Colorado Department
of Public Health
and Environment

OPERATING PERMIT

North American Resources Company - Ft. Lupton Plant

Issued October 1, 1999

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME: Ft. Lupton Plant

OPERATING PERMIT NUMBER

99OPWE207

FACILITY ID: 1230319

ISSUE DATE: October 1, 1999
EXPIRATION DATE: October 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:
North American Resources Company
16157 Weld County Road 22
Ft. Lupton, CO 80621

PLANT SITE LOCATION:
16157 Weld County Road 22
Ft. Lupton, CO 80621
Weld County

INFORMATION RELIED UPON
Operating Permit Application Received: February 24, 1999
And Additional Information Received:

Nature of Business: Natural Gas Plant
Primary SIC: 1311

RESPONSIBLE OFFICIAL
Name: Jim Benner
Title: President

Phone: (406) 723-5454

FACILITY CONTACT PERSON
Name: Jeff Reale
Title: Senior Operations Superintendant

Phone: (303) 659-7740

SUBMITTAL DEADLINES
Semi-Annual Monitoring Period: October 1 - March 31, April 1 - September 30
Semi-Annual Monitoring Report: May 1, 2000 & November 1, 2000 and subsequent years
Annual Compliance Period: Begins October 1 to September 30
Annual Compliance Certification: November 1, 2000 and subsequent years

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SECTION I - General Activities and Summary

1. **Permitted Activities**

1.1. This facility consists of a natural gas processing plant defined under Standard Industrial Classification 1311. Raw natural gas is received in the Ft. Lupton plant and goes through one of two cryogenic processing trains. An engine compresses the inlet gas, an amine unit fired by a heater removes CO2 and H2S. The remaining residue compression is completed by six additional engines. Two fractionation trains separate out ethane, propane, butane and natural gasoline. Heat to the fractionation plant is provided by a natural gas fired hot oil heater. Refrigeration compression is provided by three engines. In addition the plant has a flare, fugitive VOC emissions from miscellaneous equipment at the plant, and an incinerator used for the combustion of oily solid waste.

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

There are no affected states within 50 miles of the plant. The following Federal Class I designated area is within 100 kilometers of the plant; Rocky Mountain National Park.

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 Permits: 93WE157-(1-4, 7, 8), 95WE683, 97WE0722, 97WE0723, 97WE0724, 97WE0725, 97WE0726, 97WE0727, 97WE0728 and 97WE0729.

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

2.1.1. No separate operating scenarios have been specified.

3. Prevention of Significant Deterioration

3.1. This facility is not a major stationary source (no criteria pollutant emissions with a Potential to Emit of greater than 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 may result in an exceedance of the major source threshold. Once that threshold is exceeded, future modifications at this facility resulting in a significant net emissions increase as listed 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 Risk Management Plan required by the Act shall be submitted to the appropriate authority and/or a designated central location by June 20, 1999.

4.3. 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
S001	001	P001	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion, Site Rated at 514 HP, SN: 83891.	Uncontrolled
S002	002	P002	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83892.	Uncontrolled
S003	003	P003	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion, Site Rated at 514 HP, SN: 83889.	Uncontrolled
S004	004	P004	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83890.	Uncontrolled
S007	007	P007	Fugitive VOC Emissions	Uncontrolled
S008	008	P008	Flare Industries 16" Model 250 Flare	Uncontrolled
S009	009	P009	Amine Treating Unit, Rated at 2,500 bbl/d of Natural Gas Liquids.	Uncontrolled
S010	010	P010	Elastec Smart Ash Model 100 Incinerator, SA18894, Design Rated at 48 lbs/hr and 0.4 MMBtu/hr.	Uncontrolled
S012	012	P012	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion, Site Rated at 550 HP, SN: 84286.	Uncontrolled
S013	013	P013	Born Natural Gas Fired Amine Unit Heater, Design Rated at 10.7 MMBtu/hr, Model and SN: 2885-0.	Uncontrolled

S014	014	P014	Born, Inc Natural Gas Fired Hot Oil Heater, Design Rated at 32 MMBtu/hr, SN: 1963.	Uncontrolled
S015	015	P015	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84308.	Uncontrolled
S016	016	P016	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84288.	Uncontrolled
S017	017	P017	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84287.	Uncontrolled
S018	018	P018	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1237.	Uncontrolled
S019	019	P019	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1240.	Uncontrolled

