Colorado Department
of Public Health
and Environment

OPERATING PERMIT

Adena Crude Terminal

Issued January 1, 1999

Last Revised May 26, 1999

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME: Adena Crude Terminal

FACILITY ID: 0870054

ISSUE DATE: January 1, 1999
EXPIRATION DATE: January 1, 2004
MODIFICATIONS: See Appendix F of Permit

OPERATING PERMIT NUMBER

98OPMR201

Issued in accordance with the provisions of Colorado Air Quality Control Act, 25-7-101 et seq. (1989 & 1995 Supp.) and applicable rules and regulations.

ISSUED TO:
TPI Petroleum Inc.
P.O. Box 696000
San Antonio, TX 78269-6000

PLANT SITE LOCATION:
T2N, R57W, Sec 32 NE/4, NE/4, NE/4
Morgan County

INFORMATION RELIED UPON
Operating Permit Application Received: June 24, 1998
And Additional Information Received: May 25, 1999

Nature of Business: Crude oil storage and truck loading
Primary SIC: 4613

RESPONSIBLE OFFICIAL
Name: Paul Eisman
Title: Senior Vice President
Supply Chain Management
Phone: (210) 592-2000

FACILITY CONTACT PERSON
Name: Matthew H. Hodges
Title: Senior Environmental Coordinator
Phone: (210) 592-4620

SUBMITTAL DEADLINES
Semi-Annual Monitoring Period: January 1 - June 30, July 1 - December 31
Semi-Annual Monitoring Report: August 1, 1999 & February 1, 2000 and subsequent years
Annual Compliance Period: Begins January 1 to December 31
Annual Compliance Certification: February 1, 2000 and subsequent years

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SECTION I - General Activities and Summary

1. **Permitted Activities**

1.1. This facility consists of a crude oil storage and truck loading facility which falls into the Standard Industrial Classification 4613. Processes include one (1) crude oil storage tank with internal floating roof, crude oil truck loading rack, and fugitive VOC emissions from equipment leaks.

The facility is located in Morgan County. The area in which the plant operates is designated as attainment for all criteria pollutants.

There are no affected states within 50 miles of the plant and 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. This Operation 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 permit: 97MR0157.

1.4. All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**
Permit Condition Number(s): Section IV - Conditions 13, 17 (as noted)

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

1.6. No Operating Permits are associated with this facility for purposes of determining applicability

of Prevention of Significant Deterioration regulations.

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.

2.1.1. No separate operating scenarios have been specified.

3. Prevention Of Significant Deterioration (PSD)

3.1. This source is categorized as a synthetic minor source (no single criteria pollutant emissions with a potential to emit of greater than 250 tpy) with respect to Prevention of Significant Deterioration (PSD) as of issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part B, Section IV.D.3). Future modifications to this facility may result in an exceedance of the major source threshold. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase for any pollutant as listed in Regulation No. 3, Part A, Section I.B.58 or a modification which is major by itself will result in the application of the PSD review requirements.

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

4.1. This facility is not subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).

5. **Summary of Emission Units**

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

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
S001	002	702	One (1) Crude Oil Storage Tank With Internal Floating Roof, 48,000 Barrel Capacity.	Controlled By Internal Floating Roof
S002	002	L-1	Crude Oil Truck Loading Operations	Uncontrolled
F003	002	F-1	Fugitive VOC Emissions From Equipment Leaks	Uncontrolled

SECTION II - Specific Permit Terms

1. S001 - Crude Oil Storage Tank With Internal Floating Roof

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	1.1.	NA	2.64 tons/yr	Input into Tanks Version 3.0 or Higher	Recordkeeping and Calculation	Annually
Crude Oil Throughput	1.2.	NA	153.3 MMgal/yr	NA	Recordkeeping	Monthly
Internal Floating Roof Tank Requirements	1.3.	NA	NA	NA	As required in Regulation 7, Part VII.C.	
NSPS Kb	1.4.	NA	NA	NA	As required in NSPS Kb	
General Provisions	1.5.	NA	NA	NA	As required in the NSPS General Provisions	

1.1. Emission of air pollutants shall not exceed the limitation above (Construction Permit 97MR0157 as modified under the provisions of Section I, Condition 1.3). Compliance with throughput limit in Condition 1.2 below shall demonstrate compliance with the emission limit. Annual emissions shall be calculated using Tanks Version 3.0 or higher for APEN purposes.

