Colorado Department
of Public Health
and Environment

OPERATING PERMIT

BP AMERICA - WATTENBERG GAS PLANT

ISSUED SEPTEMBER 1, 2003
REVISED APRIL 13, 2007

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME: Wattenberg Gas Processing Plant

FACILITY ID: 0010025

ISSUE DATE: September 1, 2003
EXPIRATION September 1, 2008
MODIFICATIONS See Appendix F of Permit

OPERATING PERMIT NUMBER

95OPAD102

Issued in accordance with the provisions of the Colorado Air Pollution Prevention and Control Act, 25-7-101 et seq. and applicable rules and regulations.

ISSUED TO:

BP America Production Company
501 Westlake Park Boulevard
Houston, TX 77079

PLANT SITE LOCATION:

1909 Powhaton Road
Aurora, CO 80019

INFORMATION RELIED UPON
Operating Permit Application Received: December 8, 1995
And Additional Information Received: March 5, 1996, April 5, 2004, August 22, 2005

Nature of Business: Natural gas processing
Primary SIC: 1311

RESPONSIBLE OFFICIAL
Name: Dave Campbell
Title: South Performance Unit Leader

Phone: (281) 366-3851

FACILITY CONTACT PERSON
Name: Mike A. DeHerrera
Title: Plant Manager

Phone: (303) 261-6412

SUBMITTAL DEADLINES
Semi-Annual Monitoring Period: September 1 – end of February, March 1 – August 31
Semi-Annual Monitoring Report: April 1 & October 1, 2004 and subsequent years
Annual Compliance Period: Begins September 1 through August 31
Annual Compliance Certification: October 1, 2004 and subsequent years
Note that the Semi-Annual Monitoring reports and the Annual Compliance report must be received at the Division office by 5:00 p.m. on the due date. Postmarked dates will not be accepted for the purposes of determining the timely receipt of those reports.

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 The Wattenberg Gas Processing Plant is a sweet gas and natural gas liquids recovery plant designed to process up to 200 million standard cubic feet per day of natural gas and extract moisture and natural gas liquids from the gas stream prior to transmission to sales pipelines. The plant equipment includes natural gas-fired engine driven residue gas compressors, product treating and storage facilities, two propane refrigeration systems, a propane truck rack, a cogeneration turbine and an NGL railcar loading rack.

The facility is located approximately 20 miles east of Denver in Adams County. The area in which the plant operates is classified as attainment/maintenance for particulate matter less than 10 microns (PM_{10}), ozone and carbon monoxide. Under that classification, all SIP-approved requirements for VOC and CO will continue to apply in order to prevent backsliding under the provisions of Section 110(l) of the Federal Clean Air Act.

The plant is located within 100 kilometers of 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 Permit(s): 10AD275-2, 10AD275-4, 10AD275-6, 10AD275-7, C10,275-1, C10,275-2, C10,275-4, C10,275-6, C10,275-7, C13,358-1, C13,358-2, 85AD114-1, 85AD114-2, 86AD019, 89AD049, 93AD134, 97AD0805, 97AD0666, 97AD0667, 94AD053, 93AD399, 93AD899, 93AD270-1, 93AD270-2 and 01AD0534.

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 3g (last paragraph), 14 and 18 (as noted).

1.5 All information gathered pursuant to the requirements of this permit is subject to the Recordkeeping and Reporting requirements listed under Condition 22 of the General Conditions in Section IV of this permit.

1.6 The following physical or operational changes to the turbines listed in this permit are not considered a modification for purposes of NSPS GG, NSR/PSD, or Regulation No. 3:

1) Replacement of stator blades, turbine nozzles, turbine buckets, fuel nozzles, combustion chambers, seals, and shaft packings, provided that they are of the same design as the original.

2) Changes in the type or grade of fuel used, if the original gas turbine installation, fuel nozzles, etc. were designed for its use.

3) An increase in the hours of operation (unless limited by a permit condition)

4) Variations in operating loads within the engine design specification.

Turbines undergoing any of the above changes are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit. If replacement of any of the components listed in (1) above results in a change in serial number for the turbine, a letter explaining the action as well as a revised APEN and appropriate filing fee shall be submitted to the Division within 30 days of the replacement.

Note that the repair or replacement must be genuinely the same design. The Division does not consider that this allows for the entire replacement (or reconstruction) of an existing turbine with an identical new one or one similar in design or function. Rather, the Division considers the repair or replacements to encompass the repair or replacement of components of a turbine with the same (or functionally similar) components. Note that the new components cannot increase the power output capacity of the turbine and still meet the requirements of this exemption.

2. Alternative Operating Scenarios

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 Engine Replacement (ver 7/03)

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

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

2.1.1 Temporary Engine Replacement

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

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

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

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

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

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

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

noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period.

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

2.1.1.3 Temporary replacement engines, whether of the same manufacturer, model, and horsepower, or of a different manufacturer, model, or horsepower, are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping), and shall be subject to any shield afforded by this permit.

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

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

2.1.1.6 For comparison with an annual emissions limit, the results of any testing required by this AOS shall be multiplied by the maximum number of hours in the month (for rolling 12 month totals) or year (8760), whichever applies, in order to monitor compliance.

2.2 Turbine Replacement (ver 7/03)

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

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

2.2.1 Temporary Turbine Replacement

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

2.2.1.1 The permittee may temporarily replace an existing turbine provided such replacement turbines are Solar Model 10-1400 combustion turbines without modifying this permit.

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

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

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

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

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

2.2.1.2 The permittee may temporarily replace a grandfathered or permit exempt turbine or a turbine that is not subject to emission limits without modifying this permit. Potential emissions from the temporary replacement turbine must be less than or equal to the

potential emissions from the original grandfathered or permit exempt turbine or for the turbine that is not subject to emission limits, as determined by applying appropriate emission factors.

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

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

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

2.2.1.6 For comparison with an annual or short term emissions limit, data collected pursuant to this AOS shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation, the test results shall be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

2.3 Additional Sources

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

3. Prevention Of Significant Deterioration (PSD)

3.1 This facility is located in an area designated attainment for all pollutants. It is categorized as a major stationary source (Potential to Emit > 250 Tons/Year for NOx). Future modifications at this facility resulting in a significant net emissions increase (see Reg 3, Part D, Sections II.A.26 and 42) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.42 or a modification which is major by itself may result in the application of the PSD review requirements.

3.2 This facility is located in the 8-hr Ozone Control Area as defined in FR Vol. 69, No. 84, April 30, 2004.

3.3 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 Based on the information provided by the applicant, this facility is subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

5. MACT Applicability

5.1 This source falls under the Maximum Achievable Control Technology (MACT) source category of National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities, 40 CFR Part 63, Subpart HH.