SECTION II - Specific Permit Terms

1. S001-S004 - Four Ajax 2-Cycle Lean Burn ICEs (514 HP each)

Parameter	Permit Condition Number	Limitations **for each engine** Short Term	Long Term	Compliance Emission Factor	Monitoring Method	Interval
NOx	1.1.	NA	11.6 tons/yr	0.514 lb/MMBtu	Recordkeeping, Calculations and Portable Monitoring	Monthly, Quarterly
CO		NA	11.6 tons/yr	0.30 lb/MMBtu		
VOC		NA	5.8 tons/yr	0.15 lb/MMBtu		
Fuel Use	1.2.	NA	42.57 MMscf/yr	NA	Fuel Allocation (see Appendix H)	Monthly
Hours of Operation	1.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	1.4.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times
Btu Content	1.5.	NA	NA	NA	ASTM Analysis Method	Semi-Annually

1.1. Emissions of Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compounds **from each engine** shall not exceed the limitations stated above (Colorado Construction Permits 93WE157-(1-4)). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (EF) in the following equation:

Lbs/month = [EF x monthly fuel use (MMscf/month) x heat content of gas (Btu/scf)]

A twelve-month rolling total 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.

Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer as specified in Condition 11.1.

1.2. Fuel consumption **for each engine** shall not exceed the limitations above (Colorado Construction Permits 93WE157-(1-4)). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

1.3. Hours of operation **for each engine** shall be recorded on a monthly basis for use in fuel allocation calculations.

1.4. Opacity of emissions **from each engine** shall not exceed 20 % (Colorado Construction Permits 93WE157-(1-4)). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these engines.

1.5. The Btu content of the natural gas used to fuel these engines shall be determined semi-annually using ASTM Analysis Method D1945 or equivalent. Calculation of monthly emissions outlined under Condition 1.1 shall be based on the most recent BTU analysis. The BTU Content shall be based on the lowest gross heating value of the fuel.

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

2. **S007 - Fugitive VOC Emissions**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
VOC	2.1.	NA	19 tons/yr	By Component Type - EPA Protocol for Equipment Leak Estimates	Recordkeeping	As Noted
Gas Analysis	2.2.	NA	NA	NA	EPA Reference Methods	Quarterly (To Annually)
General Provisions	2.3.	NA	NA	NA	Subject to NSPS General Provisions	
Leak Detection and Repair	2.4.	NA	NA	NA	Subject to NSPS KKK	

2.1. Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit 93WE157-7 as modified under the provisions of Section I Condition 1.3.) Emissions shall be calculated using the emission factors and equations listed below.

Emission Factors for individual types of components in lb/components-hrs (Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017):

	Leakers		Non-Leakers	
Equipment	Gas Service	Light Liq. Service	Gas Service	Light Liq. Service
Connectors	5.70E-02	5.70E-02	2.20E-05	2.10E-05
Flanges	1.80E-01	1.60E-01	1.30E-05	5.30E-06
Open-ended Line	1.20E-01	9.70E-02	3.30E-05	3.10E-05
*Other	2.00E-01	1.80E-01	2.60E-04	2.40E-04
Pump	1.60E-01	2.20E-01	7.70E-04	1.10E-03
Valve	2.20E-01	1.90E-01	5.50E-05	4.20E-05

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

Emissions of VOC per Component:

Components Leaking x EF for Leakers (lbs/component-hr) x 8760 hrs/yr x VOC content of gas

Components Non-leaking x EF for Non-Leakers (lbs/component-hr) x 8760 hrs/yr x VOC content of gas

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

2.1.1. An initial physical hard-count of facility components will be conducted within 180 days of permit issuance to verify existing hardware inventory..

2.1.2. A component count shall be conducted every five (5) years to verify existing components and inventory.

2.1.3. A running total shall be kept of all additions and subtractions to the component count.

2.2. Samples of inlet gas shall be collected and analyzed once per quarter. Frequency of gas analyses shall move to semi-annually after the first year, then to annually after the second year if VOC concentrations remain consistent. Frequency will revert back to quarterly if this is not the case. The most recent gas analysis shall be used in calculating emissions in Condition 2.1.

