

Colorado Department of Public Health and Environment

OPERATING PERMIT

EAST HIAWATHA COMPRESSOR STATION

First Issued: February 1, 1998

Renewed: August 1, 2004

Last Revised: November 7, 2006

AIR POLLUTION CONTROL DIVISION COLORADO OPERATING PERMIT

FACILITY NAME: East Hiawatha OPERATING PERMIT NUMBER

Compressor Station

FACILITY ID: 0810076

RENEWED: August 1, 2004 EXPIRATION DATE: August 1, 2009

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.

95OPMF040

ISSUED TO: PLANT SITE LOCATION:

Questar Gas Management Company Section 15, T12N, R100W

180 East 100 South Craig, CO Salt Lake City, UT 84145-0601 Moffat County

INFORMATION RELIED UPON

Operating Permit Renewal Application

Received: January 31, 2002

And Additional Information Received:

Nature of Business: Natural Gas Compression

Primary SIC: 4922

RESPONSIBLE OFFICIAL FACILITY CONTACT PERSON

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SUBMITTAL DEADLINES

Semi-Annual Monitoring Period: August 1 – January 31, February 1 – July 31

Semi-Annual Monitoring Report: Due on March 1, 2005 & September 1, 2005 & subsequent years

Annual Compliance Period: August 1 through July 31

Annual Compliance Certification: Due on September 1, 2005 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.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 The East Hiawatha Compressor Station uses three natural gas fired reciprocating internal combustion engines which drive compressors to transmit natural gas gathered from gas field laterals to a primary pipeline. In addition, two natural gas fired internal combustion engines are used to drive generators to provide electric power for the station. All five engines have individual stacks to vent the products of combustion.

The station also includes a glycol dehydration unit which contacts "dry" triethylene glycol with the natural gas stream to remove moisture. The "wet" glycol mixture is regenerated in a heated tank for reuse in the process. Water vapor and entrained volatile organic compounds are emitted through a still vent. Combustion emissions from the heater portion of this unit are vented through a separate stack. The heater is considered

Other equipment on site includes a methanol storage tank and condensate tanks. Methanol is injected into the gas stream to prevent the formation of water hydrates. The condensate tanks store a mixture of hydrocarbon liquids and water separated from the inlet gas stream by a series of separation and scrubbing vessels. The methanol tank is included in the insignificant activity list in Appendix A of the permit. The condensate storage tanks have VOC emissions above APEN de minimis levels and have been included in Section II of this permit.

There is also a natural gas fired internal combustion engine driving a compressor and triethylene glycol dehydrator associated with the Hiawatha Deep Compressor Station. The Hiawatha Deep and East Hiawatha are co-located and the Division considers that for purposes of Title V and PSD the Division considers the two facilities a single source.

The facility is located in Moffat County approximately 70 miles northwest of Craig, CO, in an area which is designated as attainment for all criteria pollutants.

Wyoming and Utah are within a 50 mile radius of this station and are therefore considered affected states. There are no federal Class I designated areas within 100 kilometers of the plant. Dinosaur National Monument is federal land within 100 kilometers of the facility. This area has been designated by the State to have the same sulfur dioxide increment as federal Class I designated areas.

- 1.2 Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air pollutants from this facility in accordance with the requirements, limitations, and conditions of this permit.
- 1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all

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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: 95MF187, 04MF0936 and 05MF0429.

- 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.g (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 (6/1/06 version)

The following Alternative Operating Scenario (AOS) for temporary and permanent engine replacement has been reviewed in accordance with the requirements of Regulation No. 3., Part A, Section IV.A, Operational Flexibility-Alternative Operating Scenarios, and Regulation No. 3, Part B, Construction Permits, and Regulation No. 3, Part D, Major Stationary Source New Source review and Prevention of Significant Deterioration, and has been found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

2.1 Engine Replacement

The following AOS is incorporated into this permit in order to deal with a compressor engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of either a temporary or permanent replacement engine. "Temporary" is defined as in the same service for 90 operating days or less in any 12 month period. "Permanent" is defined as in the same service for more than 90 operating days in any 12 month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day counts towards the 90 day total. Note that the compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.

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Results of all tests and the associated calculations pursuant required by this AOS shall be submitted to the Division within 30 calendar days of the test. Results of all tests shall be kept on site for five (5) years and made available to the Division upon request.

The permittee shall maintain a log on-site to contemporaneously record the start and stop date of any engine replacement, the manufacturer, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.

2.1.1 The permittee may **temporarily** replace an existing compressor engine that is subject to the emission limits set forth in this permit with an engine that is of the same manufacturer, model, and horsepower or a different manufacturer, model, or horsepower as the existing engine without modifying this permit, so long as the emissions from the temporary replacement engine comply with the emission limitations for the existing permitted engine as determined in section 2.2. Measurement of emissions from the temporary replacement engine shall be made as set forth in section 2.2.

The permittee may temporarily replace a grandfathered or permit exempt engine or an engine that is not subject to emission limits without modifying this permit. In this circumstance, potential annual emissions of NO_x and CO from the temporary replacement engine must be less than or equal to the potential annual emissions of NO_x and CO from the original grandfathered or permit exempt engine or for the engine that is not subject to emission limits, as determined by applying appropriate emission factors (e.g. AP-42 or manufacturer's emission factors).

2.1.2 The permittee may **permanently** replace the existing compressor engine for the emission points specified in Table 1 with the manufacturer, model, and horsepower engines listed in Table 1 without modifying this permit so long as the emissions from the permanent replacement engine comply with the emission limitations for the existing permitted engine as determined in section 2.2. Measurement of emissions from the temporary replacement engine shall be made as set forth in section 2.2.

An Air Pollutant Emissions Notice (APEN) that includes the specific manufacturer, model and serial number and horsepower of the permanent replacement engine shall be filed with the Division for the permanent replacement engine within 14 calendar days of commencing operation of the replacement engine. The APEN shall be accompanied by the appropriate APEN filing fee and a cover letter explaining that the permittee is exercising an alternative operating scenario and is installing a temporary replacement engine.

