Colorado Department of Public Health and Environment

OPERATING PERMIT

COLORADO INTERSTATE GAS - LATIGO STATION

First Issued: November 1, 1998

Renewed: July 1, 2005

Last Revised: August 29, 2008

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Latigo Compressor Station	OPERATING PERMIT NUMBER
FACILITY ID:	0050055	**95OPAR037**
RENEWED:	July 1, 2005	
EXPIRATION DATE:	July 1, 2010	
MODIFICATIONS:	See Appendix F of Permit	

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

ISSUED TO:

Colorado Interstate Gas Company
2 North Nevada
Colorado Springs, CO 80903

PLANT SITE LOCATION:

NE Corner, Section 23, T5S, R61W
(~ 7.5 miles SE of Byers)
Arapahoe County, CO

INFORMATION RELIED UPON
Operating Permit Renewal Application
Received: November 4, 2002
And Additional Information Received: November 21, 2002 and November 29, 2004

Nature of Business: Natural Gas Processing
Primary SIC: 1321

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SUBMITTAL DEADLINES

Semi-Annual Monitoring Period:	July 1 – December 31, January 1 – June 30
Semi-Annual Monitoring Report:	Due February 1, 2006 & August 1, 2006 & subsequent years
First Annual Compliance Period:	July 1 – December 31
Subsequent Annual Compliance Periods:	January 1 – December 31
Annual Compliance Certification:	Due on February 1, 2006 and subsequent years

Note that the Semi-Annual Monitoring Reports and Annual Compliance Certifications must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports/certifications.

TABLE OF CONTENTS:

SECTION I - General Activities and Summary 1
1. Permitted Activities 1
2. Alternative Operating Scenarios 2
3. Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD) 2
4. Accidental Release Prevention Program (112(r)) 2
5. Compliance Assurance Monitoring (CAM) 3
6. Summary of Emission Units 3
7. Compliance Schedule 4

SECTION II - Specific Permit Terms 5
1. E001 - E003 Superior 8GTL-825 Internal Combustion Engines 5
2. E004 - Superior 8GTL-825 Internal Combustion Engine 7
3. E005, E006 - Superior 6G510 Internal Combustion Engines 8
4. D001 - Olman Heath Glycol Dehydration Unit 9
5. F001 - Fugitive Emissions of Volatile Organic Compounds from Equipment Leaks 12
6. Condensate Truck Loading 13

SECTION III - Permit Shield 15
1. Specific Non-Applicable Requirements 15
2. General Conditions 16
3. Streamlined Conditions 16

SECTION IV - General Permit Conditions 17
1. Administrative Changes 17
2. Certification Requirements 17
3. Common Provisions 17
4. Compliance Requirements 21
5. Emergency Provisions 22
6. Emission Standards for Asbestos 22
7. Emissions Trading, Marketable Permits, Economic Incentives 22
8. Fee Payment 23
9. Fugitive Particulate Emissions 23
10. Inspection and Entry 23
11. Minor Permit Modifications 23
12. New Source Review 23
13. No Property Rights Conveyed 24
14. Odor 24
15. Off-Permit Changes to the Source 24
16. Opacity 24
17. Open Burning 24
18. Ozone Depleting Compounds 24
19. Permit Expiration and Renewal 24
20. Portable Sources 25
21. Prompt Deviation Reporting 25
22. Record Keeping and Reporting Requirements 25
23. Reopenings for Cause 26
24. Section 502(b)(10) Changes 27

TABLE OF CONTENTS:

25. Severability Clause 27
26. Significant Permit Modifications 27
27. Special Provisions Concerning the Acid Rain Program 27
28. Transfer or Assignment of Ownership 27
29. Volatile Organic Compounds 28
30. Wood Stoves and Wood burning Appliances 28

APPENDIX A - Inspection Information 1
Directions to Plant: 1
Safety Equipment Required: 1
Facility Plot Plan: 1
List of Insignificant Activities: 1

APPENDIX B 1
Reporting Requirements and Definitions 1

Startup, Shutdown, Malfunctions and Emergencies 3
Monitoring and Permit Deviation Report - Part I 5
Monitoring and Permit Deviation Report - Part II 7
Monitoring and Permit Deviation Report - Part III 9

APPENDIX C 1
Required Format for Annual Compliance Certification Reports 1

APPENDIX D 1
Notification Addresses 1

APPENDIX E 1
Permit Acronyms 1

APPENDIX F 1
Permit Modifications 1

SECTION I - General Activities and Summary

1. Permitted Activities

1.1 The primary function of this facility is to compress and store pipeline-quality gas in storage wells during an injection phase, and processing, conditioning and compressing this gas back to the sales pipeline during a withdrawal phase. The plant has a maximum injection capacity of 70 MMscfd and maximum withdrawal rate of 110 MMscfd.

During gas injection, pipeline quality gas enters the facility and is compressed to 2130 psig. The compressor units are powered by natural gas fired internal combustion engines. After compression, the gas is cooled and directed to a filter separator to remove entrained oils. The gas is then discharged to one or more of 26 injection/withdrawal wells.

During gas withdrawal, the wellstream goes through several processing steps to separate gas, liquid and hydrocarbon phases. An ethylene glycol dehydrator is used to separate water from the gas stream. Hydrocarbon liquids collected from each stage are stored and then sold off site for refining. The glycol/water mix is sent to a glycol still where the water is boiled off and the glycol is regenerated for further use. Gas is compressed, if necessary, and directed to sales pipelines.