2.3. 40 CFR 60, Subpart A, General Provisions (as adopted by reference in Colorado Regulation No.6 Subpart A) applies as follows:

2.3.1. 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)

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

2.4. This source is subject to 40 CFR Part 60.630, Subpart KKK, New Source Performance Standards (as adopted by reference in Colorado Regulation No. 6): Standards of Performance for

Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The following items apply:

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

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

2.4.3. 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.

2.4.4. The source shall follow the VOC Testing Program following the Protocol set forth in Appendix G.

3. **S008 - Flare Industries 16" Flare**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	3.1.	NA	2.68 tons/yr	100 lb/MMscf	Recordkeeping and Calculation	Monthly
CO		NA	2.25 tons/yr	84 lb/MMscf		
Fuel Use	3.2.	NA	51 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	3.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	3.4.	Less Than or Equal to 20%		NA	Visual Observations	Weekly

3.1. Emissions of Nitrogen Oxides and Carbon Monoxide shall not exceed the limitations stated above (Colorado Construction Permits 93WE157-8 as modified under the provisions of Section I Condition 1.3.). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factor (EF) and the monthly fuel use. A twelve-month rolling total 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. Fuel consumption shall not exceed the limitations above (Colorado Construction Permits 93WE157-8 as modified under the provisions of Section I Condition 1.3.). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

3.3. Hours of operation shall be recorded on a monthly basis for use in fuel allocation calculations.

3.4. Opacity of emissions shall not exceed 20 % (Colorado Construction Permits 93WE157-8). Compliance with the opacity requirements shall be monitored by conducting visual observation of emissions weekly, during normal operation. If any visible emissions are observed, the source shall investigate equipment performance and make any adjustments necessary. If, after maintenance has been performed, visible emissions persist for longer than one hour, an EPA Reference Method 9 opacity observation shall be performed to determine compliance with the opacity standard. The EPA Reference Method 9 opacity observations shall be performed by an observer with current and valid Method 9 certification.

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

4. **S009 - Amine Treating Unit (2,500 bbl/d)**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
H2S	4.1.	NA	NA	Material Balance	Recordkeeping and Calculation	Annual
Opacity	4.2.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times

4.1. Emissions shall be calculated annually for APEN reporting purposes (Regulation No. 3, Part A, Section II)

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

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

5. **S010 - Elastec Smart Ash (48 lbs/hr)**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	5.1.	NA	1.58 tons/yr	15.0 lbs/ton waste	Recordkeeping and Calculation	Monthly
PM10		NA	0.6 tons/yr	5.7 lbs/ton waste		
SO2		NA	0.26 tons/yr	2.5 lbs/ton waste		
NO2		NA	0.21 tons/yr	2.0 lbs/ton waste		
CO		NA	2.10 tons/yr	20.0 lbs/ton waste		
VOC		NA	1.58 tons/yr	15.0 lbs/ton waste		
Charge Limit	5.2.	NA	210 tons/yr	NA	Recordkeeping	Monthly
Flash Point of Waste	5.3.	Greater than or Equal to 100 °F		NA	Waste Restriction	Per Charge
Particulates	5.4.	0.10 gr/dscf corrected at 12% CO2		NA	Demonstrated Compliance with Conditions 5.2, 5.3 and 5.6	As Noted in Conditions 5.2, 5.3 and 5.6
Waste Burning Restrictions	5.5.	No Burning of Radioactive or Hazardous Waste		NA	Self Certification	Annually
Opacity	5.6.	Less Than or Equal to 20%		NA	EPA Reference Method 9	Annually
Personnel Requirements	5.7.	Trained Personnel Operating Incinerator		NA	Recordkeeping	Per Charge

5.1. Emissions of air pollutants shall not exceed the limitations above (Colorado Construction Permit 95WE683 as modified under the provisions of Section I Condition 1.3). Emissions from this unit shall be calculated monthly and a twelve month rolling total to comply with the annual limits using the equations below:
tons/month = [EF (lbs/ton waste) x waste burned (tons/month) x 1/2000 (ton/lbs)]

5.2. The charge weight of the incinerator shall not exceed the limitations above (Colorado Construction Permit 95WE683 as modified under the provisions of Section I Condition 1.3). Summarized monthly records of daily burning rates and hours of operation shall be maintained. The monthly charging rate shall be used in a twelve month rolling total to compare with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

5.3. The flash point of materials being burned shall be higher than or equal to 100 degrees F (Colorado Construction Permit 95WE683). Compliance with this requirement shall be demonstrated by monitoring and recording the materials being burned in each charge. Absorbent materials that contain volatile liquids, such as gasoline or paint thinner shall not be burned in this unit.