This AOS cannot be used for permanent engine replacement of a grandfathered or permit exempt engine or an engine that is not subject to emission limits.

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The permittee shall agree to pay fees based on the normal permit processing rate for review of information submitted to the Division in regard to any permanent engine replacement.

Table 1

Emission Point	Replacement Engine	Periodic Monitoring	Stack Test	MACT Status
P104	Exact replacement of engine and associated control device	See Footnote 1	No	Facility not major for HAPS for RICE MACT applicability
EN001	Exact replacement of engine and associated control device	See Footnote 2	No	

¹ Monitoring is as specified in Section II.5 of this permit.

2.2 Portable Analyzer Testing

The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the replacement engine.

All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer) as found on the Division's website at: http://www.cdphe.state.co.us/ap/down/portanalyzeproto.pdf

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

If the portable analyzer results indicate compliance with both the NO_X and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NO_X or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NO_X and CO emission limitations or until the engine is taken offline.

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² Monitoring is as specified in Section II.6 of this permit.

2.3 Additional Sources

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not "routine replacement" of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOS-approved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.

3. Prevention of Significant Deterioration (PSD)

3.1 This facility is located in an area designated attainment for all pollutants. Based on the information provided by the applicant, it is not categorized as a major stationary source (no single criteria pollutant with a Potential to Emit of greater than 250 tons/yr) as of the issue date of this permit. The source therefore is not subject to the PSD review requirements of 40 CFR 52.21 (Colorado Regulation No. 3, Part D, Section VI). Any future modification to this facility, which is major by itself will result in the application of the PSD review requirements.

Future modifications to this facility may result in an exceedance of the major stationary source threshold. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase (see Colorado Regulation No. 3, Part D, Sections II.A.26 and 42) for any pollutant as listed in Colorado Regulation No. 3, Part D, Section II.A.42 or a modification which is major by itself may result in the application of the PSD review requirements.

3.2 The following Operating Permits are associated with this facility for purposes of determining applicability of Prevention of Significant Deterioration regulations: None

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

4.1 Based on the information provided by the applicant, the facility is not 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:

The CAM requirements do not apply to EN001 until the next renewal of this permit.

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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
P101	001	S101	Ingersoll-Rand Model 12-SVGA-1 Standard Rich Burn Internal Combustion Engine w/ Turbocharger, Site Rated 660 HP, Serial No. 12CS1375, Natural Gas Fired.	Uncontrolled
P103	003	S103	Ingersoll-Rand Model 6-SVG Standard Rich Burn Internal Combustion Engine, Site Rated 255 HP, Serial No. 6CS740, Natural Gas Fired.	Uncontrolled
P301/302	004/005	S301/302	Waukesha Model F-817GU Standard Rich Burn Internal Combustion Engines (2) Used to Drive an Electric Generator, Site Rated 80 HP, Serial Nos. 208609, 208610, Natural Gas Fired.	Uncontrolled
P501	006	S501	Black Sivalls Bryson 17.3 MMscfd Glycol Dehydration Unit, Serial No. 39035-S, Designed to Reduce Water Content to 5 lbs/MMscf.	Uncontrolled
T-260, T- 1093 & T- 1076	007	T-260, T- 1093 & T- 1076	Three (3) Condensate Storage Tanks, 400 bbl Capacity. Each tank has a separate vent line.	Uncontrolled
P104	008	S104	Ajax, Model No. DPC-2802LE, Low NO _X Design, Internal Combustion Engine, Site Rated 384 hp, Serial No. Unknown, Natural Gas Fired.	Uncontrolled
EN001	009	EN001	Waukesha, Model No. L7042G, Standard Rich Burn Internal Combustion Engine, Site Rated at 849 Hp, Serial No. 276908. Natural Gas Fired.	Non-Selective Catalytic Reduction Unit.
Dehy 02	010	Dehy 02	PEC, Model No. 12 MMSCFD, Triethylene Glycol Dehydrator, Serial No. 1177, Rated at 12 mmSCF/day.	Jadco, Model No. 460, S/N 00326, BTEX Condenser/ Combustor System

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SECTION II - Specific Permit Terms

1. Units P101 & 103 - Ingersoll-Rand Internal Combustion Engines

Parameter	Permit Condition Number	Limita Short Term	ations Long Term	Compliance Emission Factor	Monito Method	ring Interval
Emissions Calculation	1.1	N/A	N/A	NO _X - 16.0 g/hp-hr CO - 14.0 g/hp-hr VOC - 0.10 g/hp-hr	Calculation	Annually
Hours of Operation	1.2	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	1.3	Not to Exceed 20%		N/A	Fuel Restriction	Only Natural Gas is used as Fuel.

1.1 The emission factors listed above have been approved by the Division and shall be used to calculate emissions **from each engine** (Dresser-Rand Engine data). 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 1.2, in the following equation:

Tons/yr = EF (g/hp-hr) x maximum site-rate hp x hours of operation (hrs/yr) 453.6 g/lb x 2000 lbs/ton

- 1.2 Hours of Operation **for each engine** shall be monitored monthly and recorded in a log to be made available to the Division upon request. Recorded data shall be used to calculate emissions for determination of annual fees as specified in Condition 1.1 and to allocate fuel use as required by Conditions 5.2 and 6.2.
- 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). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed since natural gas is the only fuel 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.

