Colorado Department of Public Health and Environment

OPERATING PERMIT

CANYON GAS RESOURCES, INC.
FOUNDATION CREEK GAS PLANT

ISSUED NOVEMBER 1, 1999
LAST REVISED OCTOBER 31, 2001

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Foundation Creek Gas Conditioning Plant	OPERATING PERMIT NUMBER
FACILITY ID:	1030020	**95OPRB017**
ISSUE DATE:	November 1, 1999	
EXPIRATION DATE:	November 1, 2004	
MODIFICATIONS:	See Appendix F of Permit	

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

ISSUED TO:

Canyon Gas Resources, Inc.
8080 North Central Expressway, Suite 900
Dallas, TX 75206

PLANT SITE LOCATION:

Section 25, T4S, R102W
Rangely, Rio Blanco County

INFORMATION RELIED UPON

Operating Permit Application Received:	December 30, 1994
And Additional Information Received:	August 1, 1995

Nature of Business:	Gas gathering and natural gas liquids production
Primary SIC:	1321

RESPONSIBLE OFFICIAL

Name:	Danny L. Thompson
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FACILITY CONTACT PERSON

Name:	Andrea McMillen
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SUBMITTAL DEADLINES

Semi-Annual Monitoring Period:	April - September, October - March
Semi-Annual Monitoring Report:	November 1, 2001 & May 1, 2002 and subsequent years
Annual Compliance Period:	Begins April 1 through March 31
Annual Compliance Certification:	May 1, 2002 and subsequent years

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 The Foundation Creek Gas Conditioning Plant is a natural gas processing plant designed to compress natural gas and separate moisture and natural gas liquids from the gas stream prior to transmission to sales pipelines. The plant equipment includes a natural gas-fired turbine driven compressor and natural gas liquids recovery facilities. The natural gas liquids recovery facilities include a propane refrigeration system, a glycol dehydration unit and natural gas liquids storage and loading facilities.

The facility is located in a rural area south of Rangely in Rio Blanco County. The area in which the plant operates is designated as attainment for all criteria pollutants. The plant is located within 50 miles of the state of Utah.

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

1.3 This Operating Permit incorporates the applicable requirements contained in the underlying construction permits, and does not affect those applicable requirements, except as modified during review of the application or as modified subsequent to permit issuance using the modification procedures found in Regulation No. 3, Part C. These Part C procedures meet all applicable substantive New Source Review requirements of Part B. Any revisions made using the provisions of Regulation No. 3, Part C shall become new applicable requirements for purposes of this operating permit and shall survive reissuance. This Operating Permit incorporates the applicable requirements (except as noted in Section II) from the following Colorado Construction Permit(s): 84RB304, 95RB422, 95RB617-1, 95RB617-2 and 95RB617-3.

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

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

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

2. Alternative Operating Scenarios

2.1 Turbine Replacement

The following Alternative Operating Scenario (AOS) for temporary combustion turbine 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 has been

found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a construction permit for any combustion turbine replacement performed in accordance with this AOS, and the permittee shall be allowed to perform such turbine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

For purposes of Regulation No. 3, Part B, Section IV.G.4.a., any turbine replacement authorized under this AOS shall commence operation upon notation of same in the contemporaneous log as required below. Results of any testing required below shall be normalized for comparison to the applicable permitted emission limits.

2.1.1 Temporary Turbine Replacement

The following alternative operating scenario is incorporated into this permit in order to deal with a turbine breakdown or periodic routine maintenance and repair which requires the temporary replacement of the entire turbine. "Temporary" is defined as in the same service for 270 operating days or less in any 12 month period. The 270 days is the total number of days that the turbine is in operation. If the turbine operates only part of a day, that day counts towards the 270 day total. Note that the compliance demonstrations made as part of this AOS are in addition to any compliance demonstrations required by the permit.

2.1.1.1 The permittee may temporarily replace an existing turbine provided such replacement turbines are Solar Centaur T-3550 combustion turbines without modifying this permit. The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the temporary replacement turbine using a portable flue gas analyzer within seven (7) operating days of commencing operation of the temporary replacement turbine. Calibration of the analyzer shall be conducted according to manufacturer=s instructions.

In the absence of credible evidence to the contrary, results of the portable flue gas analyzer test shall be evidence of enforceable compliance or noncompliance of the temporary replacement turbine with the emission limitations of the original turbine.

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable flue gas analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 operating days of commencing operation of the replacement turbine. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the temporary replacement turbine will be considered to be in compliance for purposes of this AOS from the time that the

replacement turbine commenced operation until the replacement turbine is taken off line.

If portable flue gas analyzer results fail to indicate the compliance with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. In the absence of credible evidence to the contrary, the temporary replacement turbine will be considered to be out of compliance from the time that the temporary replacement turbine commenced operation until the turbine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period.

2.1.1.2 The permittee may temporarily replace a grandfathered or permit exempt turbine or a turbine that is not subject to emission limits without modifying this permit. Potential emissions from the temporary replacement turbine must be less than or equal to the potential emissions from the original grandfathered or permit exempt turbine or for the turbine that is not subject to emission limits, as determined by applying appropriate emission factors.

2.1.1.3 Temporary replacement turbines 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.

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

2.1.1.5 All data collected pursuant to this AOS shall be kept on site for five (5) years and made available to the Division upon request.

2.1.1.6 For comparison with an annual or short term emissions limit, data collected pursuant to this AOS 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 shall be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

2.2 Internal Combustion Engine Replacement

The following Alternative Operating Scenario (AOS) for temporary 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 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.

For purposes of Regulation No. 3, Part B, Section IV.G.4.a., any engine replacement authorized under this AOS shall commence operation upon notation of same in the contemporaneous log as required below. Results of any testing required below shall be normalized for comparison to the applicable permitted emission limits.