In addition, liquid fuel shall not be used as start-up fuel (Colorado Construction Permit 95WE683). An ample layer of dry paper or cardboard material supplies a fast, easy initial fuel source for start-up.

5.4. Particulate emissions shall not exceed 0.1 grains per dry standard cubic feet, corrected to 12% CO_2 (Colorado Construction Permit 95WE683). Demonstrated compliance with Conditions 5.2., 5.3., and 5.6. shall be adequate to ensure compliance with this particulate emission limit.

5.5. No radioactive or hazardous waste may be burned in the incinerator without obtaining the appropriate permits (Colorado Construction Permit 95WE683). Compliance with this requirement will be demonstrated by certifying annually that no radioactive or hazardous waste was burned.

5.6. Opacity of emission shall not exceed 20% (Colorado Construction Permit 95WE683). Compliance with this requirement shall be monitored by conducting visual emission observations, in accordance with EPA Reference Method 9, annually. Results of Method 9 readings and a copy of the certified Method 9 reader's certification shall also be kept on site and made available to the Division upon request.

5.7. The incinerator must be operated by trained personnel (Colorado Construction Permit 95WE683). Compliance with this requirement will be monitored by maintaining records of personnel trained to operate the incinerator. The name of the personnel operating the incinerator will be recorded for each charge of waste fed to the incinerator.

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

6. **S012 - Ajax 2-Cycle Lean Burn (550 HP)**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	6.1.	NA	16.8 tons/yr	0.543 lb/MMBtu	Recordkeeping, Calculations and Portable Monitoring	Monthly, Quarterly
CO		NA	20.1 tons/yr	0.3 lb/MMBtu		
VOC		NA	6.7 tons/yr	0.15 lb/MMBtu		
Fuel Use	6.2.	NA	47.24 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	6.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	6.4.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times
Btu Content	6.5.	NA	NA	NA	ASTM Analysis Method	Semi-Annually

6.1. Emissions of Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compounds shall not exceed the limitations stated above (Colorado Construction Permit 97WE0722). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (EF) in the following equation:

Lbs/month = [EF x monthly fuel use (MMscf/month) x heat content of gas (Btu/scf)]

A twelve-month rolling total 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.

Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer as specified in Condition 11.1.

6.2. Fuel consumption shall not exceed the limitations above (Colorado Construction Permit 97WE0722). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

6.3. Hours of operation shall be recorded on a monthly basis for use in fuel allocation calculations.

6.4. Opacity of emissions shall not exceed 20 % (Colorado Construction Permit 97WE0722). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these engines.

6.5. The Btu content of the natural gas used to fuel this engine shall be determined semi-annually using ASTM Analysis Method D1945 or equivalent. Calculation of monthly emissions outlined under Condition 6.1 shall be based on the most recent BTU analysis. The BTU Content shall be based on the lowest gross heating value of the fuel.

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

7. **S013 - Born Amine Unit Heater (10.7 MMBtu/hr)**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	7.1.	NA	6.8 tons/yr	100 lb/MMscf	Recordkeeping and Calculations	Monthly
CO		NA	5.7 tons/yr	84 lb/MMscf		
Fuel Use	7.2.	NA	128 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	7.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	7.4.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times

7.1. Emissions of Nitrogen Oxides and Carbon Monoxide shall not exceed the limitations stated above (Colorado Construction Permits 97WE0723 as modified under the provisions of Section I Condition 1.3). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (EF) and the monthly fuel use. A twelve-month rolling total 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.

7.2. Fuel consumption shall not exceed the limitations above (Colorado Construction Permit 97WE0723). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

7.3. Hours of operation shall be recorded on a monthly basis for use in fuel allocation calculations.

7.4. Opacity of emissions shall not exceed 20 % (Colorado Construction Permit 97WE0723). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for this unit.