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2. Units P301/302 - Waukesha Internal Combustion Engines Powering Electric Generator

Parameter	Permit	Limitations		Compliance Emission	Monitor	ring
	Condition Number	Short Term	Long Term	Factor	Method	Interval
Emissions Calculation	2.1	N/A	N/A	NO _X - 16.0 g/hp-hr CO – 13.1 g/hp-hr	Calculation	Annually
				VOC - 0.1 g/hp-hr		
Hours of Operation	2.2	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	2.3	Not to Exe	ceed 20%	N/A	Fuel Restriction	Only Natural Gas is Used as Fuel

2.1 The emission factors listed above have been approved by the Division and shall be used to calculate emissions from these units (Waukesha Product Bulletin #290 for NO_X and AP-42, Section 3.2 (dated 7/00), Table 3.2-3 (CO at < 90% load), for CO and VOC, converted to g/hp-hr based on an engine heat rate of 7756 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:

Tons/yr = EF (g/hp-hr) x maximum site-rate hp x hours of operation (hrs/yr) 453.6 g/lb x 2000 lbs/ton

- A log shall be maintained listing the dates and times of operation of each engine. This log should be updated on a monthly basis and be made available to the Division upon request. Recorded data shall be used to calculate emissions for determination of annual fees as specified in Condition 2.1 and to allocate fuel use as required by Condition 5.2 and 6.2. These engines shall not run simultaneously except during periods of transition of service from one engine to the other. Simultaneous operation shall not exceed one (1) hour during transition periods.
- 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 these engines. The permittee shall maintain records that verify that only natural gas is used as fuel in these engines.

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3. Unit P501 - Glycol Dehydration Unit

Parameter Permit		Limit	ations	Compliance	Monitoring	
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval
VOC	3.1	N/A	49.8 tons/year	Based on Input to GLYCalc Model Version 4.0 or Higher	Parametric	Monthly
Natural Gas Processed	3.2	N/A	6,314.5 MMscf per year	N/A	Flow Meter	Monthly
Extended Gas Analysis	3.3	N/A	N/A	N/A	ASTM Methods	Annually
Days/Hours of Operation	3.4	N/A	N/A	N/A	Recordkeeping	Monthly

- 3.1 Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit 95MF187, as modified under the provisions of Section I, Condition 1.3). VOC emissions shall be calculated monthly using the Gas Research Institute's GLYCalc Model, Version 4.0 or higher. Monitoring of the following parameters to be entered into the GLYCalc Model shall be monitored monthly: triethylene glycol circulation rate and inlet (wet) gas pressure and temperature. Monthly values of parameters shall be representative of the unit's operation during the month. Monthly VOC emissions shall be calculated by the end of the subsequent month. Monthly VOC emissions shall be used in a rolling twelve month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.
- 3.2 The gas processed by the glycol dehydration unit shall not exceed the limitations listed above (Colorado Construction Permit 95MF187, as modified 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 limitations. An average daily gas throughput rate shall be determined by dividing the monthly gas throughput by the number of operating days in the previous month. This average daily gas throughput rate shall be used in the monthly GLYCalc runs required by Condition 3.1.
- 3.3 Samples of inlet gas shall be collected and analyzed (extended gas analysis) annually to determine C₁ to C₆, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition. If any of the analyses indicates the BTEX or n-Hexane constituent concentrations exceed the values listed in the table below, frequency of extended gas analyses will increase to quarterly (analyses not less than one (1) month apart). Frequency will remain quarterly until analyses indicate that the BTEX and n-Hexane constituent concentrations meet the comparison criteria for four consecutive analyses, at which time required frequency will return to annual.

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Constituent	Value	Units	Criteria
Benzene	73	parts per million	At or Below
Toluene	60	parts per million	At or Below
Ethyl Benzene	2	parts per million	At or Below
Xylene	11	parts per million	At or Below
n-Hexane	519	parts per million	At or Below

3.4 Days and hours of operation shall be monitored and recorded monthly in a log that is to be made available to the Division upon request. Days of operation shall be used to calculate an average daily gas throughput as specified in Condition 3.2. Hours of operation for the month shall be used in the GLYCalc runs required by Condition 3.1.

4. Units T-260, T-1093 and T-1076 - Condensate Storage Tanks

Parameter	Permit	Limitations		Compliance	Monito	oring
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval
VOC Emissions	4.1	N/A	N/A	API E & P Tanks Version 2.0 or Higher	Calculation	Annually
E & P Tanks Input Parameters	4.2	N/A	N/A	N/A	Recordkeeping and Analysis	Monthly (Records) Annually (Analysis)
Condensate Produced	4.3	N/A	N/A	N/A	Recordkeeping	Annually
Sales Condensate Analysis	4.4	N/A	N/A	N/A	Analytical Methods	Annually

- 4.1 Annual (calendar year) emissions for purposes of APEN reporting and payment of annual fees shall be calculated using API's E & P Tanks Version 2.0. Annual emissions shall be calculated using the input parameters specified in Condition 4.2, the annual quantity of condensate sold and the sales oil properties as determined by Condition 4.4.
- 4.2 The input parameters to E & P Tanks shall be monitored as follows:
 - 4.2.1 The separator temperature and pressure shall be monitored and recorded monthly. Monthly values shall be representative of the unit's operation during the month. The recorded values in each month for the separator temperature and pressure shall be averaged and used to calculate annual emissions as required by Condition 4.1.

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- 4.2.2 For purposes of calculating emissions as required by Condition 4.1, for ambient temperature the permittee shall use the historical annual mean temperature recorded at Denver International Airport (DIA).
- 4.2.3 The permittee shall sample and analyze the low pressure oil annually for the compositional E & P Tanks input requirements. The permittee shall sample and analyze fluids annually for the compositional E & P Tanks input requirements. A copy of the procedures used to obtain and analyze samples shall be maintained and made available to the Division upon request.
- 4.3 The quantity of condensate sold shall be monitored and recorded annually and used to calculate emissions as required by Condition 4.1.
- 4.4 The sales condensate shall be analyzed as follows:
 - 4.4.1 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 4.1.
 - 4.4.2 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 4.1.