6. Summary of Emission Units

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

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
P001	002	S001	Hot Oil Heater, Natural Gas Fired, Rated at 27.0 MMBtu/hr, Serial Number 73066	None
P002	008	S002	Broach Natural Gas Fired Regeneration Heater, Rated at 15.0 MMBtu/hr, Serial Number 75708	None
P003	011	S003	Entec Model 3HE-0223 HE 04008-E Natural Gas Fired Regeneration Heater, Rated at 4.1 MMBtu/hr, Serial Number 84-462	None
P004	012	S004	Eclipse Natural Gas Fired Series PR Steam Boiler, Rated at 16.8 MMBtu/hr, Serial Number 1252	None
P005 P006	021 022	S005 S006	Solar Model Saturn 10-1400 Natural Gas Fired Cogeneration Turbine, Rated at 14.5 MMBtu/hr, Serial Number 22879, with a Natural Gas Fired Duct Burner, Rated at 10.0 MMBtu/hr, Serial Number Not Provided	None
P010	018	S010	Waukesha Model 12V-AT25-GL Natural Gas Fired Internal Combustion Engine, Low NOx Design, Rated at 2,350 HP, Serial Number 10797-1	None
P011	004	S011	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 20834	None
P012	032	S012	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 265949	Oxidation Catalyst
P013	006	S013	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20843	Oxidation Catalyst
P014	007	S014	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20842	Oxidation Catalyst
P015	009	S015	Uniflux Natural Gas Fired Regeneration Heater, Rated at 12.0 MMBtu/hr, Serial Number 40140201	None
F019	031	S019	Propane Loadout Facility	None
F020	029	S020	Natural Gas Liquids/Inlet Gas Condition System Fugitive VOC Emissions	None
P021	027	S021	John Zink Model 801A Natural Gas Fired Thermal Oxidation Unit,	None

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
			Rated at 7.0 MMBtu/hr, Serial Number A02762-B-203-1	
F025	N/A	S025	Railcar Loading Station	None
F026	N/A	S026	Pressurized Hydrocarbon Storage Vessels	None
F027	N/A	S027	Slug Liquid Processing Unit Fugitive VOC Emissions	None
F028	N/A	S028	Facility Fugitive VOC Emissions	None
P029	N/A	S029	Facility Flare	None

SECTION II - Specific Permit Terms

1. P001 - G10-801 Hot Oil Heater

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	1.1	N/A	17.5 TPY	0.140 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	7.6 TPY	0.061 lb/MMBtu		
PM_{10}		N/A	1.8 TPY	0.014 lb/MMBtu		
Particulate	1.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	1.3	N/A	250.0 MMscf/yr	N/A	Fuel Meter	Daily
Opacity	1.4	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	1.5	N/A			ASTM Analysis Method	Semi-Annually
NSPS	1.6	N/A			As required in the NSPS General Provisions	

1.1 Nitrogen Oxide, Carbon Monoxide and PM_{10} emissions shall not exceed the limitations stated above (Colorado Construction Permit 10AD275-2). Monthly emissions of those pollutants shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/month} = (\text{EF}) \times (\text{Btu content, Btu/scf}) \times (\text{Fuel Use, MMscf/month})$$

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

1.2 Particulate emissions shall not exceed the limit, in pounds per million Btu, described by the equation above, where FI is the fuel input in million Btu per hour (Colorado Regulation No. 1, Section III.A.1). In the

absence of credible evidence to the contrary, compliance with the particulate emissions limit shall be presumed since only natural gas is permitted to be used as fuel for this heater.

1.3 Natural gas consumption shall not exceed the limitations stated above (Colorado Construction Permit 10AD275-2). Fuel use shall be measured and recorded daily, as required by 40 CFR Part 60 Subpart Dc §60.48c(g), as adopted by reference in Colorado Regulation No. 6, Part A. The monthly fuel consumption shall be summed and a. twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

1.5 The BTU Content of the natural gas used to fuel this unit shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 1.1 shall be made using the Btu content derived from the most recent required analysis.

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

1.6.1 No article, machine, equipment or process shall be used to conceal an emission 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).

1.6.2 Records of startups, shutdowns, and malfunctions shall be maintained (§60.7).

1.6.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§60.11(d)).

2. P002 - G10-280-B Broach Regeneration Heater

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	2.1	N/A	6.4 TPY	0.097 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	5.4 TPY	0.082 lb/MMBtu		
Particulate	2.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	2.3	N/A	131.4 MMscf/yr	N/A	Fuel Meter	Daily
Opacity	2.4	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	2.5	N/A			ASTM Analysis Method	Semi-Annually
NSPS	2.6	N/A			As required in the NSPS General Provisions	

2.1 Nitrogen Oxide and Carbon Monoxide emissions shall not exceed the limitations stated above (Colorado Construction Permit C13,358-2, as modified in accordance with the provisions of Section I, 1.3). Monthly emissions of those pollutants shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/month} = (\text{EF}) \times (\text{Btu content, Btu/scf}) \times (\text{Fuel Use, MMscf/month})$$

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

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

2.3 Natural gas consumption shall not exceed the limitations stated above (Colorado Construction Permit C13,358-2). Fuel use shall be measured and recorded daily, as required by 40 CFR Part 60 Subpart Dc

§60.48c(g), as adopted by reference in Colorado Regulation No. 6, Part A. The monthly fuel consumption shall be summed and a. twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

2.5 The BTU Content of the natural gas used to fuel this unit shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 2.1 shall be made using the Btu content derived from the most recent required analysis.

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

2.6.1 No article, machine, equipment or process shall be used to conceal an emission 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).

2.6.2 Records of startups, shutdowns, and malfunctions shall be maintained (§60.7).

2.6.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§60.11(d)).

3. P003 - G10-2801A Entec Regeneration Heater

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	3.1	N/A	1.8 TPY	0.100 lb/MMBtu	Recordkeeping and Calculation	Monthly
Particulate	3.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	3.3	N/A	36.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	3.4	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	3.5	N/A			ASTM Analysis Method	Semi-Annually

3.1 Nitrogen Oxide emissions shall not exceed the limitations stated above (Colorado Construction Permit 85AD114-1). Monthly emissions of that pollutant shall be calculated using the fuel-based emission factors in the following equation:

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

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

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

3.3 Natural gas consumption shall not exceed the limitations stated above (Colorado Construction Permit 85AD114-1). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

3.5 The BTU Content of the natural gas used to fuel this unit shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 3.1 shall be made using the Btu content derived from the most recent required analysis.

4. P004 - G2-1501 Eclipse Steam Boiler

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	4.1	N/A	7.2 TPY	0.098 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	6.1 TPY	0.083 lb/MMBtu		
Particulate	4.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	4.3	N/A	147.0 MMscf/yr	N/A	Fuel Meter	Daily
Opacity	4.4	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
	4.5	N/A			ASTM Analysis Method	Semi-Annually
NSPS	4.6	N/A			As required in the NSPS General Provisions	

4.1 Nitrogen Oxide and Carbon Monoxide emissions shall not exceed the limitations stated above (Colorado Construction Permit 85AD114-2, as modified in accordance with the provisions of Section I, 1.3). Monthly emissions of those pollutants shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/month} = (\text{EF}) \times (\text{Btu content, Btu/scf}) \times (\text{Fuel Use, MMscf/month})$$

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

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

4.3 Natural gas consumption shall not exceed the limitations stated above (Colorado Construction Permit 85AD114-2). Fuel use shall be measured and recorded daily, as required by 40 CFR Part 60 Subpart Dc §60.48c(g), as adopted by reference in Colorado Regulation No. 6, Part A. The monthly fuel consumption shall be summed and a. twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

4.5 The BTU Content of the natural gas used to fuel this unit shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 4.1 shall be made using the Btu content derived from the most recent required analysis.

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

4.6.1 No article, machine, equipment or process shall be used to conceal an emission 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).

4.6.2 Records of startups, shutdowns, and malfunctions shall be maintained (§60.7).

4.6.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§60.11(d)).