The facility is located in a flat, rural area approximately 7.5 miles southeast of Byers, CO. This facility is located in an area classified as attainment for all pollutants except ozone. It is classified as non-attainment for ozone and is part of the 8-hr Ozone Control Area as defined in Regulation No. 7, Section II.A.16.

There are no affected states within 50 miles of the plant. There are no Federal Class I designated areas within 100 kilometers of the plant.

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 The 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 permit incorporates the applicable requirements (except as noted in Section II) from the following construction permits: 11AR392, 95AR109, and 10AR981.

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 3.d, 3g (last paragraph), 14 and 18 (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 22 of the General Conditions in Section IV of this permit.

2. Alternative Operating Scenarios

2.1 The permittee shall be allowed to make the following changes to its method of operation without applying for a revision of this permit.

No separate operating scenarios have been specified.

3. Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD)

3.1 This facility is categorized as a PSD major stationary source (potential to emit of $NO_X \geq 250$ tons/year). Future modifications at this facility resulting in a significant net emissions increase (see Colorado Regulation No. 3, Part D, Sections II.B.26 and 42) or a modification which is major by itself (Potential to Emit $\geq$ 250 tons/year) for any pollutant listed in Colorado Regulation 3, Part D, Section II.A.42 for which the area is in attainment or attainment/maintenance may result in the application of the PSD review requirements.

3.2 This source is categorized as a NANSR major stationary source (Potential to Emit of $NO_X \geq 100$ tons/year). Future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part D, Sections II.A.26 and 42) for VOC or NO_X or a modification which is major by itself (Potential to Emit $\geq$ 100 tons/year of either VOC or NO_X) may result in the application of the NANSR review requirements.

3.3 There are no other Operating Permits associated with this facility for purposes of determining applicability of NANSR and PSD review regulations.

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

4.1 Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. Compliance Assurance Monitoring (CAM)

5.1 The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV:

None

6. Summary of Emission Units

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

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
E001-E003	001	S001-S003	Superior Model 8GTL-825 1069 HP Internal Combustion Engines, 4-Cycle Lean Burn, Serial Nos. 265989, 265999, and 266009. Natural Gas Fired.	Uncontrolled
E004	011	S004	Superior Model 8GTL-825 963 HP Internal Combustion Engine, 4-Cycle Lean Burn, Serial No. 273579, Natural Gas Fired.	Uncontrolled
E005	004	S005	Superior Model 6G510 400 HP Internal Combustion Engine, 4 Cycle Rich Burn, Serial No. 271549, Natural Gas Fired.	Uncontrolled
E006	004	S006	Superior Model 6G510 400 HP Internal Combustion Engine, 4 Cycle Rich Burn, Serial No. 264179, Natural Gas Fired.	Uncontrolled
D001	010	S007	Olman Heath Model 2205G 140 MMscfd Glycol Dehydration Unit, Serial No. 23596. Equipped with Flash Tank	Uncontrolled
F001	012	S008	Fugitive Volatile Organic Compound Emissions from Equipment Leaks.	Uncontrolled
M001	013	S009	Condensate Truck Loading	Uncontrolled

7. Compliance Schedule

In order to address potential violations of the NO_2 National and Colorado Ambient Air Quality Standards (NAAQS and CAAQS) discovered during the modeling analysis conducted for the increase in the NO_X emission limitations, the permittee shall take the following actions:

7.1 The stack heights for existing engines shall be increased as follows:

7.1.1 For units CG-1 through CG-4 (E001 through E004) the stacks will be raised to 12 meters (~ 39 feet, 4 inches).

7.1.2 For units CG-6 and CG-7 (E005 and E006) the stacks will be raised to 10 meters (~ 32 feet 9 inches).

The revisions to the engine stack heights will be completed by February 1, 2007.

SECTION II - Specific Permit Terms

1. E001 - E003 Superior 8GTL-825 Internal Combustion Engines

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NO_X	1.1	N/A	149 tons/yr	4.08 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	20.2 tons/yr	0.557 lb/MMBtu		
VOC		N/A	4.3 tons/yr	0.118 lb/MMBtu		
Natural Gas Consumption	1.2	N/A	76.53 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	1.3	Not to Exceed 20 %		N/A	Fuel Restriction	Only Natural Gas is Used as Fuel
BTU Content of Natural Gas	1.4	N/A		N/A	ASTM Methods or In-Line Gas Chromatograph	Semi-Annually
Oxygen Concentration in Exhaust Gas	1.5.	2% by volume or greater		N/A	Oxygen Monitoring Device	Continuously

1.1 Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compound emissions **from each engine** shall not exceed the limitations stated above (Colorado Construction Permit 10AR981, as modified under the provisions of Section I, Condition 1.3 to revise emissions as indicated on the APEN submitted on February 2, 2006). The emission factors listed above (AP-42, Section 3.2, dated July 2000, Table 3.2-2) have been approved by the Division and shall be used to calculate emissions from these engines. Monthly emissions shall be calculated by the end of the subsequent month using the above emission factors, the monthly natural gas consumption and the lower heating value of the fuel in the equation below:

$$\text{tons/mo} = \frac{\text{EF (lbs/MMBtu) x fuel use (MMSCF/mo) x lower heating value of fuel (MMBtu/MMSCF)}}{\text{2000 lbs/ton}}$$

Monthly emissions from each engine shall be used in a twelve month rolling total to monitor compliance with the annual emission limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

1.2 Natural gas consumption **for each engine** shall not exceed the limitations listed above (Colorado Construction Permit 10AR981, as modified under the provisions of Section I, Condition 1.3 to remove the short-term (hourly) natural gas consumption limit). Natural gas use shall be recorded monthly using the facility fuel meter. Natural gas consumption for each engine shall be allocated according to size, hours of operation and other records as necessary and recorded in a

log to be made available to the Division upon request. A twelve month rolling total shall be maintained to monitor compliance with the annual limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.