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

8. **S014 - Born Natural Gas Fired Hot Oil Heater (32 MMBtu/hr)**

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
NOx	8.1.	NA	14.2 tons/yr	100 lb/MMscf	Recordkeeping and Calculations	Monthly
CO		NA	11.9 tons/yr	84 lb/MMscf		
Fuel Use	8.2.	NA	270 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	8.3.	NA	NA	NA	Recordkeeping	Monthly
NSPS Dc	8.4.	NA	NA	NA	Fuel Restriction	At All Times
Opacity	8.5.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times

8.1. Emissions of Nitrogen Oxides and Carbon Monoxide shall not exceed the limitations stated above (Colorado Construction Permit 97WE0724 as modified under the provisions of Section I Condition 1.3). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factor (EF) and the monthly fuel use. A twelve-month rolling total 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.

8.2. Fuel consumption shall not exceed the limitations above (Colorado Construction Permit 97WE0724 as modified under the provisions of Section I Condition 1.3). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

8.3. Hours of operation shall be recorded on a monthly basis for use in fuel allocation calculations.

8.4. This unit is subject to 40 CFR 60 Standards of Performance for New Stationary Sources, Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units as adopted by reference in Colorado Regulation No. 6, Part A, Subpart Dc. The source must certify annually that only natural gas was used as fuel for this unit.

8.5. Opacity of emissions shall not exceed 20 % (Colorado Construction Permit 97WE0724). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for this unit.

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

9. **S015-S017 - Three Ajax 2-Cycle Lean Burn ICEs (550 HP each)**

Parameter	Permit Condition Number	Limitations **for each engine** Short Term	Long Term	Compliance Emission Factor	Monitoring Method	Interval
NOx	9.1.	NA	10.6 tons/yr	0.543 lb/MMBtu	Recordkeeping, Calculation and Portable Monitoring	Monthly, Quarterly
CO		NA	10.6 tons/yr	0.30 lb/MMBtu		
VOC		NA	5.3 tons/yr	0.15 lb/MMBtu		
Fuel Use	9.2.	NA	38.3 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	9.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	9.4.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times
Btu Content	9.5.	NA	NA	NA	ASTM Analysis Method	Semi-Annually

9.1. Emissions of Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compounds **from each**

engine shall not exceed the limitations stated above (Colorado Construction Permits 97WE0725, 97WE0726 and 97WE0727). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (EF) in the following equation:

Lbs/month = [EF x monthly fuel use (MMscf/month) x heat content of gas (Btu/scf)]

A twelve-month rolling total 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.

Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer as specified in Condition 11.1.

9.2. Fuel consumption **for each engine** shall not exceed the limitations above (Colorado Construction Permits 97WE0725, 97WE0726 and 97WE0727). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

9.3. Hours of operation **for each engine** shall be recorded on a monthly basis for use in fuel allocation calculations.

9.4. Opacity of emissions **from each engine** shall not exceed 20 % (Colorado Construction Permits 97WE0725, 97WE0726 and 97WE0727). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these engines.

9.5. The Btu content of the natural gas used to fuel these engines shall be determined semi-annually using ASTM Analysis Method D1945 or equivalent. Calculation of monthly emissions outlined under Condition 9.1 shall be based on the most recent BTU analysis. The BTU Content shall be based on the lowest gross heating value of the fuel.

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

10. **S018-S019 - Two Caterpillar 4-Cycle Lean Burn ICEs (980 HP each)**

Parameter	Permit Condition Number	Limitations **for each engine** Short Term	Long Term	Compliance Emission Factor	Monitoring Method	Interval
NOx	10.1.	NA	18.9 tons/yr	0.585 lb/MMBtu	Recordkeeping, Calculation and Portable Monitoring	Monthly, Quarterly
CO		NA	18.9 tons/yr	0.492 lb/MMBtu		
VOC		NA	9.5 tons/yr	0.18 lb/MMBtu		
Fuel Use	10.2.	NA	63.4 MMscf/yr	NA	Fuel Allocation (See Appendix H)	Monthly
Hours of Operation	10.3.	NA	NA	NA	Recordkeeping	Monthly
Opacity	10.4.	Less Than or Equal to 20%		NA	Fuel Restriction	At All Times
Btu Content	10.5.	NA	NA	NA	ASTM Analysis Method	Semi-Annually