5. P005, P006 - Solar Saturn 1,100 HP Natural Gas-Fired Turbine and Duct Burner

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	5.1, 5.2, 19.1	150 ppmvd*	19.3 tpy**	See Condition 5.1	Recordkeeping and Calculation, Monitoring with a Portable Flue Gas Analyzer (See Cond. 19.1), Stack Test (See Cond. 5.2)	Monthly, Quarterly, One Time
CO		N/A	56.3 tpy**	See Condition 5.1		
SO_2	5.3	150 ppmvd* or 0.8 wt% S in fuel	N/A	N/A	Fuel Restriction	Annual Certification
	5.4	0.8 lb/MMBtu	N/A	N/A	Fuel Restriction	Annual Certification
Particulate	5.5	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	5.6	N/A	198.0 MMScf/yr	N/A	Individual Fuel Meters	Monthly, Daily
Opacity	5.7	Less than or equal to 20%		N/A	Fuel Restriction	Semi-Annually
Btu Content	5.8	N/A			ASTM Methods	Semi-Annually
NSPS	5.9	N/A			N/A	As required in the NSPS General Provisions

* At 15% O_2 and ISO conditions as measured by Test Method 20
** Combined emissions for the turbine and the duct burner

5.1 Nitrogen Oxide and Carbon Monoxide emissions shall not exceed the limitations stated above (Construction Permit 86AD019, as modified in accordance with the provisions of Section I, 1.3). The emission factors listed below have been approved by the Division and shall be used to calculate emissions from these units, except that if a reference method test is conducted under the provisions of condition 19.1, and the results of the testing show emissions of any pollutant to be above the emission factors listed below, the emission factor determined during that test and approved by the Division shall be used starting with the month that the test was performed and for all subsequent calculations**.** In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing are below the emission factor listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by condition 19.1

demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors (based on Manufacturer's data), the monthly fuel consumption, and the higher heating value of the fuel in the following equation:

$$\text{lb/month} = (\text{EF, lbs/MMBtu}) \times (\text{Fuel Heating Value, Btu/scf}) \times (\text{Fuel Use, MMscf/month})$$

The calculated emissions shall be the total emissions from the turbine and duct burner. The amount of fuel burned by the turbine and by the duct burner shall be multiplied by the appropriate emission factor to determine the total emissions of each pollutant. The emissions from the turbine shall be calculated by multiplying the fuel burned by the turbine times each turbine emission factor; the emissions from the duct burner shall be calculated by multiplying the fuel burned by the duct burner times each duct burner emission factor. The emission factors to be used for calculating emissions are summarized below.

Turbine P005 and Duct Burner P006 Emission Factors

Pollutant	Turbine	Duct Burner
NOx	0.243 lb/MMBtu	0.098 lb/MMBtu
CO	0.830 lb/MMBtu	0.082 lb/MMBtu

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

5.2 As an initial demonstration of compliance with the permit limits, a compliance test for this turbine shall be conducted to measure the emission rates of nitrogen oxides and carbon monoxide using EPA approved methods or other methods approved by the Division. An additional compliance test shall be conducted near the end of the permit term. Any stack tests conducted to show compliance with a monthly or annual emission limit shall have the results projected to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time. If there are no restrictions, the default multipliers shall be 744 hours per month and 8,760 hours per year.

The compliance testing shall be completed and copies of the results provided to the Division within 365 calendar days of the issuance of this Operating Permit and within 365 calendar days prior to the expiration of this Operating Permit. A compliance testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to any performance of the test required under this condition. No compliance test required herein shall be performed without prior written approval of the protocol by the Division. The Division reserves the right to witness the test. In order to facilitate the Division's ability to make plans to witness the test, notice of the date(s) for the compliance test shall be submitted to the Division at least thirty (30) calendar days prior to the test. The Division may for good cause shown, waive this thirty(30) day notice requirement. In

instances when a scheduling conflict is presented, the Division shall immediately contact the permittee in order to explore the possibility of making modifications to the stack test schedule. The required number of copies of the compliance test results shall be submitted to the Division within forty-five (45) calendar days of the completion of the test unless a longer period is approved by the Division.

5.3 The turbine is subject to NSPS Subpart GG - Standards of Performance for Stationary Gas Turbines. Emissions of sulfur dioxide shall be limited by complying with one of the conditions described in 5.3.1 and 5.3.2. In the absence of credible evidence to the contrary, compliance with these standards shall be presumed whenever natural gas is used as fuel for this turbine.

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

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

5.4 Emissions of sulfur dioxide from this turbine shall not exceed 0.8 pounds per million Btu of heat input (Colorado Regulation No. 1, Section VI.B.4). In the absence of credible evidence to the contrary, compliance with this standard shall be presumed since only natural gas is permitted to be used as fuel for this unit.

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

5.6 Total fuel consumption shall not exceed the limitation stated above (Construction Permit 86AD019). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

The duct burner is subject to NSPS Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. Duct burner fuel use shall be measured and recorded daily, as required by 40 CFR Part 60 Subpart Dc §60.48c(g), as adopted by reference in Colorado Regulation No. 6, Part A.

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

5.8 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 5.1 shall be made using the Btu content derived from the most recent required analysis.

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

5.9.1 No article, machine, equipment or process shall be used to conceal an emission 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).

5.9.2 Records of startups, shutdowns, and malfunctions shall be maintained (§60.7).

5.9.3 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Division which may include, but is not limited to monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source (§60.11(d)).

6. P010 - Waukesha 2,350 HP Internal Combustion Engine

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	6.1, 19.1	N/A	34.0 TPY	0.422 lb/MMBtu	Recordkeeping and Calculation, Monitoring with a Portable Flue Gas Monitor (see Cond. 19.1)	Monthly, Quarterly
CO		N/A	56.7 TPY	0.703 lb/MMBtu		
VOC	6.1	N/A	6.9 TPY	0.086 lb/MMBtu	Recordkeeping and Calculation	Monthly
Natural Gas Use	6.2	N/A	161.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	6.3	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	6.4	N/A			ASTM Methods	Semi-Annually

6.1 Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit 93AD134, as modified in accordance with the provisions of Section I, 1.3).

The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this engine, except that if a reference method test is conducted under the provisions of condition 19.1, and the results of the testing show emissions of any pollutant to be above the emission factors listed above, the emission factor determined during that test and approved by the Division shall be used starting with the month that the test was performed and for all subsequent calculations**.** In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing are below the emission factor listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by condition 19.1 demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors (based on the hourly Construction Permit limit) in the following equation:

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

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

6.2 Natural gas consumption shall not exceed the limitation stated above (Colorado Construction Permit 93AD134). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

6.4 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 6.1 shall be made using the Btu content derived from the most recent required analysis.

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

7. P011 - Superior 2,225 HP Internal Combustion Engine

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	7.1	N/A	234.2 TPY	2.71 lb/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	34.3 TPY	0.397 lb/MMBtu		
VOC		N/A	11.3 TPY	0.131 lb/MMBtu		
Natural Gas Use	7.2	N/A	173.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	7.3	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	7.4	N/A			ASTM Methods	Semi-Annually

7.1 Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit C-10, 275-4, as modified by Revised APENs submitted 5/2001 in accordance with the provisions of Section I, 1.3).

The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this engine, except that if a reference method test is conducted under the provisions of condition 19.1, and the results of the testing show emissions of any pollutant to be above the emission factors listed above, the emission factor determined during that test and approved by the Division shall be used starting with the month that the test was performed and for all subsequent calculations**.** In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing are below the emission factor listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by condition 19.1 demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/month} = (\text{EF}) \times (\text{Btu content, Btu/scf}) \times (\text{Fuel Use, MMScf/month})$$

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

7.2 Natural gas consumption shall not exceed the limitation stated above (Colorado Construction Permit C-10, 275-4). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

7.4 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the lower heating value of the fuel. Calculations of monthly emissions required under Condition 7.1 shall be made using the Btu content derived from the most recent required analysis.

