TECHNICAL REVIEW DOCUMENT FOR OPERATING PERMIT 960PAD160

Phillips Pipeline Company Adams County Facility ID 0010015

Prepared on March 10, 1998 Revised May 7, 1998, June 24, 1998, & August 31, 1998 Vince Brindley, Review Engineer

I. <u>Purpose</u>

This document will establish the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Colorado Title V Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA, during Public Comment, and for other interested parties. Information in this report is primarily from the application received on February 16, 1995 and additional information received on May 9, 1995, January 20, 1998 and June 19, 1998. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

On April 16, 1998 the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction permits. These procedures are being directly implemented in all operating permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the construction permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling 12 month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting hours of operation.

Any revisions made to the underlying construction permits associated with this facility made in conjunction with the processing of this operating permit application have been reviewed in accordance with the requirements of Regulation No. 3, Part B, Construction Permits, and have been found to meet all applicable substantive and procedural requirements. This operating permit incorporates and shall be considered to be a combined construction/operating permit for any such revision, and the permittee shall be allowed to operate under the revised conditions upon issuance of this operating permit without applying for a revision to this permit or for an additional or revised Construction Permit.

II. Source Description

This facility is a bulk gasoline terminal (petroleum marketing terminal), classified under the Standard Industrial Classification of 5171, which receives product by pipeline and stores refined petroleum products for distribution via tanker trucks. The facility is located on thirty-nine and one half acres in Commerce City, Adams County, Colorado. There are no affected states within 50 miles of the facility. A Federal Class I designated area, Rocky Mountain National Park, is within 100 kilometers of the plant. The area in which the plant operates is designated as non-attainment for carbon monoxide, particulate matter less than 10 microns, and ozone.

The Denver metropolitan area was previously designated by U.S. EPA as a non-attainment area for ozone. Under recently adopted revisions to the Federal Rules, the Denver metro area is no longer designated non-attainment. However, all SIP- approved requirements continue to apply in order to prevent "backsliding" under the provisions of Section 183(e) of the federal Clean Air Act.

The source is considered to be a major source (Potential To Emit (PTE) > 100 Tons Per Year (TPY)) for purposes of the non-attainment area New Source Review (NSR) program. However, this source is considered "grandfathered" from NSR and as such a review was not triggered. Any major modification would subsequently trigger NSR review. Facility wide emissions are as follows:

Pollutant	Potential To Emit	1997 Actual Emissions
	(TPY)	(TPY)
NOx	28.5	14.8
CO	37.0	36.4
SO_2	neg	neg
VOC	141.83	139.19
PM	1.5	neg
PM_{10}	1.5	neg

This source is considered a "Synthetic Minor" for Hazardous Air Pollutants (HAPs), as designated in Construction Permit number 11AD935. This facility shall not emit greater than nine (9) tons per year of any single HAP or 24 tons per year of combined HAPs. Total facility-wide emission of HAPs is estimated to be 22.33 tons per year at the requested storage and loading throughput. Estimated 1997 emissions of HAPs was 6.84 tons of a single HAP (MTBE) and 19.13 tons of all HAP combined.

Potential emissions are based upon existing Colorado Construction Permit limitations. Actual emissions are based upon the last Air Pollution Emission Notices (APENs) received by the Division. Emissions of SO₂ are negligible from the equipment at this facility. This source will file a revised APEN with the Division if annual emissions change by five (5) tons, whichever is less, compared to the latest APEN on file with the Division. Under the guidelines of EPA's Whitepaper for streamlining the operating permit process, actual emissions for the last data year were not required during the application process.

Therefore, the Division assumes that emissions from this facility have remained the same or decreased since the last APEN submittal based upon the compliance certification in the operating permit application.