10.1. Emissions of Nitrogen Oxides, Carbon Monoxide and Volatile Organic Compounds **from each engine** shall not exceed the limitations stated above (Colorado Construction Permits 97WE0728 and 97WE0729). Emissions shall be calculated by the end of the subsequent month using the listed compliance emission factors (EF) in the following equation:

Lbs/month = [EF x monthly fuel use (MMscf/month) x heat content of gas (Btu/scf)]

A twelve-month rolling total 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.

Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer as specified in Condition 11.1.

10.2. Fuel consumption **for each engine** shall not exceed the limitations above (Colorado Construction

Permits 97WE0728 and 97WE0729). Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix H of this permit. The fuel use shall be measured no more than twelve (12) hours 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.

10.3. Hours of operation **for each engine** shall be recorded on a monthly basis for use in fuel allocation calculations.

10.4. Opacity of emissions **from each engine** shall not exceed 20 % (Colorado Construction Permits 97WE0728 and 97WE0729). In the absence of evidence to the contrary, compliance with the 20% opacity limit shall be presumed whenever natural gas is used as fuel for these engines.

10.5. The Btu content of the natural gas used to fuel these engines shall be determined semi-annually using ASTM Analysis Method D1945 or equivalent. Calculation of monthly emissions outlined under Condition 10.1 shall be based on the most recent BTU analysis. The BTU Content shall be based on the lowest gross heating value of the fuel.

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

11. Portable Monitoring

11.1. Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine 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 each engine. For comparison with an annual or short term emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

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 engine 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 engine 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 engine 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 engine will be considered to be out of compliance from the date of the initial portable flue gas analyzer test until the engine 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.

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 Non-Applicable Requirements**

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

Emission Unit Description & Number	Applicable Requirement	Justification
Unit S009	Regulation No. 3, Part B, Section III.A	Unit S009 is exempt from construction permitting requirements per exemption letter (95WE409.XP). Criteria emissions are below deminimis, however H2S emissions are above non-criteria reportable thresholds.
Entire Facility	Regulation No. 3, Part B, Section IV.D.3 (PSD)	Based on the information provided, this facility is not a major stationary source (no criteria pollutant emissions potential to emit > 250 tons per year) with respect to Prevention of Significant Deterioration (PSD) requirements as of the issue date of this permit.
Unit S014	Regulation No. 6, Part A, Subpart Dc (40 CFR 60 Subpart Dc §§60.42c; 60.43c, 60.44c; 60.45c; 60.46c; 60.47c; 60.48c(b), (c), (d), (e) and (f))	These sections are based on the use of either coal or fuel oil. This source utilizes only natural gas.

2. **General Conditions**

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

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

enforcement in cases of emergency;

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

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

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

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

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

3. **Streamlined Conditions**

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

No specific conditions were streamlined for this permit.

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 and is presented to assist the source, permitting authority, inspectors, and citizens.

APPENDIX A - Inspection Information

1. **Directions to Plant:**
From Ft. Lupton, follow US 85 north approximately 4 miles to Weld County Road 22. Turn right, cross the railroad tracks and continue east along WCR approximately 3 miles. Ft. Lupton plant is on the left (north) side of the road.

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

3. **Facility Plot Plan:**
Figure 1 (following page) shows the plot plan as submitted on February 24, 1999 with the source's Title V Operating Permit Application.

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

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

Stabilization heater, 1.02 MMBtu/hr
Heater for Process Train 1, 1.09 MMBtu/hr
Heater for Process Train 2, 3.17 MMBtu/hr
Five crude oil or wastewater tanks, 8400 gallons each
One brine tank, 8400 gallons
One Methylethanolamine (MDEA) tank, 8400 gallons
One deionized water tank, 4200 gallons
Two pressurized butane tanks, 24,600 gallons each
Six pressurized raw mix tanks, 30,000 gallons each
Six pressurized propane tanks, 30,000 gallons each
One pressurized natural gasoline tank, 30,000 gallons
Three pressurized butane tanks, 42,000 gallons each
Three pressurized natural gasoline tanks, 42,000 gallons each
One pressurized natural gasoline tank, 71,000 gallons

APPENDIX B

Reporting Requirements and Definitions

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

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

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

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

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

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

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

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

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

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

In addition to the monitoring requirements set forth in the permits as discussed above, each and every requirement of the

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

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

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

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

(1) A situation where emissions exceed an emission limitation or standard;

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

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

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. Note that as of the issue date of this permit that Colorado has not yet adopted the CAM rule.