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

8. P012 - Superior 2,225 HP Internal Combustion Engine

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	8.1, 19.1	N/A	234.2 TPY	2.71 lb/MMBtu	Recordkeeping and Calculation, Monitoring with a Portable Flue Gas Monitor (see Cond. 19.1)	Monthly, Quarterly
CO		N/A	2.0 TPY	0.0234 lb/MMBtu		
VOC		N/A	4.9 TPY	0.0565 lb/MMBtu		
Natural Gas Use	8.2	N/A	173.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	8.3	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	8.4	N/A			EPA Methods	Semi-Annually
Engine and Catalyst Operation and Maintenance	8.5	N/A			See Condition 8.5	

8.1 Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permit 97AD0805, as modified by Revised APENs submitted 8/2005 in accordance with the provisions of Section I, 1.3).

The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this engine, except that if a reference method test is conducted under the provisions of condition 19.1, and the results of the testing show emissions of any pollutant to be above the emission factors listed above, the emission factor determined during that test and approved by the Division shall be used starting with the month that the test was performed and for all subsequent calculations**.** In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing are below the emission factor listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by condition 19.1 demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors in the following equation:

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

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

8.2 Natural gas consumption shall not exceed the limitation stated above (Colorado Construction Permit 97AD0805). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

8.4 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the lower heating value of the fuel. Calculations of monthly emissions required under Condition 8.1 shall be made using the Btu content derived from the most recent required analysis.

8.5 This engine shall utilize an oxidation catalyst to control VOC emissions as required by Colorado Regulation No. 7, Section XVI. The engine and associated oxidation catalyst shall be operated and maintained in accordance with manufacturer's recommendations at all times, including periods of start-up, shutdown, and malfunction. Engine and catalyst operating parameters shall be monitored as follows:

8.5.1 Catalyst Inlet Temperature

The catalyst inlet gas temperature shall be monitored and recorded daily. The inlet temperature shall be within the manufacturer's recommended range. During those months when portable monitoring is scheduled, inlet temperature shall be monitored and recorded during the portable monitoring event. If the temperature is outside of the manufacturer's recommended range, the source shall perform any necessary maintenance or adjustments. Records of the data and any maintenance or adjustments performed shall be maintained for Division inspection upon request.

8.5.2 Catalyst Pressure Drop

Pressure drop across the catalyst shall be monitored and recorded monthly to assess engine and catalytic oxidizer operating condition. The pressure drop shall be within the manufacturer's recommended range. During those months when portable monitoring is scheduled, catalyst pressure drop shall be monitored and recorded during the portable monitoring event. If the pressure drop is outside of the manufacturer's recommended range, the source shall perform any necessary maintenance or adjustments. Records of

the data and any maintenance or adjustments performed shall be maintained for Division inspection upon request.

8.5.3 Engine Exhaust Oxygen Concentration

The engine exhaust oxygen content shall be monitored and recorded to assess engine operating conditions. During those calendar months when portable monitoring is scheduled this parameter is to be monitored and recorded during the portable monitoring event. Records of the data shall be maintained for Division inspection upon request.

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

9. P013, P014 - Superior 1,100 HP Internal Combustion Engines

Parameter	Permit Condition	Limitations (per engine) Short Term	Long Term	Compliance Emission Factor	Monitoring Method	Interval
NOx	9.1, 19.1	N/A	128.0 TPY	2.98 lb/MMBtu	Recordkeeping and Calculation, Monitoring with a Portable Flue Gas Monitor (see Cond. 19.1)	Monthly, Quarterly
CO		N/A	1.0 TPY	0.0234 lb/MMBtu		
VOC		N/A	2.6 TPY	0.0615 lb/MMBtu		
Natural Gas Use	9.2	N/A	86.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	9.3	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	9.4	N/A			ASTM Methods	Semi-Annually
Engine and Catalyst Operation and Maintenance	9.5	N/A			See Condition 9.5	

9.1 Nitrogen Oxide and Volatile Organic Compound emissions shall not exceed the limitations stated above (Colorado Construction Permits C-10,275-6 and C-10,275-7, as modified by Revised APENs submitted 8/2005 in accordance with the provisions of Section I, 1.3).

The emission factors listed above have been approved by the Division and shall be used to calculate emissions from these engines, except that if a reference method test is conducted under the provisions of condition 19.1, and the results of the testing show emissions of any pollutant to be above the emission factors listed above, the emission factor determined during that test and approved by the Division shall be used starting with the month that the test was performed and for all subsequent calculations**.** In addition, the permittee shall apply for a modification to this permit to reflect the higher emission factor within 30 days of Division approval of the new emission factor.

If the results of the reference method testing are below the emission factor listed above, emissions may be calculated using the new (lower) emission factor provided that subsequent testing as required by condition 19.1 demonstrates compliance with this new factor. If the source chooses to use the new lower emission factor, the permittee shall apply for a modification to this permit to reflect the lower emission factor within 30 days of Division approval of the new emission factor.

Monthly emissions of each pollutant shall be calculated using the fuel-based emission factors in the following equation:

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

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

9.2 Natural gas consumption shall not exceed the limitation stated above (Colorado Construction Permits C-10,275-6 and C-10,275-7). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

9.4 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the lower heating value of the fuel. Calculations of monthly emissions required under Condition 9.1 shall be made using the Btu content derived from the most recent required analysis.

9.5 Each engine shall utilize an oxidation catalyst to control VOC emissions as required by Colorado Regulation No. 7, Section XVI. The engines and associated oxidation catalysts shall be operated and maintained in accordance with manufacturer's recommendations at all times, including periods of start-up, shutdown, and malfunction. Engine and catalyst operating parameters shall be monitored as follows:

9.5.1 Catalyst Inlet Temperature

The catalyst inlet gas temperature shall be monitored and recorded daily. The inlet temperature shall be within the manufacturer's recommended range. During those months when portable monitoring is scheduled, inlet temperature shall be monitored and recorded during the portable monitoring event. If the temperature is outside of the manufacturer's recommended range, the source shall perform any necessary maintenance or adjustments. Records of the data and any maintenance or adjustments performed shall be maintained for Division inspection upon request.

9.5.2 Catalyst Pressure Drop

Pressure drop across the catalyst shall be monitored and recorded monthly to assess engine and catalytic oxidizer operating condition. The pressure drop shall be within the manufacturer's recommended range. During those months when portable monitoring is scheduled, catalyst pressure drop shall be monitored

and recorded during the portable monitoring event. If the pressure drop is outside of the manufacturer's recommended range, the source shall perform any necessary maintenance or adjustments. Records of the data and any maintenance or adjustments performed shall be maintained for Division inspection upon request.

9.5.3 Engine Exhaust Oxygen Concentration

The engine exhaust oxygen content shall be monitored and recorded to assess engine operating conditions. During those calendar months when portable monitoring is scheduled this parameter is to be monitored and recorded during the portable monitoring event. Records of the data shall be maintained for Division inspection upon request.

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

10. P015 - G10-2802B Uniflux Regeneration Heater

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	10.1	N/A	2.73 TPY	0.140 lb/MMBtu	Recordkeeping and Calculation	Monthly
Particulate	10.2	$0.5(FI)^{-0.26}$	N/A	N/A	Fuel Restriction	Annual Certification
Natural Gas Use	10.3	N/A	39.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	10.4	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Btu Content	10.5	N/A			ASTM Analysis Method	Semi-Annually

10.1 Nitrogen Oxide emissions shall not exceed the limitations stated above (Colorado Construction Permit C13,358-1). Monthly emissions of that pollutant shall be calculated using the fuel-based emission factors in the following equation:

$$\text{lb/month} = (\text{EF}) \times (\text{Btu content, Btu/scf}) \times (\text{Fuel Use, MMscf/month})$$

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

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

10.3 Natural gas consumption shall not exceed the limitations stated above (Colorado Construction Permit C13,358-1). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

10.5 The BTU Content of the natural gas used to fuel the engine shall be determined semi-annually using the appropriate ASTM method or equivalent, if approved by the Division. The Btu content of the natural gas shall be based on the higher heating value of the fuel. Calculations of monthly emissions required under Condition 10.1 shall be made using the Btu content derived from the most recent required analysis.