1.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section II.A.1). The opacity standard applies **to each engine**. In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for these engines.

1.4 The Btu content of the natural gas used to fuel these engines shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. In lieu of collecting a sample, the Btu content of the natural gas may be determined using the in-line gas chromatograph to determine the gas composition and the appropriate ASTM Methods or equivalent, if approved in advance by the Division, to calculate the Btu content. The Btu content of the gas shall be calculated for January and July, using the average composition of the gas as determined by the in-line gas chromatograph for those months. The Btu content of the natural gas shall be based on the lower heating value of the fuel.

If sampling is conducted, calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis. If the gas chromatograph data is used, calculations of monthly emissions for January through June shall be made using the January average Btu content and calculations of monthly emissions for July through December shall be made using the July average Btu content.

1.5 The oxygen concentration in the exhaust **of each engine** shall be 2% by volume or greater. Each engine exhaust shall be equipped with a monitoring device to continuously monitor the oxygen concentration in the exhaust. Each device shall be equipped with a recorder and/or alarm that indicates anytime the oxygen content falls below 2%. The monitoring device shall be installed and operational within sixty (60) days of revised permit issuance [January 30, 2007]. In the event that the oxygen content falls below 2% oxygen by volume the engine no longer meets the definition of a lean burn engine as provided for in Colorado Regulation No. 7, Section XVI.B.2 and is considered a rich burn engine and is subject to the control requirements in Colorado Regulation No. 7, Section XVI.B.1. The permittee shall submit an application to modify this permit within 30 days of the date when the oxygen concentration in the exhaust falls below 2% by volume to include the control requirements in Colorado Regulation No. 7, Section XVI.B.1.

1.6 These engines shall be operated and maintained in accordance with manufacturer's recommendations at all times, including periods of start-up, shutdown, and malfunction.

2. E004 - Superior 8GTL-825 Internal Combustion Engine

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NO_X	2.1	N/A	N/A	14.4 grams/hp-hr	Calculation	Annually
CO				1.97 grams/hp-hr		
VOC				0.42 grams/hp-hr		
Hours of Operation	2.2	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	2.3	Not to Exceed 20%		N/A	Fuel Restriction	Only Natural Gas is Used as Fuel
Oxygen Concentration in Exhaust Gas	2.4.	2% by volume or greater		N/A	Oxygen Monitoring Device	Continuously

2.1 The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this engine (AP-42, Section 3.2, dated July 2000, Table 3.2-2, converted to g/hp-hr based on an engine heat rate of 7800 Btu/hp-hr). Annual emissions for the purposes of APEN reporting and the payment of annual fees shall be calculated using the above emission factors, the maximum site rated horsepower and the hours of operation, as required by Condition 2.2, in the following equation:

$$\text{Tons/yr} = \frac{\text{EF (g/hp-hr) x hours of operation (hrs/yr) x maximum site rated hp}}{\text{(453.6 g/lb) x (2000 lbs/ton)}}$$

2.2 Hours of Operation shall be monitored monthly and recorded in a log to be made available to the Division upon request. Recorded data shall be used to allocate fuel as required by Condition 1.2 and to calculate annual emissions as specified in Condition 2.1.

2.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (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 since only natural gas is permitted to be used as fuel for this engine. The permittee shall maintain records that verify that only natural gas is used as fuel in this engine.

2.4 The oxygen concentration in the exhaust of this engine shall be 2% by volume or greater. The engine exhaust shall be equipped with a monitoring device to continuously monitor the oxygen concentration in the exhaust. The device shall be equipped with a recorder and/or alarm that indicates anytime the oxygen content falls below 2%. The monitoring device shall be installed and operational within sixty (60) days of revised permit issuance [January 30, 2007]. In the event that the oxygen content falls below 2% oxygen by volume the engine no longer meets the definition of a lean burn engine as provided for in Colorado Regulation No. 7, Section XVI.B.2

and is considered a rich burn engine and is subject to the control requirements in Colorado Regulation No. 7, Section XVI.B.1. The permittee shall submit an application to modify this permit within 30 days of the date when the oxygen concentration in the exhaust falls below 2% by volume to include the control requirements in Colorado Regulation No. 7, Section XVI.B.1.