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

1 = Standard:	When the requirement is an emission limit or standard
2 = Process:	When the requirement is a production/process limit
3 = Monitor:	When the requirement is monitoring
4 = Test:	When the requirement is testing
5 = Maintenance:	When required maintenance is not performed
6 = Record:	When the requirement is recordkeeping
7 = Report:	When the requirement is reporting
8 = Other:	When the deviation is not covered by any of the above categories

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

Submission of compliance certifications with terms and conditions in the permit, including emission limitations,

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

- The identification of each term or condition of the permit that is the basis of the certification;
- The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each permit term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated above. The certification shall identify each deviation and take it into account in the compliance certification;
- Such other facts as the Division may require to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. Note that as of the issue date of this permit that Colorado has not yet adopted the CAM rule.

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

APPENDIX B

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

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

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

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

DEFINITIONS

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

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

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

APPENDIX B

Required Format for Monitoring and Permit Deviation Report - Part I

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

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation.

FACILITY NAME: North American Resources Company - Ft. Lupton Plant
OPERATING PERMIT NO:99OPWE207
REPORTING PERIOD:_____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code[2]		Upset/Emergency Condition Reported During Period?	
		YES	NO			YES	NO
S001	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83891.						
S002	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83892.						
S003	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83889.						

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code[2]		Upset/Emergency Condition Reported During Period?	
		YES	NO			YES	NO
S004	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83890.						
S007	Fugitive VOC Emissions						
S008	Flare Industries 16" Model 250 Flare						
S009	Amine Treating Unit, Rated at 2,500 bbl/d of Natural Gas Liquids.						
S010	Elastec Smart Ash Model 100 Incinerator, SA18894, Design Rated at 48 lbs/hr and 0.4 MMBtu/hr.						
S012	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84286.						
S013	Born Natural Gas Fired Amine Unit Heater, Design Rated at 10.7 MMBtu/hr, Model and SN: 2885-0.						
S014	Born, Inc Natural Gas Fired Hot Oil Heater, Design Rated at 32 MMBtu/hr, SN: 1963.						
S015	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84308.						
S016	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84288.						

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code[2]		Upset/Emergency Condition Reported During Period?	
		YES	NO			YES	NO
S017	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84287.						
S018	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1237.						
S019	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1240.						
General Conditions							
Insignificant Activities							

[1] See previous discussion regarding what is considered to be a deviation. Determination of whether or not a deviation has occurred shall be based on a reasonable inquiry using readily available information.

[2] Use the following entries, as appropriate:

1 = Standard:: When the requirement is an emission limit or standard
2 = Process: When the requirement is a production/process limit
3 = Monitor: When the requirement is monitoring
4 = Test: When the requirement is testing
5 = Maintenance: When required maintenance is not performed
6 = Record: When the requirement is recordkeeping
7 = Report: When the requirement is reporting.
8 = Other: When the deviation is not covered by any of the above categories

Required Format for Deviation Report - Part II

FACILITY NAME: North American Resources Company - Ft. Lupton Plant
OPERATING PERMIT NO: 99OPWE207
REPORTING PERIOD: _____

Type of deviation (see footnote 2 above):

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

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

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Upsets/Emergencies Reported (if applicable)

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

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

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

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

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

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

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

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

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

Required Format for Deviation Report Certification - Part III

TITLE V OPERATING PERMIT

CERTIFICATION FOR SEMI-ANNUAL DEVIATION REPORT

SOURCE NAME: North American Resources Company - Ft. Lupton Plant

FACILITY IDENTIFICATION NUMBER: 1230319

PERMIT NUMBER: 99OPWE207

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: North American Resources Company - Ft. Lupton Plant
OPERATING PERMIT NO: 99OPWE207
REPORTING PERIOD: _____