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Renewed: 8/1/04

5. Unit P104 – Ajax 2802LE Natural Gas Fired Engine, Low NO_X Design

Parameter	Permit	Limitations		Compliance Emission	Monitor	ing
	Condition Number	Short Term	Long Term	Factor	Method	Interval
NO _X	5.1	N/A	7.4 tons/yr	0.63 lbs/mmBTU	Recordkeeping, and Calculation	Monthly
СО		N/A	4.4 tons/yr	0.38 lbs/mmBTU	Portable Monitoring	Quarterly
VOC		N/A	4.4 tons/yr	0.38 lbs/mmBTU		
Natural Gas Consumption	5.2	N/A	21.9 mmSCF per year	N/A	Fuel Meters	Monthly
BTU Content of Natural Gas	5.3	N/A	N/A	N/A	ASTM Methods	Semi- Annually
Opacity	5.4.	Less Than or Equal to 20%		N/A	Fuel Restriction	Only Natural Gas is Used as Fuel
Hours of Operation	5.5.	N/A	N/A	N/A	Recordkeeping	Monthly

- Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compounds emissions shall not exceed the limitations stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested emissions identified in the APEN filed by the source on September 14, 2005). Compliance with the emission limitations shall be monitored as follows:
 - 5.1.1 Except as provided for below, the emission factors listed above (manufacturer's emission factors, converted to lbs/mmBtu based on a calculate engine heat rate of 6,966 Btu/hp-hr as indicated in the September 14, 2005 application) have been approved by the Division and shall be used to calculate emissions from this engine. Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly natural gas consumption and the lower heating value of the fuel in the equation below:

 $tons/mo = \underline{EF (lbs/mmBtu) \ x \ fuel \ use \ (mmSCF/mo) \ x \ lower \ heating \ value \ of \ fuel \ (mmBtu/mmSCF)} } 2000 \ lbs/ton$

Monthly emissions 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.

If the results of the portable analyzer testing conducted under the provisions of Condition 5.1.2 show that either the NO_X or CO emission rates/factors are greater than those listed above, and in the absence of subsequent testing results to the contrary (as approved by the

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Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rates/factors within 60 days of the completion of the test.

- 5.1.2 Portable Monitoring shall be conducted quarterly in accordance with the requirements in Condition 8.
- Natural Gas consumption from this engine shall not exceed the limitations listed above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part B, Section II.A.6 and Part C, Section X, based on the requested fuel use in the APEN filed by the source on September 14, 2005). On the first working day of each month, facility-wide natural gas use shall be recorded using existing fuel meter(s). Allocation of natural gas use to this engine will be based on the engine size and hours of operation. The natural gas use shall be measured no more than one (1) hour from the time that run time hours have been recorded. Monthly natural gas consumption shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.
- 5.3 The Btu content of the natural gas used to fuel this engine shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis.
- 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 A.II.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity requirement will be presumed since only natural gas is permitted to be used as fuel in this engine.
- 5.5 Hours of operation shall be monitored and recorded monthly. Hours of operation shall be used to allocate fuel use as required by Conditions 5.2 and 6.2.
- 5.6 This engine shall be operated and maintained in accordance with manufacturer's recommendations and good engineering practices at all times, including periods of start-up, shutdown, and malfunction.

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6. EN001 - Waukesha 849 HP Internal Combustion Engine, Equipped with NSCR

Parameter	Permit	Limitations		Compliance	Monitoring	
	Condition Number	Short Term Lo	ong Term	Emission Factor	Method	Interval
NO_X	6.1.	N/A	8.2 tons/yr	0.25 lb/mmBtu	Recordkeeping and Calculation	Monthly
СО		N/A	8.2 tons/yr	0.25 lb/mmBtu	Portable Monitoring	Quarterly
VOC	1	N/A	4.1 tons/yr	0.13 lb/mmBtu	1	
Natural Gas Consumption	6.2	N/A	59.5 mmSCF/yr	N/A	Fuel Meters	Monthly
Hours of Operation	6.3.	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	6.4.	Less than or Equal to 20%		N/A	Fuel Restriction	Only Natural Gas is Used as Fuel
BTU Content	6.5.	N/A	N/A	N/A	ASTM Methods	Semi-Annually
Air to Fuel Ratio Controller and Catalyst Parameters	6.6.	N/A	N/A	N/A	Recordkeeping	Monthly
Oxygen Concentration in Exhaust	6.7.	N/A	N/A	N/A	Portable Flue Gas Analyzer	Quarterly

- 6.1 Nitrogen Oxide (NO_X), Carbon Monoxide (CO) and Volatile Organic Compound (VOC) emissions from this engine shall not exceed the limitations stated above (Colorado Construction Permit 04MF0936). Compliance with the emission limits shall be monitored as follows:
 - 6.1.1 The emission factors listed above (from manufacturer, converted to lbs/mmBtu based on 849 hp and an engine heat input rate of 7.43 mmBtu/hr) have been approved by the Division and shall be used to calculate emissions from this engine, except as provided for below.

Monthly emissions shall be calculated by the end of the subsequent month using the above emission factor, the monthly fuel consumption and the heating value of the fuel in the equation below:

 $tons/month = \underbrace{[EF (lbs/mmBtu) \ x \ fuel \ usage \ (mmSCF/month) \ x \ heat \ content \ of \ fuel \ (mmBtu/mmSCF)]}_{2000 \ lbs/ton}$

A twelve month rolling total of emissions will be maintained to monitor compliance with the annual emission limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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If the results of the portable analyzer testing conducted under the provisions of Condition 6.1.2 show that either the NO_X or CO emission rates/factors are greater than those listed above, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rates/factors within 60 days of the completion of the test.