3. E005, E006 - Superior 6G510 Internal Combustion Engines

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NO_X	3.1	N/A	N/A	7.7 grams/hp-hr	Calculation	Annually
CO				12.7 grams/hp-hr		
VOC				0.1 grams/hp-hr		
Hours of Operation	3.2	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	3.3	Not to Exceed 20%		N/A	Fuel Restriction	Only Natural Gas is Used as Fuel

3.1 The emission factors listed above have been approved by the Division and shall be used to calculate emissions **from each engine** (AP-42, Section 3.2, dated July 2000, Table 3.2-3, converted to g/hp-hr based on an engine heat rate of 7514 Btu/hp-hr). Annual emissions for the purposes of APEN reporting and the payment of annual fees shall be calculated using the above emission factors, the maximum site rated horsepower and the hours of operation, as required by Condition 3.2, in the following equation:

$$\text{Tons/yr} = \frac{\text{EF (g/hp-hr) x hours of operation (hrs/yr) x maximum site rated hp}}{\text{(453.6 g/lb) x (2000 lbs/ton)}}$$

3.2 Hours of Operation, **for each engine**, shall be monitored annually and recorded in a log to be made available to the Division upon request. Recorded data shall be used to allocate fuel as required by Condition 1.2 and to calculate annual emissions as specified in Condition 3.1.

3.3 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant which is in excess of 20% opacity (Colorado Regulation No. 1, Section II.A.1). The opacity standard applies **to each engine**. In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since only natural gas is permitted to be used as fuel for these engines. The permittee shall maintain records that verify that only natural gas is used as fuel in these engines.

4. D001 - Olman Heath Glycol Dehydration Unit

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	4.1	N/A	9 tons/yr	Based on Input to GLYCalc Model	Parametric Monitoring	See Condition 4.1.
Individual HAP		N/A	4 tons/yr			
Combined HAPs		N/A	14 tons/yr			
Extended Gas Analysis		N/A	N/A	N/A	ASTM Methods	Annually
Gas Processed	4.2.	N/A	17,500 MMscf/yr	N/A	Flow Meter	Monthly
Hours of Operation	4.3.	N/A	3,000 hrs/yr	N/A	Recordkeeping	Monthly

4.1 Total VOC, Individual HAP and Total Combined HAP emissions from the ethylene glycol dehydrator at this site shall not exceed the limitations stated above (Colorado Construction Permit 11AR392, as modified (per Worst Case Dehydrator Emissions submitted 11/29/04 by CIG) under the provisions of Section I, Condition 1.3). Compliance with the VOC and HAP emission limits shall be monitored in accordance with the comparison criteria stipulated below (from "worst case" GlyCalc evaluation submitted to the Division on November 29, 2004).

Parameter	Value	Units	Criteria	Frequency
Cold Separator Temperature	3	º F	At or Above	Daily
Cold Separator Pressure	840	psig	At or Above	Daily
Benzene Content of Gas	30	ppm	At or Below	Annually
Toluene Content of Gas	30	ppm	At or Below	Annually
Ethyl Benzene Content of Gas	10	ppm	At or Below	Annually
Xylene Content of Gas	10	ppm	At or Below	Annually
n-Hexane	250	ppm	At or Below	Annually

4.1.1 The cold separator temperature and pressure for the unit shall be measured and recorded daily. If any daily cold separator temperature or pressure for the month does not meet the comparison criteria, an average value for that parameter shall be calculated for the month. The circumstances surrounding any day on which the cold separator temperature and pressure values fail to be measured and recorded shall be described in a log to be maintained on site. Data from the last day for which data exists will be substituted for the missing values for purposes of calculating the monthly average. No data substitution is necessary for days on which the units did not operate.

4.1.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C_1 to C_6, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition annually. If any of the analyses indicates the BTEX constituents exceed the listed values, frequency of extended gas analyses will increase to twice per recovery period (analyses not less than one months apart). Frequency will remain twice per recovery period until analyses indicates the BTEX constituents meet the comparison criteria for two consecutive tests, at which time required frequency will return to annual.

4.1.3 If either a monthly average cold separator temperature, a monthly average cold separator pressure or a concentration for a BTEX constituent do not meet the stipulated comparison criteria, the GRI GlyCalc (Version 4.0 or higher) model shall be used to determine the monthly VOC and HAP emission rates, unless the unit has been operated for 240 hours or less. Inputs to the model shall be the recorded average values for cold separator temperature and pressure, gas data from the most recent required analysis (see Condition 4.1.2), and the following assumed values (Worst Case Dehydrator Emissions submitted 11/29/04 by CIG):

Inlet (Wet) Gas Temperature:	85 º F
Inlet (Wet) Gas Pressure:	890 psig
Natural Gas Throughput:	140 MMscf/day
Glycol Circulation Rate	10 gal/min
Flash Tank Temperature	75 º F
Flash Tank Pressure	275 psig

GLYCalc model runs shall be conducted for the month(s) in which the monthly average value of a GLYCalc parameter recorded daily was exceeded and for every month in which any BTEX constituent exceeds the values listed in Condition 4.1, beginning with the month in which the gas sample was taken which indicates the exceedance and ending in the month in which a gas sample is taken that indicates no exceedance. GLYCalc model runs shall be completed by the end of the subsequent month.

4.1.4 Monthly emissions of ethylene glycol shall be determined using the hours of operation (as required by Condition 4.3) in the following equation:

$$\text{Tons/mo} = \frac{\text{EF (lbs/hr) x hours of operation (hrs/mo)}}{\text{2000 lbs/ton}}$$

Where EF = 0.7 lbs/hr (from March 9, 2006 performance test)

Monthly emissions of ethylene glycol shall be used in the rolling twelve month totals for single and combined HAP emissions required by Condition 4.1.5.