On June 19, 1998, Phillips submitted revisions to their Operating Permit Application. They wished to redesignate one storage tank from distillate only to gasoline and distillate. They also requested to include emissions from two portable flares, currently permitted under Colorado Construction Permits 13AD072-1P and 13AD072-2P, that are used at the facility. Revised storage tank estimates using the newer TANKS 3 program will replace the older estimates from TANKS 2 (which did not allow for adjustment of the atmospheric pressure to account for altitude). Phillips also recalculated its facility wide emissions and requested that the new limits of 150.8 tons per year (tpy) of Volatile Organic Compounds; 29.4 tpy of Nitrogen Oxides; and 41.3 tpy of Carbon Monoxide be incorporated into the Operating Permit. The Hazardous Air Pollutant emissions will still be limited to 9 tpy of any single HAP and 24 tpy of combined HAPs. These changes have been incorporated in this Technical Review Document and in the draft Operating Permit. These changes will be considered a minor modification of the Construction Permit and will be incorporated into the Final Approval.

On July 24, 1998, Phillips submitted comments the draft permit as part of the source prereview prior to the public comment. In these comments Phillips asked to add an additional arm to the existing loading rack which would be considered a modification under the NSPS. As such, the requirements of Subpart XX and Subpart A (General Provisions) have been incorporated directly into the operating permit.

Facility-wide annual limitations for emissions and throughput will be on a rolling twelvemonth total. Each month, a new twelve-month total shall be calculated based upon the previous twelve month's data. Any exceedance of annual limitations will result in the source being considered out of compliance with the terms and conditions of their Operating Permit. The source will provide compliance monitoring reports semi-annually and compliance certification reports annually.

III. <u>Emission Sources</u>

A. General Discussion for Gasoline Bulk Terminals

1. Applicable Requirements- All air pollution emission sources are subject to the 20% visible opacity limitation of Regulation 3, Part A.II. as well as the general permit conditions of Section IV of this source's Title V Operating Permit. The following terms and conditions of this facilities construction permit have been incorporated into the Operating Permit as applicable requirements: yearly emissions of Carbon Monoxide (CO), Oxides of Nitrogen (NOx), and Volatile Organic Compounds (VOC); annual gasoline and distillate throughputs; Regulation 7 requirements; and opacity. The NSPS General Provisions and Subpart XX were added as applicable requirements by Phillips during processing of the application

due to an expected modification to the loading rack.

2. Emission Factors- Emissions from gasoline terminals are produced during filling and withdrawal of product from storage tanks, standing losses from storage tanks, loading of tank trucks (primarily from displacement of the saturated vapors in the truck collected during vapor balance unloading at the delivery point), and from fugitive losses from the various flanges, pumps, fittings, etc associated with the process piping. The major pollutants of concern are VOCs and Hazardous Air Pollutants (HAPs). NOx, CO and Particulate Matter (TSP and PM10) are also emitted as by-products of the vapor combustor unit (flare) utilized to control the VOC emissions and from a boiler at this facility.

In general, emission factors from the EPA publication "Compilation of Air Pollutant Emission Factors", also known as AP-42, are generally accepted as representative of the sources at these facilities. The emissions estimate program Tanks 3.0 is also accepted for estimating emissions from storage tanks containing volatile organic compounds. Phillips has chosen to use the emission factors as given in AP-42 and the results calculated by Tanks 3.0 to estimate emissions from their facility. Emission factors are listed in the permit as the source's monitoring plan relies upon them, however, individual emissions factors are not practical for storage tanks. Emissions factors for the other sources are given where practical, ie, loading rack, boiler, flare, fugitives. These emission factors will be listed individually for each source later in this document.

3. Monitoring and Compliance- The source will maintain and demonstrate compliance with the terms of their Operating permit by the following:

For the Loading Rack: Throughput of all petroleum products, gasoline products (all grades) and distillates (Kerosene Turbine Fuel (KTF)/Diesel), shall be tracked on a monthly and annual basis. The monthly throughput requirement was not included in the Construction Permit, it was added to the Operating Permit to make compliance with the rolling twelve-month emissions limits enforceable as a practical matter. Vapors displaced from tank trucks while loading will be collected and routed to a Vapor Combustor Unit (VCU) for destruction as per Reg. 7 and NSPS XX. VOC emissions from gasoline product loading shall be calculated on a monthly and annual basis using the controlled emission factor. Emissions from distillate loading shall be calculated on an uncontrolled basis using AP-42 and the physical properties specific to the type of product being loaded. HAP emissions shall be determined monthly by using vapor weight speciation data and the calculated VOC emissions. Emissions of Carbon Monoxide (CO) and Oxides of Nitrogen (NOx) shall be based on total product rack throughput (gasoline and KTF/Diesel) and the emission factors. Source shall also perform any additional monitoring and recordkeeping as required by the General Provisions and Subpart XX.