1.2. The throughput of crude oil shall not exceed the limitation above (Construction Permit 97MR0157 as modified under the provisions of Section I, Condition 1.3). Throughput shall be measured and recorded each month. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

1.3. The source is subject to Regulation No. 7, Part VII.C, Regulation to Control Emissions of Volatile Organic Compounds from Storage of Crude Oil which includes the provisions of Section VI subparagraph B.1.b and paragraph B.2.

1.4. The crude oil storage tank is subject to 40 CFR 60 Subpart Kb (Regulation No. 6, Part A, Subpart Kb incorporated by reference) - Standards of Performance for Volatile Organic Liquid Storage Vessels . Specifically the tanks are subject to the following requirements:

1.4.1. Testing and procedure methods shall be performed in accordance with the requirements in § 60.113b.

1.4.2. The source shall follow Reporting and Recordkeeping Requirements identified in § 60.115b.

1.4.3. The Monitoring of Operations shall be conducted in accordance with the requirements in § 60.116b.

1.5. The facility is subject to the General Provisions of 40 CFR 60, Subpart A (Regulation No. 6, Part A, General Provisions).

1.5.1. No article, machine, equipment or process shall be used to conceal an emissions which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere (§61.12).

1.5.2. Records of startups, shutdowns, and malfunctions shall be maintained, as required under (§60.7).

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

2. **S002 - Crude Oil Truck Loading Operations**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	2.1.	NA	209.78 tons/yr	2.732 lb/Mgal	Recordkeeping and Calculation	Annually
Crude Oil Throughput	2.2.	NA	153.3 MMgal/yr	NA	Recordkeeping	Monthly

2.1. Emission of air pollutants shall not exceed the limitation above (Construction Permit 97MR0157 as modified under the provisions of Section I, Condition 1.3). Compliance with throughput limit in Condition 2.2 shall demonstrate compliance with the emission limit. Annual emissions shall be calculated using the equation below for APEN purposes.

Emissions (tons/yr) = EF (lb/Mgal) x Throughput (Mgal/yr) x 1/2000 (ton/lb)

2.2. The throughput of crude oil through the loading rack shall not exceed the limitation above (Construction Permit 97MR0157 as modified under the provisions of Section I, Condition 1.3). Throughput shall be measured and recorded each month. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

3. **F003 - Fugitive VOC Emissions From Equipment Leaks**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	3.1.	NA	14.17 tons/yr	By Component Type - EPA's Protocol for Equipment Leaks	Recordkeeping and Calculation	As Noted

3.1. VOC emissions from equipment leaks shall not exceed the limitations stated above (Colorado Construction Permit 97MR0157). Emissions shall be calculated using the emission factors and equations listed below:

Emission Factors for individual types of components in lbs/component-hr (Protocol for Equipment Leak Emission Estimates, EPA-453/R-93-026, Table 2-8).

Pipeline Valves = 2.4E-02
Flanges = 5.5E-04
Pump Seals = 2.51E-01
Process Drains = 7.0E-02
Sample Connections = 3.3E-02

Emissions of VOC per component:
No. of Components x EF (lbs/component-hr) x 8760 hrs/yr

3.1.1. A component count shall be conducted within 90 days of the issuance of this permit and every five (5) years thereafter to verify existing components and inventory.

3.1.2. A running total shall be kept of all additions and subtractions to the component count. The most recent count shall be used for emission calculations and compliance purposes.