4.1.5 A rolling twelve month total of VOC, single HAP and combined HAP emissions shall be maintained for the unit to monitor compliance with the annual VOC, single HAP and combined HAP limits.

For any twelve month period for which no GLYCalc runs were triggered and ethylene glycol emissions are less than 4 tons, the twelve month rolling total of VOC, single HAP and combined HAP emissions may be assumed to be equal to the annual VOC, single HAP and combined HAP limits.

The calculation of the twelve month rolling total of VOC, single HAP and combined HAP emissions shall be performed for any month a GLYCalc run is triggered. The monthly VOC, single HAP and combined HAP emissions used in the rolling twelve month total for months that do not trigger a GLYCalc run shall be calculated using hours of operation, as required by Condition 4.3., and the following emission factors (from Worst Case Dehydrator Emissions submitted 11/29/04 by CIG):

Component	Emission Factor
VOC	5.16 lbs/hr
n-Hexane	0.10 lbs/hr
Benzene	0.79 lbs/hr
Toluene	1.37 lbs/hr
Ethylbenzene	0.44 lbs/hr
Xylene	0.77 lbs/hr
Ethylene Glycol	Emissions Determined by Condition 4.1.4

If the twelve month rolling total of VOC, single HAP and combined HAP emissions exceeds the annual VOC, single HAP and combined HAPS emission limits, VOC, single HAP and combined HAP emissions must be calculated with GLYCalc using the parameters described in Condition 4.1.3 until the rolling twelve month total is in compliance with the annual VOC, single HAP and combined HAP limitations.

4.2 The total cubic feet of gas processed by the ethylene glycol dehydrator shall not exceed the limitations listed above (Colorado Construction Permit 11AR392, as modified (per letter to Division, received May 22, 1997) under the provisions of Section I, Condition 1.3). The gas throughput to the dehydration unit shall be recorded monthly using existing flow meters. A twelve month rolling total will be maintained to monitor compliance with annual limitation.

4.3 Hours of Operation for the unit shall not exceed the limitations listed above (Colorado Construction Permit 11AR392, as modified (per letter to Division, received May 22, 1997) under the provisions of Section I, Condition 1.3). Hours of Operation shall be monitored and recorded monthly in a log that is available to the Division upon request. A twelve month rolling total will be maintained to monitor compliance with annual limitations.

5. F001 - Fugitive Emissions of Volatile Organic Compounds from Equipment Leaks

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	5.1, 5.2.	N/A	6.4 tons/year	By Component - EPA Protocol for Equipment Leak Emission Estimates	Recordkeeping	Initial Component Count, Ongoing Tally

5.1 VOC emissions from equipment leaks shall not exceed the limitation stated above (Colorado Construction Permit 95AR109, as modified under the provisions of Section I, Condition 1.3 to remove short term emission limits). Emissions shall be calculated using the emission factors and equations listed below. Emission Factors (EF) for individual types of components in lb/component-hr (EPA-453/R-95-017, "EPA's Protocol for Equipment Leak Emission Estimates", Table 2.4, November 1995):

Valves = 0.0099
Connectors = 0.0044
Pump Seals = 0.00529
Flanges = 0.000859
Open-ended Lines = 0.0044
Other* = 0.0194

*Other should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps or valves

Annual Emissions of VOC per Component type:

(Component Count) X (8760 hrs/year) X (Weight % VOC in Gas Stream) X (Emission Factor for Component Type)

Total Fugitive VOC emissions will be the sum of emissions for each component.

The most recent gas analysis as required under Condition 4.1.2 of this permit shall be used to determine the appropriate weight % VOC to use in the above equation.

Records shall be kept of all component additions and deletions, and a running tally maintained. A physical hard-count of facility components shall be conducted every five years. Note that according to the Division's August 17, 2004 inspection report a physical hard count was conducted in May 2004.

5.2 A Maintenance Plan shall be developed and implemented that outlines the procedures necessary to locate and repair equipment leaks to minimize the loss of Fugitive Volatile Organic Compounds. The Maintenance Plan shall be kept on site and made available for Division inspection.

6. Condensate Truck Loading

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC Emissions	6.1.	N/A	N/A	API E & P Tanks Version 2.0 or Higher and AP-42	Calculation	Annually
E & P Tanks Input Parameters	6.2.	N/A	N/A	N/A	Recordkeeping and Analysis	Monthly (Records) Annually (Analysis)
Condensate Unloaded	6.3.	N/A	N/A	N/A	Recordkeeping	Monthly
Sales Condensate Analysis	6.4	N/A	N/A	N/A	Analytical Methods	Annually

6.1 Annual (calendar year) emissions for purposes of APEN reporting and payment of annual fees shall be calculated for the condensate loading equipment as follows:

6.1.1 Emissions from flashing shall be determined annually using API's E & P Tanks Version 2.0, or higher. Annual emissions shall be calculated using the input parameters specified in Condition 6.2, the annual quantity of condensate unloaded and the sales oil properties as determined by Condition 6.4.

6.1.2 Emissions from truck loading shall be determined by using the annual quantity of condensate unloaded (as determined by Condition 6.3) in the following equation (from AP-42, Section 5.2, dated January 1995, Equation 1):

$L_L = 12.46 \times (SMP)/T$

Where: L_L = loading losses (lb/1,000 gal of liquid loaded)
S = saturation factor (AP-42, Table 5.2-1)
P = true vapor pressure of liquid loaded (psia)
M = molecular weight of vapors (lb/lb-mole)
T = temperature of bulk liquid loaded (º R)

Note that average parameters for P, M and T shall be used in the annual emission calculation.