For the Storage Tanks: Monthly records of petroleum product type (gasoline,

KTF/diesel, and gasoline additives) and throughputs for each tank shall be maintained. The monthly throughput requirement was not included in the Construction Permit, it was added to the Operating Permit to make compliance with the rolling twelve month total emissions limits enforceable as a practical matter. VOC emissions shall be calculated for each individual tank using TANKS 3.0 or higher or other equivalent tank emission calculating method. All gasoline storage tanks (except T501 which has an internal floating roof) are vented to the VCU and the calculated emissions from these tanks may be reduced by the destruction efficiency of the VCU. HAP emissions shall be calculated from the vapor weight speciations and the calculated VOC emissions.

For Fugitive VOC Emissions from Equipment Leaks: Source shall calculate fugitive emissions associated with equipment leaks from process equipment (flanges, valves, fittings, etc.) using 8760 hours per year and generally acceptable published emission factors. Emissions shall be calculated on an annual basis. HAP emissions shall be calculated from the liquid or vapor weight speciations and the calculated VOC emissions. The source shall conduct an initial count of components within 90 days of the issuance of the Operating Permit. Records shall be kept of all additions or deletions of components and a running tally maintained; a "hard count" shall be conducted every five (5) years.

Miscellaneous VOC Emissions: Source shall calculate emissions from cleaning of storage tanks using emission factors from AP-42 and other EPA published documents. E missions from tank cleanings shall not exceed a maximum of 3.94 tpy. Monthly and annual emissions from loading of propane shall be determined based on the number of loading events. Emissions from the Propane/NGL portable flares shall be calculated monthly. Soil vapor extraction (SVE) outlet concentration shall be tested quarterly and test data shall be used to calculated monthly and annual emissions. HAP emissions shall be calculated from the vapor weight speciations and the calculated VOC emissions.

- **4. Compliance Status-** This facility originally certified that it was in compliance with all applicable requirements. A concurrent request for modification of the facility-wide Construction permit was received with the Operating permit application. Emission limitations were subsequently modified and the facility received "synthetic minor" status with respect to HAPs. The source is considered to be in compliance with all applicable requirements at this time.
- **B.** Discussion of Individual Emission Unit Permit Conditions-The following emission units are specifically regulated under the terms and conditions of the operating permit proposed for this site:
- 1. Emission Units: E001
 - a. Loading Rack, Gasoline Storage tanks, Vapor Combustor Unit

Unit ID	Description	Capacity (Gal)	Point
FLRACK- 2	Loading Rack & VCU		019
T051	Gasoline AST, Fixed Roof	172,032	001
T054	Gasoline AST, Fixed Roof	172,032	012
T101	Gasoline AST, Fixed Roof	384,300	010
T102	Gasoline AST, Fixed Roof	384,300	018
T105	Gasoline AST, Fixed Roof	384,300	011
T106	Gasoline AST, Fixed Roof	384,342	002
T107	Gasoline AST, Fixed Roof	384,300	017
T201	Gasoline AST, Fixed Roof	801,486	013
T202	Gasoline AST, Fixed Roof	801,486	014
T203	Gasoline AST, Fixed Roof	801,486	015
T204	Gasoline AST, Fixed Roof	801,486	016
T501	Gasoline AST, Internal Floating Roof	1,951,446	009

All of the above points are vented to the VCU except for tank T501 which has an internal floating roof. Gasoline storage throughput is "bubbled": there are no tank specific limitations. Tanks designated for gasoline storage may also be used to store distillate products.