2.2.1 Temporary 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 which requires the use of a temporary replacement engine. "Temporary" is defined as in the same service for 270 operating days or less in any 12 month period. The 270 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 270 day total. Note that the compliance demonstrations made as part of this AOS are in addition to any compliance demonstrations required by the permit.

2.2.1.1 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.

The permittee shall measure nitrogen oxide (NO_x) and carbon monoxide (CO) emissions in the exhaust from the temporary replacement engine using a portable flue gas analyzer within seven (7) calendar days of commencing operation of the temporary replacement engine. Calibration of the analyzer shall be conducted according to manufacturer=s instructions.

In the absence of evidence to the contrary, results of the portable flue gas analyzer test shall be evidence of enforceable compliance or noncompliance of the temporary replacement engine with the emission limitations of the original engine.

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable flue gas analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 calendar days of

commencing operation of the replacement engine. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the temporary replacement engine will be considered to be in compliance for purposes of this AOS from the time that the replacement engine commenced operation until the replacement engine is taken off line.

If portable flue gas analyzer results fail to indicate the compliance with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. In the absence of evidence to the contrary, the temporary replacement engine will be considered to be out of compliance from the time that the temporary replacement engine commenced operation until the engine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period.

2.2.1.2 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. Potential emissions from the temporary replacement engine must be less than or equal to the potential emissions 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.

2.2.1.3 Temporary replacement engines, whether of the same manufacturer, model, and horsepower, or of a different manufacturer, model, or horsepower, 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.

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

2.2.1.5 Results of all tests conducted pursuant to this AOS shall be kept on site for five (5) years and made available to the Division upon request.

2.2.1.6 For comparison with an annual or short term emissions limit, the results of any testing

required by this AOS 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 shall be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

2.3 Additional Sources

Current State Air Quality Regulations do not allow for advanced New Source Review in the absence of discrete and verifiable information concerning future installations. Therefore, any additional operational changes requiring new equipment at this facility not addressed by these Alternative Operating Scenarios will need to undergo appropriate Regulation No. 3 review procedures.

3. Prevention Of Significant Deterioration (PSD)

3.1 This facility is an existing major stationary source (potential to emit of any criteria pollutant > 250 tpy) for the purposes of Prevention of Significant Deterioration (PSD) requirements (Colorado Regulation 3, Part B, Section IV.D.3). Future modifications to this facility which are in excess of significance levels as defined in Colorado Regulation 3, Part A, Section I.B.58 or a modification which is major by itself will result in the application of the PSD review requirements.

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

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

4.1 This facility is subject to the provisions of the Accidental Release Prevention Program (section 112(r) of the Federal Clean Air Act).

4.2 The source shall certify to the Division in writing that the source is in compliance with all requirements of 112(r) and that the Risk Management Plan has been submitted to the appropriate authority and/or a designated central location. Such certification shall be signed by the Responsible Official.

5. Summary of Emission Units

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

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
E001	006	S001	Solar Centaur Model T-3550 2,732 HP Natural Gas Fired Turbine, Serial Number 1087C41	None
E002	004	S002	Cooper Superior Model 6G825 600 HP Natural Gas Fired Internal Combustion Engine, 4-Cycle, Rich Burn, Serial Number 273179	None
E003	002	S003	Propak System Model H-410 Natural Gas Fired Amine Heater, Rated at 9.0 MMBtu/hr, Serial Number 84214-C	None
E004	008	S004	Sivalls Triethylene Glycol Dehydration Unit, Model GCR-750-450-EL, 19 MMscf/day, with 0.75 MMBtu/hour burner, Serial Number 32.286	None
E005	010	S005	Amine Regeneration Unit, Model Unknown, Serial Number Unknown	None
E006	N/A	S006	Ethylene Glycol Dehydration Unit, Model Unknown, 18 MMscf/day, with 1.25 MMBtu/hour burner, Serial Number Unknown	Flare(flash tank only)
E007	009	S007	Facility Fugitive Volatile Organic Compound Emissions	None

SECTION II - Specific Permit Terms

1. P001 - Solar Centaur 2,732 HP Natural Gas Fired Turbine

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	1.1,1.2,1.3	150 ppmv*	89.4 tons/yr	0.646 lb/MMBtu	Recordkeeping, Calculation, Portable Monitoring(See Cond. 1.2), Stack Test(See Cond. 1.3)	Monthly, Quarterly, One Time
CO		N/A	31.5 tons/yr	0.228 lb/MMBtu		
PM	1.4	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
SO_2	1.5	150 ppmvd* or 0.8 wt% S in fuel	N/A	N/A	NSPS GG§60.334§60.335	Annual Certification
	1.6	0.8 lb/MMBtu	N/A	N/A	Fuel Restriction	Annual Certification
Fuel Use	1.7	N/A	361.0 MMscf/yr	N/A	Recordkeeping	Monthly
BTU Content	1.8	N/A			EPA Methods	Semi-Annually
Opacity	1.9	Less than or equal to 20%		N/A	Fuel Use Restriction	Annually

* At 15% O_2 and ISO conditions as measured by Test Method 20

1.1 Nitrogen Oxide and Carbon Monoxide emissions shall not exceed the limitations stated above (Colorado Construction Permit 95RB422). Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors in the following equation:

lb/month = (EF) H (Btu content, Btu/scf) H (Fuel Use, MMScf/month)

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

1.2 Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from this turbine shall be conducted quarterly using a portable flue gas analyzer. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of the turbine. For comparison with an annual emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the year 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 year (8760).

An exceedance of either the NO_x or CO emission limitation during the initial portable flue gas analyzer test shall require a subsequent portable analyzer test indicating compliance with both the NO_x and CO emission limitations within 14 calendar days of the initial test. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

If portable flue gas analyzer results indicate compliance with both the NO_x and CO emission limitations within the 14 day period, the source may certify that the turbine is in compliance with both the NO_x and CO emission limitations for the relevant time period.