6.2 The input parameters to E & P Tanks shall be monitored as follows:

6.2.1 The ambient temperature shall be monitored and recorded for each unloading event. The average ambient temperature shall be used to calculate annual emissions.

6.2.2 The separator temperature (temperature of condensate in tanks) shall be monitored and recorded for each unloading event. The average separator temperature shall be used to calculate annual emissions.

6.2.3 The permittee shall sample and analyze the low-pressure oil annually for the compositional E & P Tanks input requirements. A copy of the procedures used to obtain, collect and handle the samples shall be maintained and made available to the Division upon request.

6.3 The quantity of condensate unloaded shall be monitored and recorded during each unloading event and summed to determine the annual quantity of condensate unloaded. The annual quantity of condensate unloaded shall be used to calculate emissions as required by Condition 6.1.

6.4 The sales condensate shall be analyzed as follows:

6.4.1 The sales condensate shall be sampled and analyzed annually to determine the reid vapor pressure (RVP). A copy of the procedures used to obtain and analyze samples shall be maintained and made available to the Division upon request. The RVP determined by the analysis shall be used to calculate emissions as required by Condition 6.1.

6.4.2 Records of the actual API gravity from sales receipts shall be retained and made available to the Division upon request. All sales receipts for the annual period shall be used to determine the average API gravity. The average API gravity shall be used to calculate emissions as required by Condition 6.1.

SECTION III - Permit Shield

Regulation No. 3, 5 CCR 1001-5, Part C, §§ I.A..4, V.D., & XIII.B and § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based on the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.

Emission Unit Description and Number	Non-Applicable Requirement	Justification
All	Regulation No. 1, Section III-Particulate Emissions	Emission Units do not fall under the regulated categories for Particulate Emissions
All	Regulation No. 1, Section IV-Continuous Emission Monitoring Requirements for New or Existing Sources	No sources fall under the source categories required to install, calibrate, certify or maintain continuous emission monitoring systems for opacity and/or sulfur dioxide and/or carbon monoxide
All	Regulation No. 3, Part D, Section XIII-Federal Class I Areas	Emission units do not impact Class I areas
All	Regulation No. 3, Part D, Section XIV - Visibility	Emission units do not impact Class I areas
All	Regulation No. 6, Part A-Federal New Source Performance Standards, Subpart A - General Provisions	Emission units are not affected facilities
All	Regulation No. 6, Part A-Federal New Source Performance Standards, Subpart K, Ka, Kb - Storage Vessels for Petroleum Liquids	No emission units commenced construction, after June 11, 1973 that met the applicability provisions of the standards
All	Regulation No. 6, Part A-Federal New Source Performance Standards, Subpart KKK-Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	No emission units commenced construction, after January 20, 1984 that met the applicability provisions of the standards
All	Regulation No. 6, Part A-Federal New Source Performance Standards, Subpart LLL - SO_2 Emissions from Onshore Natural Gas Processing Plants	There are no sweetening units at this site
All	Regulation No. 8, Part A, NESHAPs, 40 CFR Part 61, Subpart J - Equipment Leaks of Benzene	Emissions are less than 10 weigh percent benzene
All	Regulation No. 8, Part A, NESHAPs, 40 CFR Part 61, Subpart V - Equipment Leaks (VHAP)	Emissions are less than 10 weight percent volatile hazardous air pollutants.

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.

3. Streamlined Conditions

The following applicable requirements have been subsumed within this operating permit using the pertinent streamlining procedures approved by the U.S. EPA. For purposes of the permit shield, compliance with the listed permit conditions will also serve as a compliance demonstration for purposes of the associated subsumed requirements.

No conditions have been streamlined.

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.1. 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) 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, 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); and

(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. Affirmative Defense Provision for Excess Emissions during Malfunctions

Note that until such time as the U.S. EPA approves this provision into the Colorado State Implementation Plan (SIP), it shall be enforceable only by the State.

An affirmative defense to a claim of violation under these regulations is provided to owners and operators for civil penalty actions for excess emissions during periods of malfunction. 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 evidence that:

(i) The excess emissions were caused by a sudden, unavoidable breakdown of equipment, or a sudden, unavoidable failure of a process to operate in the normal or usual manner, beyond the reasonable control of the owner or operator;

(ii) The excess emissions did not stem from any activity or event that could have reasonably been foreseen and avoided, or planned for, and could not have been avoided by better operation and maintenance practices;

(iii) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded;

(iv) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions;

(v) All reasonably possible steps were taken to minimize the impact of the 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;

(viii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

(ix) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This section 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; and

(x) During the period of excess emissions, there were no exceedances of the relevant ambient air quality standards established in the Commissions' Regulations that could be attributed to the emitting source.

The owner or operator of the facility experiencing excess emissions during a malfunction shall notify the division verbally as soon as possible, but no later than noon of the Division's next working day, and shall submit written notification following the initial occurrence of the excess emissions by the end of the source's next reporting period. 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 failures to meet federally promulgated performance standards or emission limits, including, but not limited to, new source performance standards and national emission standards

for hazardous air pollutants. The affirmative defense provision does not apply to state implementation plan (sip) limits or permit limits that have been set taking into account potential emissions during malfunctions, including, but not necessarily limited to, certain limits with 30-day or longer averaging times, limits that indicate they apply during malfunctions, and limits that indicate they apply at all times or without exception.