11. F019 - Propane Loadout VOC Emissions

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC	11.1	N/A	4.7 tons/yr	N/A	Recordkeeping	Annual Certification
Propane Loadout	11.2	N/A	30,660,000 gallons/yr	N/A	Recordkeeping	Annual Certification

11.1 Emissions of VOC shall not exceed the limitation stated above (Colorado Construction Permit 97AD0667). Compliance with the annual emission limit shall be assumed if the volume of propane loaded annually does not exceed the limit stated above.

11.2 This source shall be limited to a maximum loadout of propane not to exceed 30,660,000 gallons per year (Colorado Construction Permit 97AD0667). A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

Loadout shall be into LPG type tanker trucks which release no emissions to the atmosphere during the loading process, except for loading hose hookup and removal.

12. F020 - Natural Gas Liquids/Inlet Gas Conditioning Unit Fugitive VOC Emissions

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC	12.1	N/A	43.3 tons/yr	By Component - EPA Protocol for Equipment Leak Estimates	Recordkeeping	Annual Certification
Leak Detection and Repair	12.2	N/A			See Condition 12.2	

12.1 Emissions of VOC shall not exceed the limitation stated above (Colorado Construction Permit 94AD053, as modified in accordance with the provisions of Section I, 1.3). Emissions shall be calculated using the emission factors and equations listed below. A component count shall be maintained and adjusted annually to determine the existing hardware inventory. This can be accomplished by conducting an actual component count before the permit is issued and then maintaining records of component additions and deletions.

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

	Gas	Condensate
Valves	9.92E-03	5.51E-03
Relief Valves	1.94E-02	1.65E-02
Compressor Seals	1.94E-02	1.65E-02
Flanges	8.60E-04	2.43E-04
Open-ended Lines	4.41E-03	3.09E-03
Pump Seals	5.29E-03	2.86E-02
Connectors	4.41E-04	4.63E-04

Annual Emissions of VOC per Component:

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

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

A gas analysis shall be conducted annually. The results of this analysis shall be used to determine the appropriate %VOC to use in the above equation.

12.2 This source shall comply with the requirements of Colorado Regulation No. 7, Section XII.B.1. The following leak detection and repair program items provided at 40 C.F.R. Part 60, Subpart KKK shall apply:

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

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

12.2.3 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.

13. P021 - TEG Dehydration Unit/CPTS Amine Unit/Thermal Oxidation Unit

Parameter	Permit Condition	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	13.1, 13.3	N/A	3.2 tons/yr	0.73 lbs/hr	Recordkeeping and Calculation, Performance Test (See Condition 13.3)	Monthly, One Time
CO		N/A	7.4 tons/yr	1.69 lbs/hr		
VOC		N/A	8.8 tons/yr	2.01 lbs/hr		
SO_2		N/A	15.0 tons/yr	3.43 lbs/hr		
H_2S		N/A	0.4 tons/yr	0.09 lbs/hr		
Hours of Operation	13.2	N/A	N/A	N/A	Recordkeeping	Monthly
Natural Gas Processed	13.4	N/A	4,745 MMscf/yr	N/A	Flow Meter	Monthly
Control Device Operation	13.5, 13.8	Thermal Oxidizer Operating at 1,400 °F		N/A	Temperature Indicator	Daily
Control Device Natural Gas Use	13.6	N/A	42.0 MMscf/yr	N/A	Fuel Meter	Monthly
Opacity	13.7	Less than or equal to 20%		N/A	Fuel Restriction	Annual Certification
Flare Operation	13.9	A flame must be present at all times during which the dehydration unit is running		N/A	Flame Indicator	At All Times
Benzene Emissions	13.10	N/A		N/A	Subject to NESHAP HH	Subject to NESHAP HH

13.1 Emissions of Nitrogen Oxides, Carbon Monoxide, Volatile Organic Compounds, Sulfur Dioxide and Hydrogen Sulfide shall not exceed the limitations stated above (Colorado Construction Permit 93AD899, as modified in accordance with the provisions of Section I, 1.3). The emission factors listed above have been approved by the Division and shall be used to calculate emissions from this unit.

13.2 Hours of operation shall be monitored monthly for both the amine regeneration unit and the thermal oxidizer and recorded in a log to be made available to the Division upon request. Recorded data shall be multiplied by the Compliance Emission Factors to calculate emissions for determination of annual fees and APEN reporting. VOC, SO_2 and H_2S emissions shall be calculated by multiplying the hours of operation of the amine regeneration unit by the appropriate emission factor. NOx and CO emissions shall be calculated by multiplying the hours of operation of the thermal oxidizer by the NOx and CO emission factors.

13.3 A performance test shall be conducted within six (6) months of permit issuance to verify compliance with the VOC, NOx, SO_2, H_2S and CO emission limits. If the performance test indicates compliance with the emission limits then future compliance shall be demonstrated as required under conditions 13.1-13.2. Tests shall be conducted using a protocol approved by the Division. A compliance testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to any performance of the test required under this condition. No compliance test required herein shall be performed without prior written approval of the protocol by the Division. The Division reserves the right to witness the test. In order to facilitate the Division's ability to make plans to witness the test, notice of the date(s) for the compliance test shall be submitted to the Division at least thirty (30) calendar days prior to the test. The Division may for good cause shown, waive this thirty(30) day notice requirement. In instances when a scheduling conflict is presented, the Division shall immediately contact the permittee in order to explore the possibility of making modifications to the stack test schedule. The required number of copies of the compliance test results shall be submitted to the Division within forty-five (45) calendar days of the completion of the test unless a longer period is approved by the Division.

13.4 The cubic feet of gas processed by the TEG dehydration unit shall not exceed the limitation listed above (Construction Permit 93AD270-3, as modified under Section I). The gas throughput to the dehydration unit shall be recorded monthly using a flow meter. A twelve month rolling total will be maintained to verify compliance with the annual limitation.

13.5 Emissions from the CPTS amine regeneration unit and the dehydration unit shall be routed to a thermal oxidizer capable of destroying VOC compounds by at least 96%, or to a flare if the thermal oxidizer is inoperable. The emissions shall not be routed to the thermal oxidizer if it is not operating at, or above, the temperature listed above. Neither the regeneration unit nor the dehydration unit shall be in operation if the emissions are not routed to either the flare or the thermal oxidizer. The operating temperature of the thermal oxidizer shall be recorded daily.

13.6 Natural gas consumption by the thermal oxidizer shall not exceed the limitation stated above (Colorado Construction Permit 93AD899). Fuel use shall be measured and recorded within the first seven (7) days of each month. A twelve-month rolling total shall be maintained for demonstration of compliance with the annual limitation. Each month a new twelve month total shall be calculated using the previous twelve months data.

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

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

13.9 Emissions from the CPTS amine regeneration unit and the dehydration unit shall be routed to Unit P029, the facility flare, during periods when the thermal oxidizer is inoperable. The emissions attributable to this re-routing shall calculated according to the procedure described in Section II, 18.1. Emissions shall not be routed to the flare if a flame is not present in the flare. A device must be installed and maintained to indicate the

presence of a flame (e.g. fire eye). Neither the regeneration unit nor the dehydration unit shall be in operation if the emissions are not routed to either the flare or the thermal oxidizer.