If portable flue gas analyzer results fail to indicate the compliance of the turbine with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period. The source will be required to conduct EPA Reference Test Methods (identified as Reference Method 7E and Reference Method 10, or Reference Method 19 (40C.F.R. Part 60 Appendix A), hereinafter "EPA Reference Test Methods") or other test methods or procedures acceptable to the Division within 45 calendar days of the end of the 14 day period allowed for the portable flue gas analyzer testing. The Division shall be notified at least 30 calendar days prior to the EPA Reference Test date, so that it may choose whether to observe the testing.

If the EPA Reference Test results indicate compliance with both the NO_x and CO emission limitations, the source may certify that the turbine is in compliance with both the NO_x and CO emission limitations for the relevant time period.

If the EPA Reference Tests fail to demonstrate compliance with either the NO_x or CO emission limitations and in the absence of evidence to the contrary, the turbine will be considered to be out of compliance from the date of the initial portable flue gas analyzer test until the turbine is taken off line. Results of all testing that indicates noncompliance shall be submitted to the Division within 14 calendar days after receipt of the test results.

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

1.3 A compliance test shall be conducted near the end of the permit term to measure the emission rates of nitrogen oxides and carbon monoxide using EPA approved methods or other methods approved by the Division. Any stack tests conducted to show compliance with an annual emission limit shall have the results projected to the annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time. If there are no restrictions, the default multiplier shall be 8,760 hours per year.

The compliance testing shall be completed and copies of the results provided to the Division within 365 calendar days prior to the expiration of this Operating Permit. A copy of the test results shall be provided to the Division within 60 calendar days of the completion of the tests. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the

Division for review and approval at least thirty (30) days prior to testing. No test shall be conducted without prior approval from the Division.

1.4 Particulate emissions shall not exceed the limit, in pounds per million Btu, described by the equation $PE=0.5(FI)^{-0.26}$, where FI is the fuel input in million Btu per hour and PE is the emissions limit in pounds per million Btu (Colorado Regulation No. 1, Section III.A.1). In the absence of evidence to the contrary, compliance with the particulate limit shall be presumed whenever natural gas is used as fuel for this unit. The Annual Compliance Certification shall include a statement as to the continued use of natural gas.

1.5 This turbine is subject to NSPS Subpart GG - Standards of Performance for Stationary Gas Turbines. Emissions of sulfur dioxide shall be limited by complying with one of the conditions described in 1.5.1 and 1.5.2. In the absence of evidence to the contrary, compliance with one of these conditions shall be presumed whenever natural gas is used as fuel for this turbine. The Annual Compliance Certification shall include a statement as to the continued use of natural gas.

1.5.1 The turbine exhaust gas SO_2 concentrations shall not exceed 150 ppmvd as described in NSPS Subpart GG §60.333.

1.5.2 The sulfur content of the fuel gas combusted in the turbines shall not exceed 0.8% by weight as described in NSPS Subpart GG §60.333.

1.6 Emissions of sulfur dioxide from this turbine shall not exceed 0.8 pounds per million Btu of heat input (Colorado Regulation No. 1, Section VI.B.4). In the absence of evidence to the contrary, compliance with the sulfur dioxide limit shall be presumed whenever natural gas is used as fuel for these units. The Annual Compliance Certification shall include a statement as to the continued use of natural gas.

1.7 Fuel consumption shall not exceed the limitations stated above (Construction Permit 95RB422). Fuel use shall be measured and recorded within the first seven (7) days of each month. Fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

1.8 The Btu content of the natural gas used to fuel this turbine shall be verified semi-annually in accordance with ASTM Analysis Method D1826-77 or equivalent. The Btu content of the natural gas shall be based on the lowest gross heating value of the fuel. Calculations of monthly emissions required under Condition 1.1 shall be made using the Btu content derived from the most recent required analysis.

1.9 Opacity of emissions from this turbine shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for the turbine.

1.10 This turbine shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction.

2. P002 - Cooper Superior 480 HP Internal Combustion Engine

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
Emissions Calculation	2.1	N/A	N/A	NOx-15.0 g/hp-hr CO-8.6 g/hp-hr VOC-1.25 g/hp-hr	Calculation	Annually
Hours of Operation	2.2	N/A	N/A	N/A	Recordkeeping	Monthly
Opacity	2.3	Less than or equal to 20%		N/A	Fuel Use Restriction	Annually

2.1 The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this unit (AP-42, Table 3.2-2, 1/95).

2.2 Hours of operation shall be monitored monthly and recorded in a log to be made available to the Division upon request. Recorded data shall be multiplied by the Compliance Emission Factors and maximum site rated horsepower to calculate emissions for determination of annual fees and APEN reporting.

2.3 Opacity of emissions from this engine shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for the engine.

2.4 This engine shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction.

3. P003 - Propak System Amine Heater

Parameter	Permit Condition	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	3.1.	N/A	6.0 TPY	0.098 lb/MMBtu	Recordkeeping and Calculation	Monthly
PM	3.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Fuel Use	3.3	N/A	86.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	3.4	Less than or equal to 20%		N/A	Fuel Use Restriction	Annually

Btu Content	3.5	N/A	ASTM Analysis Method	Semi-Annually

3.1 Nitrogen Oxide emissions shall not exceed the limitation stated above (Colorado Construction Permit 84RB304). Monthly emissions of this pollutant shall be calculated using the fuel-based emission factor in the following equation:

lb/month = (EF) H (Btu content, Btu/scf) H (Fuel Use, MMscf/month)

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

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

3.3 Fuel consumption shall not exceed the limitations stated above (Colorado Construction Permit 84RB304). Fuel use shall be measured and recorded within the first seven (7) days of each month. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.4 Opacity of emissions from this heater shall not exceed 20% (Colorado Regulation No. 1, Section II.A.1). In the absence of credible evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for this heater.