- 6.1.2 Portable Monitoring shall be conducted quarterly in accordance with the requirements in Condition 8.
- Natural Gas Consumption for this engine shall not exceed the limitations stated above (Colorado Construction Permit 04MF0936). On the first working day of each month, facility-wide natural gas use shall be recorded using existing fuel meter(s). Allocation of natural gas use to this engine will be based on the engine size and hours of operation. The natural gas use shall be measured no more than one (1) hour from the time that run time hours have been recorded. Monthly natural gas consumption shall be used in a twelve month rolling total to monitor compliance with the annual limitation. Each month, a new twelve month total shall be calculated using the previous twelve months data.
- 6.3 Hours of Operation shall be monitored monthly and recorded and maintained to be available to the Division upon request. Hours of operation shall be used to allocate fuel use as required by Conditions 5.2 and 6.2.
- 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 (Construction Permit 04MF0936 and 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.
- 6.5 The Btu content of the natural gas used to fuel this engine shall be verified semi-annually using the appropriate ASTM Methods or equivalent, if approved in advance by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions shall be made using the heat content derived from the most recent required analysis.
- 6.6 Parameters associated with the air-to-fuel ratio controller (AFR) and non-selective catalyst reduction unit shall be monitored as follows:
 - 6.6.1 The millivolt reading (AFR) will be monitored and recorded monthly to assess the air to fuel ratio controller operating condition. Recording of the millivolt reading shall be used to verify that the AFR controller is operated in accordance with the manufacturer's recommendations.
 - 6.6.2 The pressure drop across the catalyst shall be monitored and recorded monthly.

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6.6.3 The catalyst inlet temperature shall be monitored and recorded monthly and kept within the manufacturer's specified range. The manufacturer's recommendations on the catalyst inlet temperature shall be made available to the Division upon request.

When portable monitoring is scheduled, the above parameters shall be recorded during the portable monitoring event.

- 6.7 The oxygen concentration in the engine exhaust gas shall be measured and recorded during each portable monitoring event required by Condition 6.1.2.
- 6.8 This engine shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and good engineering practices, at all times, including periods of start-up, shut-down and malfunction.

7. Unit Dehy 02 – PEC Triethylene Glycol Dehydration Unit, Equipped with BTEX Condenser/Combustor

Parameter	Permit	Limitations		Compliance	Monitoring	
	Condition Number	Short Term	Long Term	Emission Factor	Method	Interval
VOC	7.1	N/A	0.5 tons/year	Based on Input to GLYCalc Model Version 4.0 or Higher	Parametric	Daily, Monthly
GLYCalc Paramters	7.2.	Glycol Circulation Rate: 107 gal/hr (1.79 gpm)	N/A	N/A	Recordkeeping	Daily
Natural Gas Processed	7.3	N/A	4,380 mmSCF per year	N/A	Flow Meter	Monthly
Extended Gas Analysis	7.4	N/A	N/A	N/A	ASTM Methods	Quarterly
Dehydrator Regenerator (Still) Vent Requirements	7.5.	Emissions shall be Routed to Condenser/Combustor that Achieves 95% Reduction in VOC Emissions		N/A	See Condition 7.5.	
Days/Hours of Operation	7.6	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	7.7.	Less than or Equal to 20%		N/A	Fuel Restriction	Only Natural Gas is Processed

7.1 Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit 05MF0429, as modified under the provisions of Section I, Condition 1.3 to reflect requested emissions indicated on the APEN submitted on September 20, 2006). VOC

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emissions shall be calculated monthly using the Gas Research Institute's GLYCalc Model, Version 4.0 or higher. Monitoring of the GLYCalc parameters shall be conducted as follows:

- 7.1.1 Inlet gas pressure and temperature shall be monitored and recorded monthly;
- 7.1.2 The triethylene glycol circulation rate shall be monitored and recorded daily;
- 7.1.3 The condenser outlet temperature shall be monitored and recorded daily.

Recorded values of parameters shall be representative of the unit's operation during the day and/or month. A monthly average shall be calculated for the parameters that are recorded daily. The monthly recorded values and monthly calculated averages shall be used monthly in GLYCalc runs to calculate monthly VOC emissions. Monthly VOC emissions shall be calculated by the end of the subsequent month. Monthly VOC emissions shall be used in a rolling twelve month total to monitor compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

Note that for any month in which there were uncontrolled emissions from the dehydrator due to combustor downtime, those emissions (as required by Condition 7.5) shall be included in the emissions for that month for use in the rolling twelve month totals.

- 7.2 The lean glycol circulation rate shall not exceed the above limitations (Colorado Construction Permit 05MF0429). Daily recorded values of the glycol circulation rate (as required by Condition 7.1.2) shall be compared to the limitation to assess compliance with this requirement.
- 7.3 The gas processed by the glycol dehydration unit shall not exceed the limitations listed above (Colorado Construction Permit 05WE0429). 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 limitations. An average daily gas throughput rate shall be determined by dividing the monthly gas throughput by the number of operating days in the previous month. This average daily gas throughput rate shall be used in the monthly GLYCalc runs required by Condition 7.1.
- 7.4 Samples of inlet gas shall be collected and analyzed (extended gas analysis) quarterly to determine C₁ to C₆, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition. Frequency of extended gas analyses shall move to semi-annually after the first year, then to annually after the second year if the BTEX and n-hexane concentrations remain consistently below the established values as identified in the table below. Frequency will revert back to quarterly if any of the BTEX or n-hexane constituents exceed the listed values. The first quarterly sample shall be taken three months after the sample that indicated that a BTEX or n-hexane constituent exceeded the parameters in the above table was taken.

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Constituent	Value	Units	Criteria
Benzene	28	parts per million	At or Below
Toluene	29	parts per million	At or Below
Ethyl Benzene	1	parts per million	At or Below
Xylene	9	parts per million	At or Below
n-Hexane	30	Parts per million	At or Below

7.5 Emissions from the dehydrator regenerator (still) vent and flash tank vent shall be routed through a closed vent system to the condenser/combustor prior to being emitted. The condenser/combustor shall be capable of reducing VOC emissions by 95% or greater. The dehydration unit shall not be in operation if a flame is not present in the combustor. The combustor shall be equipped with a heat sensing monitoring device, equipped with an alarm that indicates no ignition of the pilot flame. Records of the times and duration of all pilot flame outages, and estimated emissions shall be maintained and made available to the Division upon request. Estimated emissions shall be used in assessing compliance with the annual emission limitations as specified in Condition 7.1.