I. Facility

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

___ During the entire reporting period this source was in compliance with all terms and conditions contained in the Permit, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified in the table below. The method used to determine compliance for each term and condition is the method specified in the Permit, unless otherwise indicated and described in the deviation report(s)

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

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
S001	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83891.								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
S002	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83892.								
S003	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83889.								
S004	Ajax DPC-540LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 514 HP, SN: 83890.								
S007	Fugitive VOC Emissions								
S008	Flare Industries 16" Model 250 Flare								
S009	Amine Treating Unit, Rated at 2,500 bbl/d of Natural Gas Liquids.								
S010	Elastec Smart Ash Model 100 Incinerator, SA18894, Design Rated at 48 lbs/hr and 0.4 MMBtu/hr.								
S012	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84286.								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
S013	Born Natural Gas Fired Amine Unit Heater, Design Rated at 10.7 MMBtu/hr, Model and SN: 2885-0.								
S014	Born, Inc Natural Gas Fired Hot Oil Heater, Design Rated at 32 MMBtu/hr, SN: 1963.								
S015	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84308.								
S016	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84288.								
S017	Ajax DPC-2803LE, 2-Cycle Lean Burn, Low NOx design, Natural Gas Fired Internal Combustion Engine, Site Rated at 550 HP, SN: 84287.								
S018	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1237.								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Compliance Status?[2]		Monitoring Method per Permit?[3]		Was Data Continuous?[4]	
		Previous	Current	IN	OUT	YES	NO	YES	NO
S019	Caterpillar G3516TALE, 4-Cycle Lean Burn, Natural Gas Fired Internal Combustion Engine, Site Rated at 980 HP, SN: 3RCO1240.								
General Conditions									
Insignificant Activities [5]									

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

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

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

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

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

II. Status for Accidental Release Prevention Program:

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

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

1. A Risk Management Plan _____ will be _____ has been submitted to the appropriate authority and/or the designated central location by June 20, 1999.

III. Certification

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

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

_____

Printed or Typed Name Title

_____

Signature Date Signed

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

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

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

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

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

Permit Modifications, Off Permit Changes:

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

APPENDIX E

Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42 -	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
EF -	Emission Factor
EPA -	Environmental Protection Agency
FI -	Fuel Input Rate in Lbs/mmBtu
FR -	Federal Register
G -	Grams
Gal -	Gallon
GPM -	Gallons per Minute
HAPs -	Hazardous Air Pollutants
HP -	Horsepower
HP-HR -	Horsepower Hour (G/HP-HR = Grams per Horsepower Hour)
LAER -	Lowest Achievable Emission Rate
LBS -	Pounds
M -	Thousand
MM -	Million
MMscf -	Million Standard Cubic Feet
MMscfd -	Million Standard Cubic Feet per Day
N/A or NA -	Not Applicable
NOx -	Nitrogen Oxides

NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
P -	Process Weight Rate in Tons/Hr
PE -	Particulate Emissions
PM -	Particulate Matter
PM_{10} -	Particulate Matter Under 10 Microns
PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION

APPENDIX G

VOC Testing Program

(See Next 5 pages)

APPENDIX H

Fuel Allocation

***The methods outlined will be used to calculate fuel use for Units S001-S004, S008, S012-S019**

A) FUEL ALLOCATION TO INDIVIDUAL UNITS

For Each Piece of Equipment, Fuel Use =

[Fuel Design Rate][Hrs. of Operation] X [Facility Fuel Use for Month]
[Sum of Numerator for Each Engine]

Unit Number	Fuel Design Rate	Unit Number	Fuel Design Rate
S001	4.01 MMBtu/hr	S014	32 MMBtu/hr
S002	4.01 MMBtu/hr	S015	4.46 MMBtu/hr
S003	4.01 MMBtu/hr	S016	4.46 MMBtu/hr
S004	4.01 MMBtu/hr	S017	4.46 MMBtu/hr
S008	6.11 MMBtu/hr	S018	7.38 MMBtu/hr
S012	4.46 MMBtu/hr	S019	7.38 MMBtu/hr
S013	10.7 MMBtu/hr		

*Allocated Fuel Use shall be determined within the first seven days of each month based on the monthly hours of operation for each listed piece of equipment from the previous month.