13.10 This source is subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. The source shall maintain records as specified below for each glycol dehydration unit that is not controlled according to the requirements of §63.764(c)(1)(i):

13.10.1 The actual annual average natural gas throughput (in terms of natural gas flowrate to the glycol dehydration unit per day) as determined in accordance with §63.772(b)(1), or

13.10.2 The actual average benzene emissions (in terms of benzene emissions per year) as determined in accordance with §63.772(b)(2).

14. F025 – Railcar Loading Station

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC (from railcar connection)	14.1	N/A	2.9 tons/yr	0.838 lbs per connection	Recordkeeping	Monthly
VOC (from component leaks)				By Component - EPA Protocol for Equipment Leak Estimates	Recordkeeping	Annual Certification
Number of railcars loaded	14.2	N/A	3,600 railcars/yr	N/A	Recordkeeping	Monthly

14.1 Emissions of VOC shall not exceed the limitation stated above (Colorado Construction Permit 01AD0534, as modified in accordance with the provisions of Section I, 1.3). Emissions shall be calculated using the emission factors and equations listed below. A component count shall be maintained and adjusted annually to determine the existing hardware inventory. This can be accomplished by conducting an actual component count before the permit is issued and then maintaining records of component additions and deletions.

Railcar Emissions

Annual Emissions of VOC from railcars:

(Number of Railcars Loaded/year) × (Railcar Emission Factor)

Component Emissions

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

	Gas	Condensate
Valves	9.92E-03	5.51E-03
Relief Valves	1.94E-02	1.65E-02
Compressor Seals	1.94E-02	1.65E-02
Flanges	8.60E-04	2.43E-04
Open-ended Lines	4.41E-03	3.09E-03
Pump Seals	5.29E-03	2.86E-02
Connectors	4.41E-04	4.63E-04

Annual Emissions of VOC per Component:

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

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

Total Emissions

Total annual VOC emissions will be the sum of the fugitive emissions and the railcar emissions.

14.2 The number of railcars loaded shall not exceed the limits listed in the table above (Colorado Construction Permit 01AD0534). Compliance with the annual limits shall be determined on a rolling twelve month total. By the end of each month a new twelve month total is calculated using the previous twelve months' data. The permittee shall maintain records of monthly railcar throughput and twelve month rolling total calculations for inspection upon request.

15. F026 – Pressurized Hydrocarbon Storage Vessels
One (1) Liquid Ethane-Propane Storage Tank
Four (4) Liquid Propane Storage Tanks
One (1) Stabilized Condensate Storage Tank

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC Emissions	15.1	N/A		N/A	Subject to NESHAP HH	Subject to NESHAP HH

15.1 These tanks are subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. The source shall operate each storage vessel with no detectable emissions at all times that material is in the storage vessel, except for the use of safety devices as provided for in §63.766(c).

16. F027 – Slug Liquid Processing Unit Fugitive VOC Emissions

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC Emissions	16.1, 16.2	N/A		N/A	Subject to NESHAP HH	Subject to NESHAP HH

16.1 Ancillary equipment contained within the Slug Liquid Processing Unit is subject to 40 CFR Part 63, Subpart HH, National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. Equipment that is in VHAP service, as defined in §63.761, shall comply with the requirements for equipment leaks specified in §63.769 and as described in 40CFR, Part 61, National Emission Standards for Hazardous Air Pollutants, §61.241 through §61.247.

16.2 Ancillary equipment contained within the Slug Liquid Processing Unit is exempt from the requirements described in §63.764(c)(3) if the criteria listed in §63.764(e)(2)(i) (equipment contacts fluids having a VHAP concentration less than 10 wt%) or §63.764(e)(2)(ii) (equipment operates in VHAP service less than 300 hours per calendar year) are met. Records of the determination of these criteria must be maintained as required in §63.774(d)(2).

17. F028 - Facility Fugitive VOC Emissions

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
VOC	17.1	N/A	54.5 tons/yr	By Component - EPA Protocol for Equipment Leak Estimates	Recordkeeping	Annual Certification
General Provisions	17.2	N/A	N/A	N/A	Subject to NSPS General Provisions	Subject to NSPS General Provisions
Leak Detection and Repair	17.3	N/A	N/A	N/A	Subject to NSPS KKK	Subject to NSPS KKK

17.1 This emission point consists of equipment from the Depropanizer Unit, the Inlet Gas/Liquid Measurement System, the Central Product Treatment System and the Natural Gas Liquids System. VOC emissions from equipment leaks shall not exceed the limitation stated above (Colorado Construction Permits 97AD0666, 93AD399, 93AD270-1 and 93AD270-2, as modified in accordance with the provisions of Section I, 1.3). Emissions shall be calculated using the emission factors and equations listed below. A component count shall be maintained and adjusted annually to determine the existing hardware inventory. This can be accomplished by conducting an actual component count before the permit is issued and then maintaining records of component additions and deletions.

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

	Gas	Condensate
Valves	9.92E-03	5.51E-03
Relief Valves	1.94E-02	1.65E-02
Compressor Seals	1.94E-02	1.65E-02
Flanges	8.60E-04	2.43E-04
Open-ended Lines	4.41E-03	3.09E-03
Pump Seals	5.29E-03	2.86E-02
Connectors	4.41E-04	4.63E-04

Annual Emissions of VOC per Component:

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

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

A gas analysis shall be conducted annually. The results of this analysis shall be used to determine the appropriate %VOC to use in the above equation.

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

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

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

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

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

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

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

17.3.4 The source shall submit a report detailing the specific applicable and non-applicable sections of NSPS KKK to the Division within 6 months of the permit issue date.

18. P029 - Facility Flare

Parameter	Permit Condition Number	Limitations Short Term	Limitations Long Term	Compliance Emission Factor	Monitoring Method	Monitoring Interval
NOx	18.1	N/A	7.7 tons/yr	0.1381 lbs/MMBtu	Recordkeeping and Calculation	Monthly
CO		N/A	15.3 tons/yr	0.2755 lbs/MMBtu		
VOC		N/A	25.3 tons/yr	0.46 lbs/MMBtu		
Flare Gas Throughput	18.2	2.0 MMscf/d	55.0 MMscf/yr	N/A	Recordkeeping	Daily, Annually
Flare Operating Requirements	18.3	Flare Shall be Operated at all Times that Flare Gas is Vented		N/A	Certification	Annually
		A Flame Shall be Present at all times that the Flare is Operated			See Condition 18.3	
		Visible Emissions/Opacity Requirements			Visible Emission Observations	Monthly

18.1 NO_X, CO and VOC emissions shall not exceed the above limitations (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Sections I.A.7 and III.B.7, based on the APEN submitted on August 22, 2005). Monthly emissions of each pollutant shall be calculated using the listed emission factors in the following equation:

$$\text{Tons/mo} = \frac{(\text{EF, lbs/MMBtu}) \times (\text{Monthly flare gas throughput, scf}) \times (\text{Flare gas heating value, MMBtu/scf})}{2000 \text{ lbs/ton}}$$

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

18.2 The cubic feet of gas sent to this unit shall not exceed the limitation stated above (as provided for under the provisions of Section I, Condition 1.3 and Colorado Regulation No. 3, Part C, Sections I.A.7 and III.B.7, based on the APEN submitted on August 22, 2005). The gas throughput to the flare shall be recorded daily using existing flow meters and monthly totals shall be maintained. A twelve month rolling total will be maintained to monitor compliance with annual throughput limitation.

18.3 The flare is subject to the following requirements:

18.3.1 The flare shall be operated at all times when emissions may be vented to it.

18.3.2 The flare shall be operated with a flame present at all times. The presence of a flare pilot flame shall be monitored continuously using a thermocouple, ultraviolet/infrared detector or any other equivalent device to detect the presence of the flame.