In the absence of credible evidence to the contrary, compliance with the 95% reduction requirement shall be presumed provided the requirements in this condition are met and a control efficiency of 95% may be used in the GLYCalc runs specified in Condition 7.1 to determine VOC emissions.

Note that if there are any uncontrolled emissions during a month due to combustor down time, no credit may be taken for the combustor for those hours. Emissions during those periods shall be included in the emission calculations required by Condition 7.1.

- 7.6 Days and hours of operation shall be monitored and recorded monthly in a log that is to be made available to the Division upon request. Days of operation shall be used to calculate an average daily gas throughput as specified in Condition 7.3. Hours of operation for the month shall be used in the GLYCalc runs required by Condition 7.1.
- 7.7 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 (Construction Permit 05MF0429 and 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 processed in the dehydrator and therefore only natural gas is burned in the combustor.

8. Portable Monitoring (6/1/06 version)

Emission measurements of nitrogen oxides (NO_X) and carbon monoxide (CO) shall be conducted quarterly using a portable flue gas analyzer. At least one calendar month shall separate the quarterly tests. Note that if the engine is operated for less than 100 hrs in any quarterly period, then the portable monitoring requirements do not apply.

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All portable analyzer testing required by this permit shall be conducted using the Division's Portable Analyzer Monitoring Protocol (ver March 2006 or newer) as found on the Division's website at: http://www.cdphe.state.co.us/ap/down/portanalyzeproto.pdf

Results of the portable analyzer tests shall be used to monitor the compliance status of this unit. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

If the portable analyzer results indicate compliance with both the NO_X and CO emission limitations, in the absence of credible evidence to the contrary, the source may certify that the engine is in compliance with both the NO_X and CO emission limitations for the relevant time period.

Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, if the portable analyzer results fail to demonstrate compliance with either the NO_X or CO emission limitations, the engine will be considered to be out of compliance from the date of the portable analyzer test until a portable analyzer test indicates compliance with both the NO_X and CO emission limitations or until the engine is taken offline.

For comparison with the emission rates/factors, the emission rates/factors determined by the portable analyzer tests and approved by the Division shall be converted to the same units as the emission rates/factors in the permit. If the portable analyzer tests shows that either the NO_X or CO emission rates/factors are greater than the relevant ones set forth in the permit, and in the absence of subsequent testing results to the contrary (as approved by the Division), the permittee shall apply for a modification to this permit to reflect, at a minimum, the higher emission rate/factor within 60 days of the completion of the test.

Results of all tests conducted shall be kept on site and made available to the Division upon request.

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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 & Number	Non-Applicable Requirement	Justification
Entire Facility	40 CFR Part 60 Subpart KKK - New Source Performance Standards for Equipment Leaks at Natural Gas Processing Plants, as adopted by reference in Colorado Regulation No. 6, Part A.	The facility is not a natural gas processing plant.
Entire Facility	40 CFR Part 63 Subpart HH as adopted by reference in Colorado Regulation No. 8, Part E, Section III - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities	Based on the information provided by the applicant and available to the Division the facility is not a major source of hazardous air pollutants as determined in accordance with the requirements of 40 CFR Part 63 Subpart HH.

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;

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- 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 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.

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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.

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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

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circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

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

d. Upset Conditions and Breakdowns

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

e. Circumvention Clause

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

f. Compliance Certifications

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

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);

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- (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.

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- 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 upset provision contained in any applicable requirement.

6. Emission Standards for Asbestos

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

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

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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.

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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.

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b. Applications for renewal shall be submitted at least twelve months, but not more than 18 months, prior to the expiration of the Operating Permit. An application for permit renewal may address only those portions of the permit that require revision, supplementing, or deletion, incorporating the remaining permit terms by reference from the previous permit. A copy of any materials incorporated by reference must be included with the application.

20. Portable Sources

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

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

21. Prompt Deviation Reporting

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

The permittee shall promptly report any deviation from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken.

"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:

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- (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

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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.

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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.

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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.

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APPENDIX A - Inspection Information

Directions to Plant:

The Facility is located on the north side of Shell Creek off a dirt road running between the towns of E. Hiawatha and Powder Wash. This dirt road can be accessed from Craig, CO by following Colorado Highway 13 approximately 2 miles west of town, then turning north (toward Great Divide) when CO 13 branches South. Continue on this road (will turn from paved to dirt) through the towns of Great Divide and Powder Wash on to E. Hiawatha.

Safety Equipment Required:

Hard Hat Safety Shoes Hearing Protection

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on March 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:

Unit ID	Description
P401	Line Heater #1 - 0.5 MMBtu/hr
P402	Line Heater #2 - 0.75 MMBtu/hr
P403	Small Water Tank Heater - 0.25 MMBtu/hr
P404	Large Water Tank Heater - 0.25 MMBtu/hr
P405	Glycol Dehydration Reboiler Burner - 0.5 MMBtu/hr
T601	Methanol Storage Tank
N/A	Miscellaneous Landscaping/Housekeeping Devices
N/A	Storage of Miscellaneous Chemicals for O&M
N/A	Natural Gas Emissions during Startup/Shutdown
F701	Fugitive Emissions from Equipment Leaks
N/A	Condensate Truck Loading Equipment (VOC < 2 tons/yr)
Dehy01	Hiawatha Deep Glycol Dehydrator Reboiler – $0.375~\text{MMBtu/hr}$

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APPENDIX B

Reporting Requirements and Definitions

with codes ver 6/1/06

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

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

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

For purposes of this operating permit, the Division is requiring that the permit deviation reports are 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.