3.5 The Btu content of the natural gas used to fuel these engines shall be verified semi-annually in accordance with ASTM Analysis Method D1826-77 or equivalent. The Btu content of the natural gas shall be based on the lowest gross heating value of the fuel. Calculations of monthly emissions required under Condition 3.1 shall be made using the Btu content derived from the most recent required analysis.

4. P004 - Sivalls Triethylene Glycol Dehydration Unit

Parameter	Permit Condition Number	Limitations		Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	4.1,4.3	N/A	200.0 tons/year	Based on Input to GLYCalc Model	Parametric, Performance Test(See Condition 4.3)	Monthly, One Time
Natural Gas Processed	4.2	N/A	6,935 MMscf/year	N/A	Flow Meter	Monthly

4.1 Volatile Organic Compound emissions for this unit shall not exceed the limitations stated above (Colorado Construction Permit 95RB617-1, as modified by revised APEN of 7/30/98). Emissions of Volatile Organic Compounds and Hazardous Air Pollutants will be calculated monthly using the Gas Research Institute's GLYCalc Version 3.0 Model or higher. Parametric monitoring of the natural gas throughput, triethylene glycol recirculation rate, inlet gas pressure and temperature and triethylene glycol consumption rate will be performed to verify input to this model. Recording interval for these parameters will be on a monthly basis, except for glycol consumption which will be required annually. Values shall be representative of how the unit operated during the period. An extended natural gas analysis of the processed wet gas will be conducted on a quarterly basis, utilizing ASTM standards or equivalent. Monthly calculation of emissions using GLYCalc Version 3.0 or higher will be conducted by the end of each subsequent month utilizing the gas data from the last analysis conducted and representative parameters. Monthly emissions of VOC will be used in a twelve month rolling total to verify compliance with the annual limitation.

4.2 The cubic feet of gas processed by the glycol dehydration unit shall not exceed the limitations listed above (Construction Permit 95RB617-1). The gas throughput to the dehydration unit shall be recorded monthly using a flow meter. A twelve month rolling total will be maintained to verify compliance with the annual limitation.

4.3 A performance test shall be conducted within six (6) months of permit issuance to verify compliance with the Volatile Organic Compound (VOC) emission rate. If the performance test indicates compliance with the emission limits then future compliance shall be demonstrated as required under conditions 4.1-4.2. Tests shall be conducted using a protocol approved by the Division. The protocol shall be submitted at least 30 days prior to any testing required under this condition. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test manual. All performance tests shall be witnessed by Division personnel at the Division's discretion.

5. P005 - Amine Regeneration Unit

Parameter	Permit Condition Number	Limitations		Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	5.1	N/A	64.0 tons/year	11.2 lbs/hr(Based on Stack Test)	Recordkeeping and Calculation	Monthly, One Time
Hours of Operation	5.2	N/A	N/A	N/A	Recordkeeping	Monthly
Natural Gas Processed	5.3	N/A	6,570 MMscf/year	N/A	Flow Meter	Monthly

5.1 Volatile Organic Compound emissions for this unit shall not exceed the limitations stated above (Colorado Construction Permit 95RB617-3, as modified by revised APEN of 7/30/98). The emission factor listed above has been approved by the Division and shall be used to calculate emissions from this unit.

5.2 Hours of operation shall be monitored monthly and recorded in a log to be made available to the Division upon request. Recorded data shall be used to determine compliance with the annual emission limit.

5.3 The cubic feet of gas processed by the amine regeneration unit shall not exceed the limitations listed above (Colorado Construction Permit 95RB617-3). The gas throughput to the regeneration unit shall be recorded monthly using a flow meter. A twelve month rolling total will be maintained to verify compliance with the annual limitation.

6. P006 - Ethylene Glycol Dehydration Unit

Parameter	Permit Condition Number	Limitations		Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	6.1	N/A	5.0 tons/year	Based on Input to GLYCalc Model	Parametric	Monthly
Natural Gas Processed	6.2	N/A	6,570 MMscf/year	N/A	Flow Meter	Monthly
Control Device Operation	6.3	A flame must be present at all times during which the dehydration unit is running		NA	Flame Indicator	At all Times

6.1 Volatile Organic Compound emissions for this unit shall not exceed the limitations stated above (Colorado Revised APEN 9/30/98). Emissions of Volatile Organic Compounds and Hazardous Air Pollutants will be calculated monthly using the Gas Research Institute's GLYCalc Version 3.0 Model or higher. Parametric monitoring of the natural gas throughput, ethylene glycol recirculation rate, inlet gas pressure and temperature and ethylene glycol consumption rate will be performed to verify input to this model. Recording interval for these parameters will be on a monthly basis, except for glycol consumption which will be required

annually. Values shall be representative of how the unit operated during the period. An extended natural gas analysis of the processed wet gas will be conducted on a quarterly basis, utilizing ASTM standards or equivalent. Monthly calculation of emissions using GLYCalc Version 3.0 or higher will be conducted by the end of each subsequent month utilizing the gas data from the last analysis conducted and representative parameters. Monthly emissions of VOC will be used in a twelve month rolling total to verify compliance with the annual limitation.

6.2 The cubic feet of gas processed by the glycol dehydration unit shall not exceed the limitations listed above (Colorado Revised APEN 9/30/98). The gas throughput to the dehydration unit shall be recorded monthly using a flow meter. A twelve month rolling total will be maintained to verify compliance with the annual limitation.

6.3 Emissions from the dehydration unit flash tank shall be routed to a flare. The dehydration unit shall not be in operation if a flame is not present in the flare. A device must be installed and maintained to indicate the presence of a flame (e.g. fire eye).