SECTION III - Permit Shield

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

1. **Specific Conditions**

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

Emission Unit Description & Number	Applicable Requirement	Justification
Unit S001	40 CFR 60 Subparts K and Ka (Regulation No. 6, Part A, Subparts K and Ka)	The storage vessel was modified after July 23, 1984.
Unit S001	40 CFR 63 Subpart OO (Tanks - Level I MACT)	No applicable parts of 40 CFR 60, 61 and 63 reference Subpart OO for this facility at the time of permit issuance.
Unit F003	40 CFR 63 Subpart H (Organic HAP Equipment Leaks)	No applicable parts of 40 CFR 60, 61 and 63 reference Subpart H for this facility at the time of permit issuance.
Facility	NESHAPs, 40 CFR Part 61, Subpart J (Colorado Regulation No. 8, Part A, Subpart J)	This requirement (Equipment Leaks of Benzene) is not applicable as equipment is not in benzene service (fluids processed contain less than 10 weight percent benzene).
Facility	NESHAPs, 40 CFR Part 61, Subpart V (Colorado Regulation No. 8, Part A, Subpart V)	This requirement (Equipment Leaks of Volatile Hazardous Air Pollutants (VHAP)) is not applicable as equipment is not in VHAP service (fluids processed contain less than 10 weight percent volatile hazardous air pollutants by weight).

2. General Conditions

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

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

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

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

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

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

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

SECTION IV - General Permit Conditions

1. **Administrative Changes**

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

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

2. **Certification Requirements**

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

a. Any application, report, document and compliance certification submitted to the Air Pollution Control Division pursuant to Regulation No. 3 or the Operating Permit shall contain a certification by a responsible official of the truth, accuracy and completeness of such form, report or certification stating that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.

b. All compliance certifications for terms and conditions in the Operating Permit shall be submitted to the Air Pollution Control Division at least annually unless a more frequent period is specified in the applicable requirement or by the Division in the Operating Permit.

c. Compliance certifications shall contain:

(I) the identification of each permit term and condition that is the basis of the certification;

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

(iv) the method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(v) such other facts as the Air Pollution Control Division may require to determine the compliance status of the source.

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

e. If the permittee is required to develop and register a risk management plan pursuant to § 112(r) of the federal act, the permittee shall certify its compliance with that requirement; the Operating Permit shall not incorporate the contents of the risk management plan as a permit term or condition.

3. **Compliance Requirements**

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

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

b. It shall not be a defense for a permittee in an enforcement action or a consideration in favor of a permittee in a permit termination, revocation or modification action or action denying a permit renewal application that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

c. The permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of any request by the permittee for a permit modification, revocation and reissuance, or termination, or any notification of planned changes or anticipated noncompliance does not stay any permit condition, except as provided in §§ X. and XI. of Regulation No. 3, Part C.

d. The permittee shall furnish to the Air Pollution Control Division, within a reasonable time as specified by the Division, any information that the Division may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Division copies of records required to be kept by the permittee, including information claimed to be confidential. Any information subject to a claim of confidentiality shall be specifically identified and submitted separately from information not subject to the claim.

e. Any schedule for compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental, and shall not sanction noncompliance with, the applicable requirements on which it is based.

f. For any compliance schedule for applicable requirements with which the source is not in compliance at the time of permit issuance, the permittee shall submit, at least every 6 months unless a more frequent period is specified in the applicable requirement or by the Air Pollution Control Division, progress reports which contain the following:

(I) dates for achieving the activities, milestones, or compliance required in the schedule for compliance, and dates when such activities, milestones, or compliance were achieved; and

(ii) an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

g. The permittee shall not knowingly falsify, tamper with, or render inaccurate any monitoring device or method required to be maintained or followed under the terms and conditions of the Operating Permit.

4. **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 upset provision contained in any applicable requirement.

5. **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."

6. **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.

7. **Fee Payment**

Regulation No. 3, 5 CCR 1001-5, Part A, § VI.; Part C, § V.C.12.

a. The permittee shall pay an annual emissions fee in accordance with Regulation No. 3, Part A, Section VI. 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 of $50 per hour. 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 of $100 for each APEN or revised APEN filed.

8. **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.

9. **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.

10. **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.

11. **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.

12. **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.

13. **Odor**

Regulation No. 2, 5 CCR 1001-3

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

14. **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.

15. **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.

16. **Open Burning**

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

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

17. **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., V. of Regulation No. 15 shall be enforced as a matter of state law only.

18. **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.

19. **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.