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.

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

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 or national emissions standards for hazardous air pollutants, or 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., and § 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

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 malfunction 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. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

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 malfunction conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

(i) For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

(ii) For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

(iii) For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"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 compliance assurance 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.

c. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

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 - MONITORING AND PERMIT DEVIATION REPORT
C - COMPLIANCE CERTIFICATION REPORT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS

*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.

APPENDIX A - Inspection Information

Directions to Plant:

From Denver, CO, follow Interstate 70 East to the Dear Trail Exit. From town, take County Road 38 West approximately 7.5 miles. The Plant borders County Road 38 to the south.

Safety Equipment Required:

Hard Hat
Safety Shoes
Hearing Protection
Eye Protection with Side Shields
Flame Retardant Clothing ("Nomex®")

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on February 1, 1995 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.

Insignificant activities and/or sources of emissions as submitted in the application are as follows:

Blowdown Vent Stack
Emergency Generator (Waukesha F1197G, 225 hp)
Degreaser

<u>Boilers and Heaters</u>

Glycol Dehydrator Reboiler (0.4 mmBtu/hr)
Plant Boiler, H-1 (1.68 mmBtu/hr)
Trane Air Unit/Rheem Water Heater (0.138 mmBtu/hr)
Sterling Heaters #1 and #2, auxiliary (0.04 mmBtu/hr, each)
Sterling Heaters #3, #5 and #5, storage building (0.04 mmBtu/hr, each)
Goodman Heater, office (0.1 mmBtu/hr)
Re-Verber-Ray heaters #1 and #2, shop (0.075 mmBtu/hr, each)
Wellhead Heaters 1-9, 19-32, 37-39, 41, 43-45,47,48 (32, each approx. 1 mmBtu/hr)
Sivalls Treater, X-51 (0.5 mmBtu/hr)

Storage Tanks
Mercaptan, 5 gals, pressurized
Methanol 2,000 gals.
Engine Oil 6,856 Gals.
Oil/Water 3,780 gals.
Lube Oil 377 gals.
Ethylene Glycol, 2 @ 10,500 gals., 1 @ 12,600 gals.
Ambitrol 6,856 gals.
Used Lube Oil 4,500 gals.
Three (3) condensate tanks, each 34,500 gallons (with 30 psig blanket)

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APPENDIX B

Reporting Requirements and Definitions

with codes ver 2/20/07

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.

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 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, "malfunction" shall refer to both emergency conditions and malfunctions. 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 as set forth in General Condition 21. 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:

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

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;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. 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.[1]
- 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.

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 40 CFR 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 and Emergencies

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

[1] 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.

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.

Emergency Provisions

Under the Emergency provisions of Part 70 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.

Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or malfunction 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 malfunctions) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Colorado Interstate Gas Co. – Latigo Compressor Station
OPERATING PERMIT NO: 95OPAR037
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates

Operating Permit Unit ID	Unit Description	Deviations Noted During Period?[1]		Deviation Code[2]	Malfunction/ Emergency Condition Reported During Period?	
		YES	NO		YES	NO
E001 – E003	Superior Model 8GTL-825 1069 HP Internal Combustion Engines, 4-Cycle Lean Burn, Serial Nos. 265989, 265999 and 266009. Natural Gas Fired.					
E004	Superior Model 8GTL-825 963 HP Internal Combustion Engine, 4-Cycle Lean Burn, Serial No. 273579, Natural Gas Fired.					
E005	Superior Model 6G510 400 HP Internal Combustion Engine, 4-Cycle Rich Burn, Serial No. 271549, Natural Gas Fired.					
E006	Superior Model 6G510 400 HP Internal Combustion Engine, 4-Cycle Rich Burn, Serial No. 264179, Natural Gas Fired.					
D001	Olman Heath model 2205G 140 MMscfd Glycol Dehydration Unit, Serial No. 23596. Equipped with Flash Tank					
F001	Fugitive VOC Emissions from Equipment Leaks					
M001	Condensate Truck Loading					
	General Conditions					
	Insignificant Activities					

[1] 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.

[2]Use the following entries as appropriate:
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 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Colorado Interstate Gas Co – Latigo Compressor Station
OPERATING PERMIT NO: 95OPAR037
REPORTING PERIOD:

Is the deviation being claimed as an: Emergency _____ Malfunction_____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction _____
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Malfunctions/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/06

Is the deviation being claimed as an: Emergency _____ Malfunction __XX____ N/A

(For NSPS/MACT) Did the deviation occur during: Startup _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/06
END- 1800 4/10/06

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Malfunction/Emergencies Reported (if applicable)

5/30/06 to A. Einstein, APCD

Deviation Code _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Colorado Interstate Gas Co – Latigo Compressor Station

FACILITY IDENTIFICATION NUMBER: 0050055

PERMIT NUMBER: 95OPAR037

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.38. 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.