b. Applicable Requirements- The construction permit defined the applicable requirements for the above points including opacity, emission limitations, and those sections of Reg. 7 that apply to this facility. Limits on product throughput, VOC, NOx, CO and HAPs were established in the construction permit. Only tank T501 is subject to NSPS Subpart K due to construction after June 11, 1973 and prior to May 19, 1978. All other tanks and the loading rack pre-date NSPS requirements. However, since Phillips requested to modify the loading rack, the provisions of NSPS Subparts A and XX have been added to the permit.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 11AD935 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

The short term emissions and throughput limits associated with these points have

been removed per the guidance in paragraph two (2) of this document. Specifically the monthly facility-wide storage and rack throughput, VOC, NOx, and CO limits have been removed.

c. Emission Factors- The following emission factors or calculations shall be used in determining emissions from the above points (note: source requested to use 30 mg/l for the VOC calculations):

Pollutant Emission Factor

VOC - 30 mg/liter of gasoline loaded

- Distillate loading emissions will be calculated using the

loading loss equation from AP-42 (ver 1/95)

- Tanks 3.0 or higher for storage tanks, 95% control

allowed for tanks vented to VCU

HAPs - Speciated using vapor weight data and calculated

 VOC

NOx - 4 mg/l of **all** products loaded (industry standard EmF)

CO - 10 mg/l of **all** products loaded

d. Monitoring and Compliance- The source will monitor and meet the compliance schedule for these points as outlined. See the monitoring and compliance discussion above.

2. Emission Unit: E002

a. Distillate Storage Tanks

Unit ID	Description	Annual Throughput (Gal)	Point
T002	Additive AST, Fixed Roof	1,079,400	020
T003	Additive AST, Fixed Roof	1,079,400	021
T052	KTF/Diesel AST, Fixed Roof	262,794,000	006
T053	KTF/Diesel AST, Fixed Roof	157,668,000	800
T103	KTF/Diesel AST, Fixed Roof	262,794,000	007
T104	KTF/Diesel AST, Fixed Roof	262,794,000	005

Unit ID	Description	Annual Throughput (Gal)	Point
T301	KTF/Diesel AST, Fixed Roof	262,794,000	004
T601	KTF/Diesel AST, Fixed Roof	400,000,000	003

b. Applicable Requirements- The construction permits defined the applicable requirements for the tanks listed above including emission limitations and those sections of Regulation 7 that apply. Limits on product throughput, VOC, and HAPs were established in the construction permit. The distillate storage tanks are not "bubbled," tank specific limits were requested and are listed in the table above.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 11AD935 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

The short term emissions and throughput limits associated with these points have been removed per the guidance in paragraph two (2) of this document. Specifically the monthly storage throughput and VOC limits have been removed.

c. Emission Factors-The following emission factors or calculations shall be used in determining emissions from the above points:

PollutantEmission FactorVOC- Tanks 3.0 or higher

HAPs - Speciated using vapor weight data and calculated

VOC

d. Monitoring and Compliance- The source will monitor and meet the compliance schedule for these points as outlined above. See the monitoring and compliance discussion above in Section III.A.3.

- 3. Emission Unit: E003
 - a. Miscellaneous VOC Sources

Unit ID	Description	Point
SVES	Soil Vapor Extraction System	022
TNKCLN	Tank Cleaning Fugitives	027
DISC	Propane Truck Loading	028
FLRP	Maintenance Flares	

b. Applicable Requirements - There are no applicable requirements specific to these miscellaneous VOC sources, except the record keeping and reporting of calculated emissions to comply with the facility wide VOC and HAP emission limits.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 11AD935 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

The short term emission limits associated with these points have been removed per the guidance in paragraph two (2) of this document. Specifically the monthly facility-wide VOC limits have been removed.

c. Emission Factors - The following emission factors or calculations shall be used in determining emissions from the above points:

<u>Pollutant</u>	Emission Factor
VOC	- SVE emissions shall be calculated from quarterly
	testing
	- Tank cleaning estimation equation from AP-42 and EPA
	document EPA-453/R-94-002b (as stated in application)
	- Flare emissions shall be based on a mass balance
	using a 95% destruction efficiency
	- Propane losses shall be based on 0.92 lb/loading event
HAPs	- Speciated using vapor or liquid weight data and
	calculated VOC

d. Monitoring and Compliance - Testing of the Soil Vapor Extraction system shall be performed quarterly. EPA Method 18 or equivalent, as approved by the Division, shall be used to determine the concentration of volatile petroleum hydrocarbons in the outlet stream. Source shall record the actual operating hours of the SVE and the flow rate of the system. Results of the SVE monitoring shall be kept at the facility and made available to the Division upon request. SVE testing shall revert back to weekly for a period not less than 6 weeks in the event that

additional petroleum products are spilled at the facility. The source will monitor and meet the compliance schedule for the other points as outlined above. See the monitoring and compliance discussion above in Section III.A.3.

4. Emission Unit: E004

a. Fugitive Emissions from Equipment Leaks

Unit ID	Description	Point
FLRACK-1	Equipment Fugitive Leaks	026

b. Applicable Requirements- The construction permits defined the applicable requirements for the fugitive emissions listed above including emission limitations and those sections of Regulation 7 that apply. Limits on VOCs and HAPs were established in the construction permit.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 11AD935 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

The short term emission limits associated with these points have been removed per the guidance in paragraph two (2) of this document. Specifically the monthly facility-wide VOC limits have been removed.

c. Emission Factors- The following emission factors shall be used in determining emissions from fugitive sources:

Description	VOC Emission Factor lb/comphr
Pump Seals - Light Liquid	0.00117
Pump Seals - Heavy Liquid	0.019
Valve - Light Liquid	9.48E-05
Valve - Heavy Liquid	0.0005
Valve - Vapor	2.87E-05
Connector - Light Liquid	1.72E-05
Connector - Heavy Liquid	7E-05

Description	VOC Emission Factor lb/comphr
Connector - Vapor	9.04E-05
Open End Line	0.000287
Relief Valves	2.87E-05
Drains	0.07

- **d. Monitoring and Compliance** The unit will monitor and meet the compliance schedule for these points as outlined above. See the monitoring and compliance discussion above in Section III.A.3.
- 5. Emission Unit: E005

a. Boiler -

Unit ID	Description	Point
BOILER	25 MMBTU/HR Boiler	029

b. Applicable Requirements- This boiler is considered "grandfathered" from Construction Permit requirements since it was in operation prior to February 1972. Colorado Reg. 1, III.A.1.b establishes a particulate emission limit of 0.217 lbs/mmBTU. Boiler is not subject to NSPS Subpart Dc because of its construction date.

There were no short term emission limits removed from the is point. The particulate standard is specifically required by Colorado Regulation 1 and will remain as per the guidance in paragraph two (2) of this document.

c. Emission Factors - The following emission factors shall be used in determining emissions from the above points:

 Pollutant
 Emission Factor

 NOx
 - 140 lb/10⁶ ft³ (AP-42, ver 10/96)

 CO
 - 35 lb/10⁶ ft³ (AP-42, ver 10/96)

d. Monitoring and Compliance- Annual fuel consumption shall be maintained. NOx and CO emissions shall be calculated annually from the fuel consumptions and the emission factors.

IV. <u>Insignificant Activities</u>

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:

- 1. In-house analytical lab for quality control
- 2. Landscaping and site housekeeping equipment
- 3. Chemical storage of chemicals in closed container where total storage capacity does not exceed 5000 gallons
- 4. Fugitive dust from dirt roads
- 5. Additive tanks (except T002 and T003)
- 6. Oil/Water separator
- 7. Filter change-out
- 8. Meter proving
- 9. Sump

V. <u>Alternative Operating Scenarios</u>

There are no alternative operating scenarios for this facility.

VI. Permit Shield

The following items were identified by the applicant as specifically non-applicable to their facility:

Colorado Regulation No. 6, Part B, Subpart K, Ka, Kb, Standards of Performance for Storage Vessels for Petroleum Liquids...