7. F007 - Facility Fugitive Emissions

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	7.1	N/A	25.5 tons/yr	By Component - EPA Protocol for Equipment Leak Estimates	Recordkeeping	Annual Certification
General Provisions	7.2	N/A	N/A	N/A	Subject to NSPS General Provisions (Amine Unit Only)	Subject to NSPS General Provisions
Leak Detection and Repair	7.3	N/A	N/A	N/A	Subject to NSPS KKK (Amine Unit Only)	Subject to NSPS KKK

7.1 VOC emissions from equipment leaks shall not exceed the limitation stated above (Colorado Construction Permit 95RB617-2). Emissions shall be calculated using the emission factors and equations listed below. A component count shall be maintained and adjusted annually to determine the existing hardware inventory. This shall be accomplished by conducting an actual component count before the permit is issued and then maintaining records of component additions and deletions.

Emission Factors for individual types of components in lbs/component-hr (Baseline Emission Factors from EPA, August 1995):

	Gas	Condensate
Valves	9.92E-03	5.51E-03
Relief Valves	1.94E-02	1.65E-02

Compressor Seals	1.94E-02	1.65E-02
Flanges	8.60E-04	2.43E-04
Open-ended Lines	4.41E-03	3.09E-03
Pump Seals	5.29E-03	2.86E-02
Connectors	4.41E-04	4.63E-04

Annual Emissions of VOC per Component:

(Component Count) H (8760 hrs/year) H (%VOC in Organic Portion of Gas Stream) H (Component Emission Factor)

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

The results of the most recent quarterly extended gas analysis required in Condition 4.1 of this section shall be used to determine the appropriate %VOC to use in the above equation.

7.2 Regulation No. 6, Part A, Subpart A, General Provisions applies as follows:

7.2.1 No article, machine, equipment or process shall be used to conceal an emissions which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gasses discharged to the atmosphere. (§60.12)

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

7.3 This source is subject to 40 CFR Part 60.630, Subpart KKK, New Source Performance Standards (as adopted by reference in Colorado Regulation 6): Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The following items apply:

7.3.1 Inspection and maintenance requirements as stated in federal NSPS 40 CFR §60.632, §60.633, and §60.634.

7.3.2 Record keeping requirements as stated in federal NSPS 40 CFR §60.635.

7.3.3 Reporting requirements as stated in federal NSPS 40 CFR §60.636. Reporting under this section is to be fulfilled concurrently with Appendix B compliance monitoring reporting and shall be submitted to the Division.

7.3.4 The source shall submit a report detailing the specific applicable and nonapplicable sections of NSPS KKK to the Division within 6 months of the permit issue date following the format provided in Appendix G.

SECTION III - Permit Shield

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

1. Specific Conditions

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

Emission Unit Description &Number	Applicable Requirement	Justification
Facility	40CFR60 Subparts K and Ka adopted by reference in Colorado Regulation No. 6, Part A	These subparts apply to vessels used for storage of petroleum liquids. The materials stored at the Foundation Creek Plant do not meet the definition of petroleum liquids.
Natural Gas Liquids Storage Vessels (4 @ 1,000 barrels each)	40CFR60 Subpart Kb adopted by reference in Colorado Regulation No. 6, Part A	This subpart regulates the storage of volatile organic liquids in vessels greater than 40 m^3 in size. These vessels at the Foundation Creek Plant are designed to operate at pressures greater than 15 psig with no emissions to the atmosphere. Subpart Kb does not apply to vessels that meet this description. In addition, installation of these vessels predates the promulgation of Subpart Kb.
P002, P004, P006	40CFR60 Subpart KKK adopted by reference in Colorado Regulation No. 6, Part A	These units were installed prior to the January 1984 effective date of this subpart and have not been modified since the effective date.
P005	40CFR60 Subpart LLL adopted by reference in Colorado Regulation No. 6, Part A	This subpart regulates units that separate H_2S and CO_2 from sour natural gas. Unit P005 processes sweet natural gas and, thus, does not meet this definition.

2. General Conditions

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

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

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

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

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

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

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

SECTION IV - General Permit Conditions

1. Administrative Changes

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

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

2. Certification Requirements

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

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

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

c. Compliance certifications shall contain:

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

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

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

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

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

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

3. Compliance Requirements

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

a. The permittee must comply with all conditions of the Operating Permit. Any permit noncompliance relating to federally-enforceable terms or conditions constitutes a violation of the federal act, as well as the state act and Regulation No. 3. Any permit noncompliance relating to state-only terms or conditions constitutes a violation of the state act and Regulation No. 3, shall be enforceable pursuant to state law, and shall not be enforceable by citizens under § 304 of the federal act. Any such violation of the federal act, the

state act or regulations implementing either statute is grounds for enforcement action, for permit termination, revocation and reissuance or modification or for denial of a permit renewal application.

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

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

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

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

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

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

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

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

4. Emergency Provisions

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

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

a. an emergency occurred and that the permittee can identify the cause(s) of the emergency;

b. the permitted facility was at the time being properly operated;

c. during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and

d. the permittee submitted oral notice of the emergency to the Air Pollution Control Division no later than noon of the next working day following the emergency, and followed by written notice within one month of the time when emissions limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

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

5. Emission Standards for Asbestos

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

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

6. Emissions Trading, Marketable Permits, Economic Incentives

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

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are specifically provided for in the permit.

7. Fee Payment

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

a. The permittee shall pay an annual emissions fee in accordance with Regulation No. 3, Part A, Section VI. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee of $50 per hour. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee of $100 for each APEN or revised APEN filed.

8. Fugitive Particulate Emissions

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

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

9. Inspection and Entry

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

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

a. enter upon the permittee's premises where an Operating Permit source is located, or emissions-related activity is conducted, or where records must be kept under the terms of the permit;

b. have access to, and copy, at reasonable times, any records that must be kept under the conditions of the permit;

c. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Operating Permit;

d. sample or monitor at reasonable times, for the purposes of assuring compliance with the Operating Permit or applicable requirements, any substances or parameters.

