official

Date Signed

**Note: Deviation reports shall be submitted to the Division at the address given in Appendix D of this permit. No copies need be sent to the U.S. EPA.**

**APPENDIX C**  
**Required Format for Annual Compliance Certification Report**

Following is the format for the Compliance Certification report to be submitted to the Division and the U.S. EPA annually based on the effective date of the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

FACILITY NAME: Rocky Flats Environmental Technology Site  
 OPERATING PERMIT NO: 96OPJE124  
 REPORTING PERIOD:

I. Facility Status

\_\_\_ During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the Permit.

\_\_\_ With the possible exception of the deviations identified in the table below, this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, during the entire reporting period. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s). Note that not all deviations are considered violations.

Operating Permit Unit ID	Unit Description	Deviations Reported <sup>1</sup>		Monitoring Method per Permit? <sup>2</sup>		Was compliance continuous or intermittent? <sup>3</sup>		Was Data Continuous? <sup>4</sup>	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
F002	Building 219, Existing Landfill								
P003	Gasoline Storage and Dispensing Facility								
B004	Keeler Model NB4171 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-4								
B005	Keeler Model NB4172 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 14271-5								
B006	Erie City Model Keystone Dual Fuel								

Operating Permit Unit ID	Unit Description	Deviations Reported <sup>1</sup>		Monitoring Method per Permit? <sup>2</sup>		Was compliance continuous or intermittent? <sup>3</sup>		Was Data Continuous? <sup>4</sup>	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
	Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 97913								
B007	Combustion Engineering Model 10B11047 Dual Fuel Fired Boiler, Rated at 100 MMBtu/hr, Serial Number 85173								
P008	Thermal Research Model 7028SC Spray Dryer Serial Number 630								
P010	Diesel Fuel Equipment								
General Conditions									
Insignificant Activities <sup>5</sup>									

<sup>1</sup> If deviations were noted in the previous deviation report (i.e. for the first six months of the annual reporting period), put an “X” under “previous”. If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an “X” under “current”. Mark both columns if both apply.

<sup>2</sup> Note whether the method(s) used to determine the compliance status with each term and condition was the method(s) specified in the permit. If it was not, mark “no” and attach additional information/explanation.

<sup>3</sup> Note whether the compliance status with of each term and condition provided was continuous or intermittent. Intermittent Compliance” can mean either that noncompliance has occurred or that the owner or operator has data sufficient to certify compliance only on an intermittent basis. Certification of intermittent compliance therefore does not necessarily mean that any noncompliance has occurred.

NOTE:

The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and recordkeeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and recordkeeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

<sup>4</sup> Note whether the method(s) used to determine the compliance status with each term and condition provided continuous or intermittent data.

<sup>5</sup> Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II. Status for Accidental Release Prevention Program:

- A. This facility \_\_\_\_\_ is subject \_\_\_\_\_ is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act)
- B. If subject: The facility \_\_\_\_\_ is \_\_\_\_\_ is not in compliance with all the requirements of section 112(r).
1. A Risk Management Plan \_\_\_\_\_ will be \_\_\_\_\_ has been submitted to the appropriate authority and/or the designated central location by the required date.

III. Certification

**I have reviewed this certification in its entirety and, based on information and belief formed after reasonable inquiry, I certify that the statements and information contained in this certification are true, accurate and complete.**

**Please note that the Colorado Statutes state that any person who knowingly, as defined in § 18-1-501(6), C.R.S., makes any false material statement, representation, or certification in this document is guilty of a misdemeanor and may be punished in accordance with the provisions of § 25-7 122.1, C.R.S.**

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Printed or Typed Name

Title

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Signature

Date Signed

**NOTE:** All compliance certifications shall be submitted to the Air Pollution Control Division and to the Environmental Protection Agency at the addresses listed in Appendix D of this Permit.

**APPENDIX D**  
**Notification Addresses**

**1. Air Pollution Control Division**

Colorado Department of Public Health and Environment  
Air Pollution Control Division  
Operating Permits Unit  
APCD-SS-B1  
4300 Cherry Creek Drive S.  
Denver, CO 80246-1530

ATTN: Jim King

**2. United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice  
Mail Code 8ENF  
U.S. Environmental Protection Agency, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Pollution Prevention, State and Tribal Programs  
Air Program, 8P-AR  
U.S. Environmental Protection Agency, Region VIII  
999 18th Street, Suite 300  
Denver, CO 80202

**APPENDIX E**  
**Permit Acronyms**

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr

PE -	Particulate Emissions
PM -	Particulate Matter
PM <sub>10</sub> -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO <sub>2</sub> -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds



**APPENDIX G**  
**Diesel Fuel Equipment List**

<u>Building</u>	<u>Description</u>	<u>Serial No.</u>	<u>Horsepower</u>
112	Caterpillar 3406B DI	2WB10040	475
120	Generac D802120	EH70066261	100
124	Cummins NT400	409713	336
127	Caterpillar 3408	67U2270	410
115	Caterpillar 3406B DI	2WB08975	475
331	Davey 3306	66D9160	236
331	Ingersoll Rand 750	34617764	275
331	Ingersoll Rand 750	34682103	275
331	Ingersoll Rand 750	34682095	275
371	Detroit Diesel 40501RB	ASP434	4500
372A (PACS-2)	Generac 88A02361-S	W04DA020737	107
427	Caterpillar 3412	81Z01961	908
443	Caterpillar D348	36J1996	710
443	Detroit Diesel 16V92T	5139650ND11	710
559	Caterpillar D353	46B2195	405
562	Detroit Diesel V1671T	16VA7423	825
566	Cummins DMT175CA	88341-1	264
662 Portable A	Caterpillar 3516	25Z00543	1877
662 Portable B	Caterpillar 3412	81Z4296	675
708A	GM EMD 12645E1	69A11015	1500
708B	Caterpillar 3412	81Z05345	749
708C	Caterpillar 3208	30A01201	194
711A	Allis Chalmers 1700	1701770	350
715	Detroit Diesel V12149	12E0001804	1300
716	Caterpillar 3512	3YF00358	1904
762A (PACS-1)	Generac 88A02395-S	EH700186589	107
776	Caterpillar 3512	24Z01011	1300
Telecon Hut	Cummins 6BT5.9-G6	46043016	150
792A (PACS-3)	Generac 88A02361-S	W04DA020738	67
827	Caterpillar D348	36J386	805
881G	Caterpillar 3516	25Z00696	2022
881G	Caterpillar D348	36J1999	710
920	Generac D802120	EH70066252	100
928	Cummins NT855F2	10489140	340
989	Caterpillar D343	62B11442	425
995	John Deere CD4039	ND109658	95

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995	Caterpillar 3406B DI	2WB08984	475
331	Detroit Diesel 10637305	06A0468687	330
331	Detroit Diesel 80837416	8VF153015	643