18.3.3 The flare is subject to the following visible emission requirements:

18.3.3.1 Flares shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 5 minutes during any 2 consecutive hours. Compliance with the visible emission requirements shall be monitored by conducting a visible emission observation monthly when the flare is operating. Monthly observations shall last a minimum of five minutes. If no visible emissions are present during this observation, in the absence of credible evidence to the contrary, the flare will be considered in compliance with the above visible emissions requirement. If visible emissions are present during the monthly reading, a two (2) hour observation shall be conducted in accordance with Method 22 to determine if the flare is in compliance with the above visible emissions requirement. During the Method 22 observation, if visible emissions persist for longer than fifteen (15) continuous minutes, the cause shall be determined and corrective actions taken. A record of the existing condition and the action taken shall be maintained and made available to the Division for review upon request.

18.3.3.2 No owner or operator of a smokeless flare or other flare for the combustion of waste gases shall allow or cause emissions into the atmosphere of any air pollutant which is in excess of 30% opacity for a period or periods aggregating more than six minutes in any sixty consecutive minutes (Colorado Regulation No. 1, Section II.A.5). In the absence of credible evidence to the contrary, compliance with this opacity requirement shall be presumed provided the requirements in Condition 18.3.3.1 are met.

18.3.4 Owners or operators of flares shall monitor these control devices to assure that they are operated and maintained in conformance with their designs.

19. Portable Monitoring Requirements (ver 8/02)

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

A portable monitor testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to the initial test. The protocol shall include examples of all calculations to be used to determine the emission rates and factors set forth below. Written approval of the protocol must be received prior to any testing. Prior Division-approved protocols for either the facility or the owner/operator may be used without additional review. For the initial test, 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 unit. For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies. For comparison with the emission rate/factor shown in the emission limit table, the results of the tests shall be converted to the same units as the emission rate/factor.

An exceedance of either the NO_X or CO emission limitation or either the NO_X or CO emission rates/factors shown in the emission limit table 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 as well as verifying that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit within 14 operating days of the initial test. Calibration gases shall be used to calibrate the portable analyzer for all tests conducted subsequent to the initial test.

Note that if the unit is operated for any period of time during a day, then that day counts as an operating day.

If the portable flue gas analyzer results indicate compliance with both the NO_X and CO emission limitations and verifies both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit within the 14 day period, the source may certify that the unit is in compliance with both the NO_X and CO emission limitations for the relevant time period.

If the portable flue gas analyzer results fail to indicate compliance with either the NO_X or CO emission limitations or fail to verify that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit 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 such testing and the associated calculations 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 (40C.F.R. Part 60 Appendix A), hereinafter AEPA 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**.** A compliance testing protocol shall be submitted for Division approval at least thirty (30) calendar days prior to the test. The protocol shall include examples of all calculations to be used to determine the emission rates set forth below. Written approval of the protocol must be received prior to any 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. Results of all Reference Method tests and the associated calculations required below shall be submitted to the Division within 30 calendar days of the test.

For comparison with an annual or short term emission limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies. For comparison with the emission rates/factors shown in each emission limit table, the emission rates determined by the tests and approved by the Division shall be converted to the same units as the emission rates/factors in the permit. If the EPA Reference Test results indicate compliance with both the NO_X and CO emission limitations and verify that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit, the source may certify that the unit 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 credible evidence to the contrary, the unit will be considered to be out of compliance from the date of the initial portable flue gas analyzer test until the unit is taken off line. If the EPA Reference Tests fail to verify that both the NO_X and CO emission rates/factors are less than or equal to those set forth in the permit, the source shall re-calculate all twelve month rolling total, annual, or short-term emissions (whichever apply) using the emission rates determined by the tests and approved by the Division since the last Division-approved EPA Reference Tests using the procedures set forth in condition 2.1.1. In the absence of credible evidence to the contrary, the unit will be considered to be out of compliance for any periods that the calculated emissions are greater that the NO_X or CO emission limitations.

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 C, §§ I.A.4, V.D. & XIII.B; § 25-7-114.4(3)(a), C.R.S.

1. Specific Non-Applicable Requirements

Based upon the information available to the Division and supplied by the applicant, the following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued. This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance.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
None	None	None

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 conditions have been streamlined.

SECTION IV - General Permit Conditions

1. Administrative Changes

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

The permittee shall submit an application for an administrative permit amendment to the Division for those permit changes that are described in Regulation No. 3, Part A, § I.B.1. The permittee may immediately make the change upon submission of the application to the Division.

2. Certification Requirements

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

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

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

c. Compliance certifications shall contain:

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

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

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

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

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

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

3. Common Provisions

Common Provisions Regulation, 5 CCR 1001-2 §§ II.A., II.B., II.C., II,.E., II.F., II.I, and II.J

a. To Control Emissions Leaving Colorado

When emissions generated from sources in Colorado cross the State boundary line, such emissions shall not cause the air quality standards of the receiving State to be exceeded, provided reciprocal action is taken by the receiving State.

b. Emission Monitoring Requirements

The Division may require owners or operators of stationary air pollution sources to install, maintain, and use instrumentation to monitor and record emission data as a basis for periodic reports to the Division.

c. Performance Testing

The owner or operator of any air pollution source shall, upon request of the Division, conduct performance test(s) and furnish the Division a written report of the results of such test(s) in order to determine compliance with applicable emission control regulations. Performance test(s) shall be conducted and the data reduced in accordance with the applicable reference test methods unless the Division:

(i) specifies or approves, in specific cases, the use of a test method with minor changes in methodology;

(ii) approves the use of an equivalent method;

(iii) approves the use of an alternative method the results of which the Division has determined to be adequate for indicating where a specific source is in compliance; or

(iv) waives the requirement for performance test(s) because the owner or operator of a source has demonstrated by other means to the Division's satisfaction that the affected facility is in compliance with the standard. Nothing in this paragraph shall be construed to abrogate the Commission's or Division's authority to require testing under the Colorado Revised Statutes, Title 25, Article 7 1973, and pursuant to regulations promulgated by the Commission.

Compliance test(s) shall be conducted under such conditions as the Division shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Division such records as may be necessary to determine the conditions of the performance test(s). Operations during period of startup, shutdown, and malfunction shall not constitute representative conditions of performance test(s) unless otherwise specified in the applicable standard.

The owner or operator of an affected facility shall provide the Division thirty days prior notice of the performance test to afford the Division the opportunity to have an observer present. The Division may waive the thirty day notice requirement provided that arrangements satisfactory to the Division are made for earlier testing.

The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:

(i) Sampling ports adequate for test methods applicable to such facility,

(ii) Safe sampling platform(s),

(iii) Safe access to sampling platform(s).

(iv) Utilities for sampling and testing equipment.

Each performance test shall consist of at least three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard the arithmetic mean of results of at least three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Division's approval, be determined using the arithmetic mean of the results of the two other runs.

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

d. Upset Conditions and Breakdowns

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

e. Circumvention Clause

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

f. Compliance Certifications

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

g. Affirmative Defense Provision for Excess Emissions During Startup and Shutdown

An affirmative defense is provided to owners and operators for civil penalty actions for excess emissions during periods of startup and shutdown. To establish the affirmative defense and to be relieved of a civil penalty in any action to enforce an applicable requirement, the owner or operator of the facility must meet the notification requirements below in a timely manner and prove by a preponderance of the evidence that:

(i) The periods of excess emissions that occurred during startup and shutdown were short and infrequent and could not have been prevented through careful planning and design;

(ii) The excess emissions were not part of a recurring pattern indicative of inadequate design, operation or maintenance;

(iii) If the excess emissions were caused by a bypass (an intentional diversion of control equipment), then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(iv) The frequency and duration of operation in startup and shutdown periods were minimized to the maximum extent practicable;

(v) All possible steps were taken to minimize the impact of excess emissions on ambient air quality;

(vi) All emissions monitoring systems were kept in operation (if at all possible);

(vii) The owner or operator’s actions during the period of excess emissions were documented by properly signed, contemporaneous operating logs or other relevant evidence; and,

(viii) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions. This subparagraph is intended solely to be a factor in determining whether an affirmative defense is available to an owner or operator, and shall not constitute an additional applicable requirement.