20. **Prompt Deviation Reporting**

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

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

21. **Record Keeping and Reporting Requirements**

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

a. Unless otherwise provided in the source specific conditions of this Operating Permit, the permittee shall maintain compliance monitoring records that include the following information:

(I) date, place as defined in the Operating Permit, and time of sampling or measurements;

(ii) date(s) on which analyses were performed;

(iii) the company or entity that performed the analysis;

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

(vi) the operating conditions at the time of sampling or measurement.

b. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information, for this purpose, includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Operating Permit. With prior approval of the Air Pollution Control Division, the permittee may maintain any of the above records in a computerized form.

c. Permittees must retain records of all required monitoring data and support information for the most recent twelve (12) month period, as well as compliance certifications for the past five (5) years on-site at all times. A permittee shall make available for the Air Pollution Control Division's review all other records of required monitoring data and support information required to be retained by the permittee upon 48 hours advance notice by the Division.

d. The permittee shall submit to the Air Pollution Control Division all reports of any required monitoring at least every six (6) months, unless an applicable requirement, the enhanced monitoring rule, or the Division requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

e. The permittee shall file an Air Pollutant Emissions Notice ("APEN") prior to constructing, modifying, or altering any facility, process, activity which constitutes a stationary source from which air pollutants are or are to be emitted, unless such source is exempt from the APEN filing requirements of Regulation No. 3, Part A, § II.D. A revised APEN shall be filed annually whenever a significant change in emissions, as defined in Regulation No. 3, Part A, § II.C.2., occurs; whenever there is a change in owner or operator of any facility, process, or activity; whenever new control equipment is installed; whenever a different type of control equipment replaces an existing type of control equipment; whenever a permit limitation must be modified; or before the APEN expires. An APEN is valid for a period of five years. The five-year period recommences when a revised APEN is received by the Air Pollution Control Division. Revised APENs shall be submitted no later than 30 days before the five-year term expires. Permittees submitting revised APENs to inform the Division of a change in actual emission rates must do so by April 30 of the following year. Where a permit revision is required, the revised APEN must be filed along with a request for permit revision. APENs for changes in control equipment must be submitted before the change occurs. Annual fees are based on the most recent APEN on file with the Division.

22. **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.

23. **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.

24. **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.

25. **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.

26. **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.

27. **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.

28. **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 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.

29. **Wood Stoves and Wood burning Appliances**

Regulation No. 4, 5 CCR 1001-6

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

OPERATING PERMIT APPENDICES

A - INSPECTION INFORMATION
B - COMPLIANCE MONITORING REPORT FORMAT
C - COMPLIANCE CERTIFICATION REPORT FORMAT
D - NOTIFICATION ADDRESSES
E - PERMIT ACRONYMS
F - PERMIT MODIFICATIONS

*DISCLAIMER:

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

APPENDIX A - Inspection Information

1. **Directions to Plant:**
   Take 1-76 northwest from Denver to Exit 80. Exit on Main Street and proceed south to Platte Road. Continue east on Platte Road to Sherman. Go south on Sherman for approximately 9 miles. Proceed east on county road for 1 mile. Then go south on to another county road to the site.

2. **Safety Equipment Required:**
   Eye Protection, Hard Hat, and Safety Shoes

3. **Facility Plot Plan:**
   Figure 1 (following page) shows the plot plan as submitted on June 24, 1998 with the source's Title V Operating Permit Application.

4. **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:

   Landscaping and site housekeeping devices equal to or less than 10 HP in size.

APPENDIX B

Reporting Requirements and Definitions

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 upset conditions as defined in this Appendix, the probable cause of such deviations, and any corrective actions or preventive measures taken. All deviations from any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

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

For purposes of this operating permit, the Division is requiring that the permit deviation reports are due every six months unless otherwise noted in the permit. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS.

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;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard 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. Note that as of the issue date of this permit that Colorado has not yet adopted the CAM rule.

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 = Other: When the deviation is not covered by any of the above categories

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

Submission of compliance certifications with terms and conditions in the permit, including emission limitations, standards, or work practices, is required not less than annually. Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

- The identification of each term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each permit term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification;
- Such other facts as the Division may require 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 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. Note that as of the issue date of this permit that Colorado has not yet adopted the CAM rule.

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.