10. Minor Permit Modifications

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

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

11. New Source Review

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

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

12. No Property Rights Conveyed

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

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

13. Odor

Regulation No. 2, 5 CCR 1001-3

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

14. Off-Permit Changes to the Source

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

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

15. Opacity

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

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

16. Open Burning

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

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

17. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

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

18. Permit Expiration and Renewal

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

a. The permit term shall be five (5) years. The permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted.

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

19. Portable Sources

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

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

20. Prompt Deviation Reporting

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

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

21. Record Keeping and Reporting Requirements

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

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

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

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

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

   (iv) the analytical techniques or methods used;

   (v) the results of such analysis; and

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

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

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

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

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

22. Reopenings for Cause

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

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3, Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

b. The Division shall reopen a permit whenever additional applicable requirements become applicable to a major source with a remaining permit term of three or more years, unless the effective date of the requirements is later than the date on which the permit expires, or unless a general permit is obtained to address the new requirements; whenever additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program; whenever the Division determines the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or whenever the Division determines that the permit must be revised or revoked to assure compliance with an applicable requirement.

c. The Division shall provide 30 days' advance notice to the permittee of its intent to reopen the permit, except that a shorter notice may be provided in the case of an emergency.

d. The permit shield shall extend to those parts of the permit that have been changed pursuant to the reopening and reissuance procedure.

23. Section 502(b)(10) Changes

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

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

24. Severability Clause

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

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

25. Significant Permit Modifications

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

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

26. Special Provisions Concerning the Acid Rain Program

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

a. Where an applicable requirement of the federal act is more stringent than an applicable requirement of regulations promulgated under Title IV of the federal act, 40 Code of Federal Regulations (CFR) Part 72, both provisions shall be incorporated into the permit and shall be federally enforceable.

b. Emissions exceeding any allowances that the source lawfully holds under Title IV of the federal act or the regulations promulgated thereunder, 40 CFR Part 72, are expressly prohibited.

27. Transfer or Assignment of Ownership

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

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

28. Volatile Organic Compounds

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

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

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

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

29. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

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

OPERATING PERMIT APPENDICES

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

*DISCLAIMER:

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

APPENDIX A - Inspection Information

1. Directions to Plant:

The facility is located approximately 35 miles south of the town of Rangely on S.H. 139 in Rio Blanco County

2. Safety Equipment Required:

The applicant did not provide a list of required safety equipment for this facility. Based on information supplied in other applications, the following equipment is recommended:
Eye Protection
Hard Hat
Safety Shoes
Hearing Protection
Flame Resistant Clothing

3. Facility Plot Plan:

The plot plan submitted on December 30, 1994 with the source's Title V Operating Permit Application was designated as confidential information and thus is not included in this Appendix.

4. List of Insignificant Activities:

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

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

Lube Oil Storage Tanks (294 and 714 gallons)
Propane Storage Vessels (1,008 gallon)
Glycol Storage Tanks (294 gallon)
Triethylene Glycol Heater
Amine Waste Storage Tank (295 gallon)
Amine Storage Tank (84 gallon)
Methanol Storage Tank (nominally 500 gallon)
Condensate Storage Tank (12,600 gallon)
Liquid Waste Storage Tank (2,520 gallon)
Ethylene Glycol Storage Tank (nominally 500 gallon)
Natural Gas Liquids Storage Vessels (30,000 gallon)

APPENDIX B
Reporting Requirements and Definitions

with codes ver 9/1/00

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

(A) makes any false material statement, representation, or certification in, or omits material information from, or knowingly alters, conceals, or fails to file or maintain any notice, application, record, report, plan, or other document required pursuant to the Act to be either filed or maintained (whether with respect to the requirements imposed by the Administrator or by a State);

(B) fails to notify or report as required under the Act; or

(C) falsifies, tampers with, renders inaccurate, or fails to install any monitoring device or method required to be maintained or followed under the Act shall, upon conviction, be punished by a fine pursuant to title 18 of the United States Code, or by imprisonment for not more than 2 years, or both. If a conviction of any person under this paragraph is for a violation committed after a first conviction of such person under this paragraph, the maximum punishment shall be doubled with respect to both the fine and imprisonment.

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

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

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

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

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

Report #2: Permit Deviation Report (must be reported "promptly")

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

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

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

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

(1) A situation where emissions exceed an emission limitation or standard contained in the permit;

(2) A situation where process or control device parameter values demonstrate that an emission limitation or standard contained in the permit has not been met;

(3) A situation in which observations or data collected demonstrates noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit; or,

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

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

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

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

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

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

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

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

[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 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.

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

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

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

Startup, Shutdown, and Malfunctions

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

Emergencies and Upsets

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

DEFINITIONS

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

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

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

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

APPENDIX B: Monitoring and Permit Deviation Report - Part I

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

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. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: Canyon Gas Resources, Inc. – Foundation Creek
OPERATING PERMIT NO: 95OPRB017
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
P001	Solar Centaur Model T-3550 2,732 HP Natural Gas Fired Turbine, Serial Number 1087C41					
P002	Cooper Superior Model 6G825 600 HP Natural Gas Fired Internal Combustion Engine, 4-Cycle, Rich Burn, Serial Number 273179					
P003	Propak System Model H-410 Natural Gas Fired Amine Heater, Rated at 9.0 MMBtu/hr, Serial Number 84214-C					
P004	Sivalls Triethylene Glycol Dehydration Unit, Model GCR-750-450-EL, 19 MMscf/day, with 0.75 MMBtu/hour burner, Serial Number 32.286					
P005	Amine Regeneration Unit, Model Unknown, Serial Number Unknown					
P006	Ethylene Glycol Dehydration Unit, Model Unknown, 18 MMscf/day, with 1.25 MMBtu/hour burner, Serial Number Unknown					
F007	Facility Fugitive Volatile Organic Compound 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
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = CAM:	A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.
9 = Other:	When the deviation is not covered by any of the above categories