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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 no 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 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

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

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

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

were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

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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. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods

Startup, Shutdown, and Malfunctions

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

Emergencies and Upsets

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

DEFINITIONS

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

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

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

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

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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 upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EERs or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Questar Gas Managem	ent Company – East Hiawatha Compressor Station
OPERATING PERMIT NO: 950PMF040	
REPORTING PERIOD:	(see first page of the permit for specific reporting period and dates)

Operating		Devia Noted I Perio	During	Deviation Code ²	Condition	nergency Reported Period?
Permit Unit ID	Unit Description	YES	NO		YES	NO
P101	Ingersoll-Rand Internal Combustion Engine w/Turbocharger, Site Rated 660 HP, S/N: 12CS1375					
P103	Ingersoll-Rand Internal Combustion Engine, Site Rated 255 HP, S/N:6CS740.					
P301/302	Waukesha Internal Combustion Engines (2), Each Site Rated 80 HP, S/N: 208609 and 208610.					
P501	Black Sivalls Bryson Glycol Dehydration, Model and S/N: Unknown					
T-260, T-1093 & T-1076	Three (3) Condensate Storage Tanks, 400 bbl Capacity. Each tank has a separate vent line.					
P104	Ajax, Model No. DPC-2802LE, Low NO _X Design, Internal Combustion Engine, Site Rated 384 hp, Serial No. Unknown, Natural Gas Fired.					
EN001	Waukesha, Model No. L7402G, Standard Rich Burn Internal Combustion Engine, Site Rated at 849 hp, Serial No. 276908, Natural Gas Fired.					
Dehy 02	PEC, Model No. 12 MMSCFD, triethylene glycol dehydration unit, Serial No. 1177. Rated at 12 MMscf/day. Equipped with a condenser/combustor to reduce VOC emissions.					
	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.

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

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²Use the following entries as appropriate:

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

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Monitoring and Permit Deviation Report - Part II

OPERATING PERMIT NO: 950PMF040 REPORTING PERIOD:	ipany – East Hi	awatha Compressor	Station
Is the deviation being claimed as an:	Emergency	Upset	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup Normal Opera		Malfunction
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 P	<u>roblem</u>		
Dates of Upsets/Emergencies Reported (if applicable	<u>e)</u>		
Deviation Code	Division Code	QA:	

SEE EXAMPLE ON THE NEXT PAGE

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EXAMPLE

REPORTING PERIOD: 1/1/96 - 6/30/96			
Is the deviation being claimed as an:	Emergency	Upset XX	N/A
(For NSPS/MACT) Did the deviation occur during:	Startup Shut Normal Operation _		Malfunction
OPERATING PERMIT UNIT IDENTIFICATION:			
Asphalt Plant with a Scrubber for Particulate Control	ol - 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 Pro	<u>blem</u>		
Replaced Line Filter			
Dates of Upsets/Emergencies Reported (if applicable	<u>e)</u>		
4/10/96 to S. Busch, APCD			
Deviation Code	Division Code QA:		_

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Monitoring and Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Questar Gas Management Company – East Hi	nawatha Compressor Station
FACILITY IDENTIFICATION NUMBER: 0810076	
PERMIT NUMBER: 950PMF040	
REPORTING PERIOD: (see first page of the	permit for specific reporting period and dates)
All information for the Title V Semi-Annual Deviation Reports defined in Colorado Regulation No. 3, Part A, Section I.B.38. packaged with the documents being submitted.	• •
STATEMENT OF COMPLETENESS	
I have reviewed the information being submitted in its ent formed after reasonable inquiry, I certify that the statements are true, accurate and complete.	•
Please note that the Colorado Statutes state that any person v 1-501(6), C.R.S., makes any false material statement, represe guilty of a misdemeanor and may be punished in accordar 122.1, C.R.S.	entation, or certification in this application is
Printed or Typed Name	Title
Signature of Responsible Official	Date Signed
Note: Deviation reports shall be submitted to the Division at the address be sent to the U.S. EPA.	s given in Appendix D of this permit. No copies need

First Issued: 2/1/98 Renewed: 8/1/04 Last Revised: 11/7/06

APPENDIX C

Required Format for Annual Compliance Certification Reports

OPERA	ITY NAME: Questar Gas Management Cor ATING PERMIT NO: 950PMF040 ATING PERIOD:	npany – Ea	st Hiawat	tha Com	pressor	r Station	
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.							
Operati ng Permit	Unit Description	Deviations Reported ¹		Monito Method Perm	d per	Was Con Continu Interm	uous or
Unit ID		Previous	Current	YES	NO	Continuous	Intermittent

Operati ng Permit	ng Permit		Deviations Reported ¹		oring d per it? ²	Was Compliance - Continuous or Intermittent? ³	
Unit ID		Previous	Current	YES	NO	Continuous	Intermittent
P101	Ingersoll-Rand Internal Combustion Engine w/Turbocharger, Site Rated 660 HP, S/N: 12CS1375						
P103	Ingersoll-Rand Internal Combustion Engine, Site Rated 255 HP, S/N:6CS740.						
P301/ 302	Waukesha Internal Combustion Engines (2), Each Site Rated 80 HP, S/N: 208609 and 208610.						
P501	Black Sivalls Bryson Glycol Dehydration, Model and S/N: Unknown						
T-260, T-1093 & T- 1076	Three (3) Condensate Storage Tanks, 400 bbl Capacity. Each tank has a separate vent line.						
P104	Ajax, Model No. DPC-2802LE, Low NO _X Design, Internal Combustion Engine, Site Rated 384 hp, Serial No. Unknown, Natural Gas Fired.						

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Operati ng Permit	Unit Description	Deviations Reported ¹						d per	Was Con Contin Interm	uous or
Unit ID		Previous	Current	YES	NO	Continuous	Intermittent			
EN001	Waukesha, Model No. L7042G, Standard Rich Burn Internal Combustion Engines, Site Rated at 849 hp, Serial 276908. Natural Gas Fired.									
Dehy 02	PEC, Model No. 12 MMSCFD, Triethylene Glycol Dehydrator, Serial No. 1177, Rated at 12 mmSCF/day. Equipped with the condenser/combustor system to reduce VOC emissions.									
	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.