Printed or Typed Name | Title

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 Reports

with codes ver 2/20/07

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: Colorado Interstate Gas Co – Latigo Compressor Station

OPERATING PERMIT NO: 95OPAR037
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 [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
E001 – E003	Superior Model 8GTL-825 1069 HP Internal Combustion Engines, 4-Cycle Lean Burn, Serial Nos. 265989, 265999 and 266009. Natural Gas Fired.						
E004	Superior Model 8GTL-825 963 HP Internal Combustion Engine, 4-Cycle Lean Burn, Serial No. 273579, Natural Gas Fired.						
E005	Superior Model 6G510 400 HP Internal Combustion Engine, 4-Cycle Rich Burn, Serial No. 271549, Natural Gas Fired.						
E006	Superior Model 6G510 400 HP Internal Combustion Engine, 4-Cycle Rich Burn, Serial No. 264179, Natural Gas Fired.						

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
D001	Olman Heath model 2205G 140 MMscfd Glycol Dehydration Unit, Serial no. 23596. Equipped with Flash Tank						
F001	Fugitive VOC Emissions from Equipment Leaks						
M001	Condensate Truck Loading						
	General Conditions						
	Insignificant Activities [4]						

[1] If deviations were noted in a previous deviation report , 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.

[2] 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.

[3] 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.

[4] 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

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

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.

_____

Printed or Typed Name Title

_____

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

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance
Air and Radiation Programs, 8P-AR
U.S. Environmental Protection Agency, Region VIII
1595 Wynkoop Street
Denver, CO 80202-1129

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
EPA -	Environmental Protection Agency
FR -	Federal Register
G -	Grams
Gal -	Gallon
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
PM -	Particulate Matter
PM_{10} -	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_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	MODIFICATION TYPE	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
January 30, 2007	Significant Modification	**Emissions Change**	**Note that the change in emissions is due to a change in emission factors, not due to a modification to existing equipment or the addition of new equipment: Increases: NO_X - 264.1 tpy and VOC – 12.65 tpy, Decreases: CO - 440.7**
		Section I	Revised Condition 1.1 to indicate that the 8-hr ozone control area is defined in Regulation No. 7, rather than citing the federal register. Added a note to Condition 1.4 to indicate that only the last paragraph of Section IV, Condition 3.g is state-only enforceable and removed Section II, Conditions 1.4, 2.4 & 7 as a state-only enforceable requirements, since they no longer apply. Revised the table in Condition 6.1 to indicate that engines E001 through E004 are lean burn engines. Added a compliance schedule (Condition 7) to increase the stack heights for the existing engines.
		Section II.1	Condition 1.1 was revised to include appropriate emission factors and to revise emission limits to reflect the new emission factors. Condition 1.5 was removed. Added a condition to monitor the oxygen content in the exhaust gas. Minor language changes were made to other conditions to clarify that only natural gas is used as fuel.
		Section II.2	Condition 2.1 was revised to include the appropriate emission factors. Condition 2.4 was removed. Added a condition to monitor the oxygen content in the exhaust gas. Minor language changes were made to other conditions to clarify that only natural gas is used as fuel.
		Section II.3.	Minor language changes were made to various conditions to clarify that only natural gas is used as fuel.
		Section II.4	Revised Condition 4.1.3 to specifically state when GLYCalc has to be run. Revised the comparison criteria (Condition 4.1) for the cold separator temperature from “at or below” to “at or above”. Revised the method to calculate ethylene glycol emissions (Condition 4.1.4).
		Section II.6	In order to be consistent with the Division’s March 7, 2005 Condensate Tank Guidance, revised Condition 6.2.3 to require that the permittee sample the low pressure oil, rather than the high pressure oil.
		Section II.7	Removed the Ozone Early Action Compact Requirements since they no longer apply.
		Section IV	Removed the statement in Condition 3.g (affirmative defense provisions) addressing EPA approval and state-only applicability. General Condition No. 21 (prompt deviation reporting) was revised to include the definition of prompt in 40 CFR Part 71. Replaced the phrase “enhanced monitoring” with “compliance assurance monitoring” in Condition 22.d.
		Appendix A	Revised the insignificant activity list to reflect the insignificant activities included in the modeling analysis

DATE OF REVISION	MODIFICATION TYPE	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
January 30, 2007	Significant Modification	Appendices B and C	Replaced with latest version of appendices. Revised the description of engines E001 through E004 as lean burn engines.
		Appendix D	Revised mailing addresses for EPA.
July 3, 2007	Minor Modification	Section I	Added Section IV, condition 3.d as a state-only condition in Condition 1.4.
		Section II.1	Revised the language for determining the Btu content of natural gas in Condition 1.4.
		Section IV	The upset revisions in the Common Provisions Regulation (general condition 3.d) were revised December 15, 2006 (effective March 7, 2007) and the revisions were included in the permit. Note that these provisions are state-only enforceable until approved by EPA into Colorado's state implementation plan (SIP). Replaced the reference to "upset" in Condition 5 (emergency provisions) and 21 (prompt deviation reporting) with "malfunction".
		Appendices	Replaced Appendices B and C with the latest version.
August 29, 2008	Minor Modification	Section I	Revised the description in Condition 1.1 and the language in Condition 3 to indicate the attainment status of the area in which the facility is located.
		Section II.4	Replaced the "ten (10) days" in Condition 4.1.3 with "240 hours".
		Section III	Removed the provisions for Reg 3, Part D, Section V in the table in Section 1 since the facility is now located in a non-attainment area.