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Canyon Gas Resources, Inc. – Foundation Creek
OPERATING PERMIT NO: 95OPRB017
REPORTING PERIOD:

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

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

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Upsets/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
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 _____ Shutdown _____ Malfunction
Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

START- 1730 4/10/96
END- 1800 4/10/96

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Upsets/Emergencies Reported (if applicable)

4/10/96 to S. Busch, APCD

Deviation Code _____ Division Code QA: _____

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Canyon Gas Resources, Inc. – Foundation Creek

FACILITY IDENTIFICATION NUMBER: 1030020

PERMIT NUMBER: 95OPRB017

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

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

STATEMENT OF COMPLETENESS

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

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

_____

Printed or Typed Name | Title

_____

Signature of Responsible Official | Date Signed

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

APPENDIX C
Required Format for Annual Compliance Certification Report

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

FACILITY NAME: Canyon Gas Resources, Inc. – Foundation Creek
OPERATING PERMIT NO: 95OPRB017
REPORTING PERIOD:

I. Facility Status

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

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

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
P001	Solar Centaur Model T-3550 2,732 HP Natural Gas Fired Turbine, Serial Number 1087C41								
P002	Cooper Superior Model 6G825 600 HP Natural Gas Fired Internal Combustion Engine, 4-Cycle, Rich Burn, Serial Number 273179								
P003	Propak System Model H-410 Natural Gas Fired Amine Heater, Rated at 9.0 MMBtu/hr, Serial Number 84214-C								
P004	Sivalls Triethylene								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	YES	NO	Continuous	Intermittent	YES	NO
	Glycol Dehydration Unit, Model GCR-750-450-EL, 19 MMscf/day, with 0.75 MMBtu/hour burner, Serial Number 32.286								
P005	Amine Regeneration Unit, Model Unknown, Serial Number Unknown								
P006	Ethylene Glycol Dehydration Unit, Model Unknown, 18 MMscf/day, with 1.25 MMBtu/hour burner, Serial Number Unknown								
F007	Facility Fugitive Volatile Organic Compound Emissions								
General Conditions									
Insignificant Activities [5]									

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

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

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

March 2000

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

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

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

II. Status for Accidental Release Prevention Program:

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

B. If subject: The facility _____ is _____ is not in compliance with all the requirements of section 112(r).

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by the required date.

III.. Certification

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

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

_____

Printed or Typed Name Title

_____

Signature Date Signed

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

APPENDIX D
Notification Addresses

1. **Air Pollution Control Division**

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

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

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

Permit Modifications, Off Permit Changes:

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

APPENDIX E
Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EPA -	Environmental Protection Agency
FR -	Federal Register
G -	Grams
Gal -	Gallon
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code

SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F
Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
June 6, 2001	Cover pages	Revised company name and address, contact person, responsible officiak, phone numbers
	Appendix B and C	Revised to reflect current version
August 15, 2001	Cover pages	Revised company name and address, contact person, responsible officiak, phone numbers
September 5, 2001	Cover pages	Revised nature of business and SIC
	Appendix B and C	Revised source name
October 31, 2001	Cover pages	Revised Monitoring Report and Compliance Certification due dates.
	Section I, Item 2	Revised Alternative Operating Scenario language to reflect the current version
	Section I, Item 4	Revised Accidental Release language
	Section II, Conditions 1.9, 2.3 and 3.4 and Tables 1, 2 and 3	Revised opacity language to reflect current version

APPENDIX G
NSPS KKK Example Report Format

DISCLAIMER: This is only an example report and does not cover all possible KKK requirements.

NSPS SUBPART KKK
STANDARDS OF PERFORMANCE FOR EQUIPMENT
LEAKS OF VOC FROM ONSHORE NATURAL GAS
PROCESSING PLANTS

Acme Gas Processing
FID: 9991234
Permit #: 93OPXX999
September 1, 1996

Determination of reporting requirements for 93OPXX999 under Subpart KKK Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. **Note that any non-applicability determinations under the provisions of 60.630 must be accompanied by a detailed explanation including copies of any relevant test results or any other supporting documentation.**

Determination of NSPS KKK requirements:

60.630

(a)(1) Applies to Acme plant since it is an onshore natural gas processing plant.

(2) Applies to Acme plant since compressors are in VOC service and wet gas service.

(3) Applies to Acme Plant since the group of equipment, excluding compressors, is in wet gas service.

(b) Applies to Acme since the plant was placed into operation after January 20, 1984.

(e) Applies to the compressor station and glycol dehydration units since they are located at the plant.

60.632

(a) Subject to the provisions of this subpart and shall comply as soon as practical, but no later than 180 days after initial startup.

60.482-1 Subject to parts (a) and (b) requiring that compliance be demonstrated within 180 days of equipment initial startup. This compliance shall be determined by a

	review of records and reports, performance test results, and inspection methods and procedures of 60.485. Part (d) applies but ACME has no equipment in vacuum service.
60.482-2	Exempt under 60.633 (d).
60.482-3	Exempt under 60.633(f).
60.482-4	Applies but superseded by 60.633 (b).
60.482-5	Exempt under 60.633(c).
60.482-6	Does Not Apply. ACME does not have any open-ended lines.
60.582-7	Applies to this facility. Valves shall be monitored monthly by methods in 485(b)-(e). An instrument reading of 10,000 ppm or greater indicates a leak. Any valve for which a leak hasn't been detected for 2 successive months will be monitored the first month of every quarter until a leak is detected. After detection of a leak, the valve shall be monitored monthly until a leak is not detected for 2 successive months. When a leak is detected, it shall be repaired as soon as practical but no later than 15 calendar days after detection. A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.
60.482-8	Does Not Apply. ACME has no equipment in heavy liquid service or pressure relief devices in light liquid service.
60.482-9	Applies to this facility. Delays of equipment repair allowed as specified under this subpart.
60.482-10	Does Not Apply. ACME has no closed vent systems or control devices.