All of the tanks at this facility, with the exception of tank T501, were constructed prior to the applicability dates for all of these regulations and they have not been reconstructed or modified since their initial construction. Tank T501 is exempt from Subparts Ka and Kb since it was constructed prior to May 18, 1978. T501 has not been reconstructed or modified since initial construction.

Colorado Regulation No. 6, Part B, Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.

The boiler at this source is exempt from this regulation as it has not been constructed, reconstructed, or modified after the June 9, 1984 applicability date.

National Emission Standards for Hazardous Air Pollutants, 40 CFR, Part 63, Subpart R, Stage I Gasoline Distribution.

This source has obtained a Colorado state issued Construction Permit with

Federally enforceable limits on HAP emissions prior to the December 15, 1997 compliance deadline. As such it is now considered an Area source for HAPs and is not subject to these standards.

There were numerous other regulations that were listed by the applicant as specifically non-applicable to their facility. These have not been included here because they could not reasonably apply to this facility at this time.

VII. <u>Accidental Release - 112(r)</u>

This facility has indicated in the application that they are not subject to the provisions of section 112(r).

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provision must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Section 68.215(e) of the Federal Clean Air Act requires the Division to address four issues in regards to operating permit sources subject to 112(r):

1. Verify source submitted and register an RMP by deadline

EPA is in the process of setting up a Website specifically for 112(r) plans. All 112(r) sources will electronically submit their plans to this "designated central location". The Division will require sources certify in their annual compliance certification that they are/are not subject to 112(r) and they have/have not submitted a Risk Management Plan (RMP) to the designated central location by June 20, 1999. In addition, the Division will check the 112(r) website to verify that a RMP was actually submitted to the website by the deadline. Failure to submit a RMP by the June deadline by sources subject to 112(r) will be considered a permit deviation for reporting purposes under Title V.

2. Verify that source owner/operator has submitted a source certification or in its absence has submitted a compliance schedule.

As mentioned above, the Division will require that sources certify in their annual compliance certification that they are/are not subject to 112(r) and they have/have not submitted a Risk Management Plan (RMP) to the designated central location by June 20,1999. If they are subject to 112(r) but did not submit an RMP on time, a compliance schedule under the provisions of Title V must be submitted to the Division by the source. Failure to submit a RMP or a compliance schedule by the June deadline by sources subject to 112(r) will be considered a permit deviation for reporting purposes under Title V.

3. For some or all sources use one or more mechanisms such as completeness check, source audits, record review, or facility inspections to ensure permitted sources are in compliance with the requirements of this part

The Division may choose to perform any or all of the activities listed under this subsection. Although there is no specific number of such actions required in the 112(r) rule, a June 3, 1997 draft 112(r) implementation guidance from EPA states that "Congress considered a requirement that 1.4 percent of the RMPs be audited annually, but dropped that provision."

The Division will, at a minimum, perform a "completeness check" on an unspecified number of Title V 112(r) sources. The website that EPA is in the process of developing to accept 112(r) RMP's will include software that will electronically conduct a completeness check on the RMP's. For the purposes of this operating permit, such check shall serve as the completeness check required under 68.215(e)(3). As noted in the Preamble to the final 112(r) rule (June 20, 1996 Federal Register, page 31691), "EPA agrees that the review for quality or adequacy of the RMP is best accomplished by the implementing agency..." In Colorado, the implementing agency is the U.S. EPA. If the EPA website software indicates that a source did not submit a complete plan, it will be considered a permit deviation for reporting purposes under Title V and the Division may initiate an enforcement action for failure to meet the Title V permit condition (see below). Per the Preamble (page 31691), the Division may perform the completeness checks in a timeframe consistent with the source's Title V certifications.

4. Initiate enforcement action as necessary

This refers to enforcement under Title V, not under Part 68 (112(r)). If a source fails to file a RMP or a compliance schedule by the June deadline or the EPA software indicates that the RMP is not complete, it will be considered a permit deviation for reporting purposes under Title V and the Division may initiate an enforcement action.