APPENDIX B

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

Startup, Shutdown, and Malfunctions
Please note that deviations of New Source Performance Standards (NSPS) and some 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 deviations would, however, still be noted in the deviation report and reported as excess emissions per the NSPS/MACT rules. In regards to compliance certifications, the permittee should be confident of the information related to those deviations when making compliance determinations since they are subject to Division review. The concepts of Startup, Shutdown and Malfunctions also exist for Best Available Control Technology (BACT) sources, but are not applied in the same fashion as for NSPS and MACT sources.

Emergencies and Upsets
Under the Emergency provisions of Part 70 and the Upset provisions of the State regulations, certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported. Unlike the NSPS/MACT startup, shutdown, and malfunction provisions, however, these deviations must be counted as non-compliance vis-a-vis the annual compliance certifications.

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

DEFINITIONS

Malfunction 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.

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

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

APPENDIX B

Required Format for Monitoring and Permit Deviation Report - Part I

1. Following is the format for the Monitoring and Permit Deviation report to be submitted to the Division on a semi-annual basis unless otherwise noted in the permit. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

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 upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation.

FACILITY NAME: TPI Petroleum Inc. - Adena Crude Terminal
OPERATING PERMIT NO: 98OPMR201
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]		Upset/Emergency Condition Reported During Period?	
		YES	NO			YES	NO
S001	One (1) Crude Oil Storage Tank With Internal Floating Roof, 48,000 Barrel Capacity.						
S002	Crude Oil Truck Loading Operations						
F003	Fugitive VOC Emissions From Equipment Leaks						
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 = Other:	When the deviation is not covered by any of the above categories

Required Format for Deviation Report - Part II

FACILITY NAME: TPI Petroleum Inc. - Adena Crude Terminal
OPERATING PERMIT NO: 98OPMR201
REPORTING PERIOD: _____

Type of deviation (see footnote 2 above):

Is the deviation being claimed as an: Emergency _____ Upset _____ 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 Upsets/Emergencies Reported (if applicable)

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

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

Type of deviation (see footnote 2 above): 1 (opacity)

Is the deviation being claimed as an: Emergency _____ Upset __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 4/10/96
END- 1800 4/10/96

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Upsets/Emergencies Reported (if applicable)
4/10/96 to S. Busch, APCD

Required Format for Deviation Report Certification - Part III

TITLE V OPERATING PERMIT

CERTIFICATION FOR SEMI-ANNUAL DEVIATION REPORT

SOURCE NAME: TPI Petroleum Inc. - Adena Crude Terminal

FACILITY IDENTIFICATION NUMBER: 0870054

PERMIT NUMBER: 98OPMR201

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. The responsible official signing this certification must be pre-approved by the Division in accordance with Colorado Regulation No. 3, Part A, Section I.B.54. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

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

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

_____

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 Report

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

FACILITY NAME: TPI Petroleum Inc. - Adena Crude Terminal
OPERATING PERMIT NO: 98OPMR201
REPORTING PERIOD: _____

I. Facility

__ 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.

___ 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, **EXCEPT** for the deviations identified in the table below. 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)

If any deviations for any permit term or condition occurred during the annual reporting period, fill in the required information for all emission points (regardless of compliance status) in the following table.

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
S001	One (1) Crude Oil Storage Tank With Internal Floating Roof, 48,000 Barrel Capacity.								
S002	Crude Oil Truck Loading Operations								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
F003	Fugitive VOC Emissions From Equipment Leaks								
General Conditions									
Insignificant Activities [5]									

[1] If deviations were noted in the previous deviation report (i.e. for the first six months of the annual reporting period), put an "X" under "previous". If deviations were noted in the current deviation report (i.e. for the last six months of the annual reporting period), put an "X" under "current". Mark both columns if both apply.

[2] Fill in this column for all listed points.

[3] 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.

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

[5] 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 June 20, 1999.

III. Certification

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

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

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

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500
Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Pollution Prevention, State and Tribal Programs
Air Program, 8P2-A
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 500
Denver, CO 80202

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day

N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM_{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	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
May 26, 1999	Administrative Amendment	Information Page	Change Responsible Official.
		Appendix B and C	Change to new wording.