60.483 Alternative Standards

Acme has elected not to use the provisions of 60.483-1 which allows alternative standards for valves by complying with an allowable percentage of leaking valves of equal to or less than 2.0 percent.

Acme has elected not to use the provisions of 60.483-2 which allows alternative standards for valves by skipping period(s) of leak detection and repair.

60.633 Exceptions

(b)(1) Each pressure relief device shall be monitored quarterly and within 5 days after each pressure relief to detect leaks as per 60.485(b).

(2) An instrument reading of 10,000 ppm or greater is a leak.

(3)(I) When a leak is detected, it shall be repaired as soon as practical, but no later than 15 calendar days after detection.

(ii) A first attempt at repair shall be made no later than 5 calendar days after each leak is detected.

(4) Does Not Apply. Facility is staffed full-time.

(c) Applies to this facility. As previously stated, ACME is exempt from the requirements of 60.482-5.

(d) Applies, ACME has a design capacity to process 5 million standard cubic feet per day of field gas (less than the 10 MMSCF/day limit). As such, ACME is exempt from the routine monitoring requirements of 60.482-2(a)(1) and 60.482-7(a), and paragraph (b)(1) of this section.
(e) Does Not Apply. Facility not in the Alaskan North Slope.
(f) Applies to this facility. All compressors are in wet gas service and are therefore exempt from the requirements of 60.482-3.
(g) Does Not Apply. ACME has no flaring equipment.
(h) Does Not Apply. ACME has no equipment in heavy liquid service.

60.634 Alternative Means of Emission Limitation

Acme has not elected to use the provisions of 60.634 which allows an alternative means of emission limitation if approved by the Administrator and published in the Federal Register.

60.635 Record keeping requirements

(a) Applies to this facility. Subject to the requirements of 60.486.

60.486 Record keeping requirements

60.482-7 -	When each leak is detected as specified this provisions, the requirements of 60.486(b) and 60.486(c) apply.
60.482-1 to 60.482-10 -	All equipment subject to these provisions are subject to the provisions of 60.486(e).
60.482-7(g), (h)-	All valves subject to these provisions are subject to the requirements of 60.486(f).
60.486(j)-	Information and data used to demonstrate that a piece of equipment is not in VOC service shall be recorded in a log that is kept in a readily accessible location.

60.635(b)(1) When a leak has been detected a weatherproof marker shall be placed on the pressure relief device.
(b)(2) When each leak is detected, the following information shall be kept for at least 2 years in the operational log
(I) the identification number of the instrument used to identify the leak the operator identification number and the identification number of the equipment responsible for the leak.
(ii) the date the leak was detected and the dates of repair
(iii) the repair methods used to repair the leak
(iv) if the leak was above 10,000 ppm
(v) if the repair was delayed and how many days
(vi) signature of the owner or operator identifying and repairing the leak
(vii) was the leak repaired in less than 15 days after the discovery of the leak and if it was not the reason for the delay.
(viii) the dates of process unit shutdown that occurred to repair the leak

(ix) the date of successful repair of the leak
(x) the list of equipment identification numbers for no detectable emissions

60.636 Reporting requirements

(a) Applies to this facility. Subject to the reporting requirements of 60.487.
(b) Operator shall include the following information on a semi annual report:
(1)-(4) Number of pressure relief devices subject to the requirements of 60.636(b)
(e)(1) Number of pressure relief devices for which leaks were detected
(c)(2) Number of pressure relief devices for which leaks were not repaired

60.487 Reporting requirements

(a) Each owner or operator subject to the provisions of Subpart VV shall submit semiannual reports beginning 6 months after the initial startup date.
(b) The initial report to the administrator shall include the process unit identification and the number of equipment subject to 60.482-7, 60.482-2, 60.482-3.
(c) All semiannual reports shall include the following information:
(1) Process unit identification
(2) For each month:
(I) Number of valves for which leaks were detected under 60.482-7.
(ii) Number of valves for which leaks were not repaired as required under 60.482-7.
(iii - vi) Exempt under various provisions above
(vii) The facts that explain each delay and repair and, where appropriate, why a process unit shutdown was technically infeasible.
(3) Dates of process unit shutdowns within the semiannual reporting period.
(4) Any new items not included in the initial list of subject equipment.
(d) If electing to comply with alternative monitoring, the administrator shall be notified of the standard selected 90 days prior to implementation.
(e) All performance tests shall be reported. The administrator shall be notified of any initial performance tests 30 days prior to testing.

CONCLUSION OF FINDINGS

In general, ACME is subject to the general monitoring for valves in gas/vapor service and pressure relief devices. Valves will be monitored monthly for leaks (readings above 10,000 ppm) except that 2 successive months without leaks shall allow the monitoring to be quarterly. Pressure relief devices will be monitored quarterly for leaks (readings above 10,000 ppm) and within 5 days after each pressure release. All leaking equipment will be marked with a weatherproof tag. All leaks will be repaired no later than 15 days after detection. A first attempt at repair shall be made no later than 5 calendar days after leak detection. Any changes in equipment which triggers additional requirements will be reported no later than the semi-annual report. Records shall be maintained on site with the information as described under 60.635 and 60.486, above. Reports shall contain the information described under 60.636 and 60.487, above.

Therefore the following forms shall be submitted on a semi annual basis beginning September 1, 1997 for compliance under NSPS KKK. The form shall also report an estimated volume of VOC emissions which were associated with the leak, or failure of any pressure relief device reported on the log books, or in the reporting form as attached. Acme does keep records of the testing and replacement of all pressure relief valves and a copy of these records is attached for review.