NOTE:

The Periodic Monitoring requirement 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 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 a 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.

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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.

³Note whether the compliance status with 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.

⁴ Compliance status for these sources shall be based on a reasonable inquiry using readily available information.

II.	Statu A.	s for Accidental Release Prevention Program: This facility is subject is not subject to the provis Prevention Program (Section 112(r) of the Federal Clean Air Act)	ions of the Accidental Release
	B.	If subject: The facility is is not in compliant section 112(r).	ce with all the requirements of
		A Risk Management Plan will be has been authority and/or the designated central location by the requirement.	** *
III.	Certi	fication	
Color	ado Re	ion for the Annual Compliance Certification must be certified by a regulation No. 3, Part A, Section I.B.38. This signed certification does to being submitted.	•
reaso	nable i	ewed this certification in its entirety and, based on informat inquiry, I certify that the statements and information contained d complete.	
C.R.S	., mak	that the Colorado Statutes state that any person who knowingly ses any false material statement, representation, or certification is or and may be punished in accordance with the provisions of § 25	n this document is guilty of a
		Printed or Typed Name	Title
		Signature	Date Signed
		compliance certifications shall be submitted to the Air Pollution tal Protection Agency at the addresses listed in Appendix D of this Pe	

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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-T U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 300 Denver, CO 80202

Permit Modifications, Off Permit Changes:

Office of Partnerships and Regulatory Assistance Air and Radiation Programs, 8P-AR U.S. Environmental Protection Agency, Region VIII 999 18th Street, Suite 300 Denver, CO 80202

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APPENDIX E

Permit Acronyms

Listed Alphabetically:

SCC -

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
CCC	

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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
December 30, 2005	Minor Modification	General	The Reg 3 citations were revised throughout the permit, as necessary, based on the recent revisions made to Reg 3.
		Emission Changes	The new Ajax engine (permitted emissions of NO_X - 7.4 tpy, CO – 4.4 tpy and VOC – 4.4 tpy) is replacing an existing unit (P102). Therefore, this modification results in a decrease in NO_X and CO emissions of 77.6 and 70 tpy, respectively and an increase in VOC emissions of 3.9 tpy.
		Section I	The table in Condition 6.1 was revised to include the new engine and to note that Unit P102 (Ingersoll-Rand 550 hp engine) would be removed from service prior to commencing operation of the new engine.
		Section II.4	Added a note to Condition 4.1 indicating that monthly E & P Tanks runs will report annual emissions and that monthly emissions shall be based on annual emissions from the monthly E & P Tanks runs multiplied by the number of days in the month divided by the number of days in the year. Revised Condition 4.2.3 to require the source to sample low pressure oil annually.
		Section II.5	Added Conditions for the new engine.
		Section III	The citation in the permit shield was corrected and revised to reflect the revisions to Reg 3. The references to Part C, Section V.C.1.b and C.R.S. 25-7-111(2)(I) were removed, since they did not address the permit shield.
		Appendices B and C	Replaced Appendices B and C with revised appendices. Included the new engine in the tables.
November 7, 2006	Minor Modification	Emission Change	Permitted Emission Increases of NO_X – 8.2 tpy, CO 8.2 tpy and VOC 4.4 tpy.
		Section I	Revised Condition 1.1 to address the Hiawatha Deep equipment and to clarify that all engines burn natural gas as fuel. Revised the language in Condition 1.4 to reflect that only the last paragraph of Section IV, Condition 3.g is state-only. Some of the citations in Condition 3.1 (PSD) were revised based on revisions made to Regulation No. 3. Added language to Condition 5.1 to indicate the CAM status of EN001 and added the Hiawatha Deep equipment to and removed engine P102 from the table in Condition 6.1.
		Section II.1	Removed engine P102. Revised the language in Condition 1.2 to indicate that hours of operation are used to allocate fuel use. Based on EPA's response to a petition on another Title V operating permit, minor language changes were made to various permit conditions (both in the table and the text) to clarify that only natural gas is used as fuel in these engines.
		Section II.2	Revised the language in Condition 2.2 to indicate that hours of operation are used to allocate fuel use. Based on EPA's response to a petition on another Title V operating permit, minor language changes were made to various permit conditions (both in the table and the text) to clarify that only natural gas is used as fuel in these engines.

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DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
November 7, 2006	Minor Modification	Section II.4	Revised the language in conditions 4.1 and 4.2 to require that emissions from condensate tanks be calculated annually using the average annual temperature in the E & P tank runs.
		Section II.5	Based on EPA's response to a petition on another Title V operating permit, minor language changes were made to various permit conditions (both in the table and the text) to clarify that only natural gas is used as fuel in these engines. Revised Condition 5.3 to specify that the higher heating value be used in emission calculations. The portable monitoring language was revised to latest version and moved to "new" condition 8. Removed Conditions 5.5, 5.6, 5.7 and 5.8, these actions were completed. Added a condition to record hours of operation to allocate fuel use among engines.
		Section II.6	Added conditions for Hiawatha Deep engine.
		Section II.7	Added conditions for Hiawatha Deep dehydrator
		Section III	Revised the justification of the NSPS KKK requirements (not a gas processing plant).
		Section IV	Removed the statement in Condition 3.g (affirmative defense provisions) addressing EPA approval and state-only applicability. The EPA has approved the affirmative defense provisions, with one exception and the exception, which is state-only enforceable is identified in Section I, Condition 1.4. Revised Condition 21 to include the definition of prompt in 40 CFR Part 71. Replaced the phrase "enhanced monitoring" with "compliance assurance monitoring" in Condition 22.d.
		Appendices	Added Hiawatha Deep dehydrator reboiler to the insignificant activities list (Appendix A). Replaced Appendices B and C with latest versions. Added the Hiawatha Deep equipment and removed engine P102 from the tables in Appendices B and C.

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