The owner or operator of the facility experiencing excess emissions during startup and shutdown shall notify the Division verbally as soon as possible, but no later than two (2) hours after the start of the next working day, and shall submit written quarterly notification following the initial occurrence of the excess emissions. The notification shall address the criteria set forth above.

The Affirmative Defense Provision contained in this section shall not be available to claims for injunctive relief.

The Affirmative Defense Provision does not apply to State Implementation Plan provisions or other requirements that derive from new source performance standards (NSPS) or national emissions standards for hazardous air pollutants (NESHAPS), any other federally enforceable performance standard or emission limit with an averaging time greater than twenty-four hours. In addition, an affirmative defense cannot be used by a single source or small group of sources where the excess emissions have the potential to cause an exceedance of the ambient air quality standards or Prevention of Significant Deterioration (PSD) increments.

In making any determination whether a source established an affirmative defense, the Division shall consider the information within the notification required above and any other information the Division deems necessary, which may include, but is not limited to, physical inspection of the facility and review of documentation pertaining to the maintenance and operation of process and air pollution control equipment

4. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

5. Emergency Provisions

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

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

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

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

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

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

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

6. Emission Standards for Asbestos

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

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

7. Emissions Trading, Marketable Permits, Economic Incentives

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

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

8. Fee Payment

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

a. The permittee shall pay an annual emissions fee in accordance with the provisions of C.R.S. § 25-7-114.7. A 1% per month late payment fee shall be assessed against any invoice amounts not paid in full on the 91st day after the date of invoice, unless a permittee has filed a timely protest to the invoice amount.

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

c. The permittee shall pay an APEN fee in accordance with the provisions of C.R.S. § 25-7-114.1(6) for each APEN or revised APEN filed.

9. Fugitive Particulate Emissions

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

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

10. Inspection and Entry

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

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

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

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

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

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

11. Minor Permit Modifications

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

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

12. New Source Review

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

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

13. No Property Rights Conveyed

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

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

14. Odor

Regulation No. 2, 5 CCR 1001-4, Part A

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

15. Off-Permit Changes to the Source

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

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

16. Opacity

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

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

17. Open Burning

Regulation No. 9, 5 CCR 1001-11

The permittee shall obtain a permit from the Division for any regulated open burning activities in accordance with provisions of Regulation No. 9.

18. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

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

19. Permit Expiration and Renewal

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

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

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

20. Portable Sources

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

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

21. Prompt Deviation Reporting

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

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

"Prompt" is defined as follows:

a. Any definition of "prompt" or a specific timeframe for reporting deviations provided in an underlying applicable requirement as identified in this permit; or

b. Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

   i. For emissions of a hazardous air pollutant or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report shall be made within 24 hours of the occurrence;

   ii. For emissions of any regulated air pollutant, excluding a hazardous air pollutant or a toxic air pollutant that continue for more than two hours in excess of permit requirements, the report shall be made within 48 hours; and

   iii. For all other deviations from permit requirements, the report shall be submitted every six (6) months, except as otherwise specified by the Division in the permit in accordance with paragraph 22.d. below.

c. If any of the conditions in paragraphs b.i or b.ii above are met, the source shall notify the Division by telephone (303-692-3155) or facsimile (303-782-0278) based on the timetables listed above. *[Explanatory note: Notification by telephone or facsimile must specify that this notification is a deviation report for an Operating Permit.]* A written notice, certified consistent with General Condition 2.a. above (Certification Requirements), shall be submitted within 10 working days of the occurrence. All deviations reported under this section shall also be identified in the 6-month report required above.

"Prompt reporting" does not constitute an exception to the requirements of "Emergency Provisions" for the purpose of avoiding enforcement actions.

22. Record Keeping and Reporting Requirements

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

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

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

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

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

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

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

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

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

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

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

23. Reopenings for Cause

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

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

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

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

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

24. Section 502(b)(10) Changes

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

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

25. Severability Clause

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

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

26. Significant Permit Modifications

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

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

27. Special Provisions Concerning the Acid Rain Program

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

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

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

28. Transfer or Assignment of Ownership

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

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

29. Volatile Organic Compounds

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

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

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

   Except when otherwise provided by Regulation No. 7, all volatile organic compounds, excluding petroleum liquids, transferred to any tank, container, or vehicle compartment with a capacity exceeding 212 liters (56 gallons), shall be transferred using submerged or bottom filling equipment. For top loading, the fill tube shall reach within six inches of the bottom of the tank compartment. For bottom-fill operations, the inlet shall be flush with the tank bottom.

b. The permittee shall not dispose of volatile organic compounds by evaporation or spillage unless Reasonably Available Control Technology (RACT) is utilized.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

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

OPERATING PERMIT APPENDICES

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

*DISCLAIMER:

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

APPENDIX A - Inspection Information

Directions to Plant:

The plant is located 4 miles west of Watkins, 0.5 miles north of the intersection of I-70 and Powhaton Road.

Safety Equipment Required:

Eye protection
Hard hat
Safety shoes
Hearing protection
Fire Resistant Clothing

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on December 8, 1995 with the source's Title V Operating Permit Application.

List of Insignificant Activities:

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

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

Product storage tanks
Dehydrator heater
Clark Detroit Diesel fire water and facility wash down pump engine (less than 400 hours per year of operation)
TEG dehydrator heater

APPENDIX B
Reporting Requirements and Definitions

with codes ver 6/1/06

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

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

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

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

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

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

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

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

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

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

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

any term or condition of the permit are required to be summarized or referenced in the annual compliance certification.

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

For purposes of this operating permit, the Division is requiring that the permit deviation reports are.due as set forth in General Condition 21. Where the underlying applicable requirement contains a definition of prompt or otherwise specifies a time frame for reporting deviations, that definition or time frame shall govern. For example, quarterly Excess Emission Reports required by an NSPS or Regulation No. 1, Section IV.

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

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

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

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

(4) A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only if the emission point is subject to CAM)

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

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

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

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

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

- The identification of each term or condition of the permit that is the basis of the certification;
- Whether or not the method(s) used by the owner or operator for determining the compliance status with each permit term and condition during the certification period was the method(s) specified in the permit. Such methods and other means shall include, at a minimum, the methods and means required in the permit. If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Federal Clean Air Act, which prohibits knowingly making a false certification or omitting material information;
- The status of compliance with the terms and conditions of the permit, and whether compliance was continuous or intermittent. The certification shall identify each deviation and take it into account in the compliance certification. Note that not all deviations are considered violations.[1]
- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

The Certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred. (only for emission points subject to CAM)

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

[1] For example, given the various emissions limitations and monitoring requirements to which a source may be subject, a deviation from one requirement may not be a deviation under another requirement which recognizes an exception and/or special circumstances relating to that same event. Further, periods of excess emissions during startup, shutdown and malfunction may not be found to be a violation of an emission limitation or standard where the source adequately shows that any potential deviations as a result of these infrequent periods were minimized to the extent practicable and could not have been prevented through careful planning, design, or were unavoidable to prevent loss of life, personal injury, or severe property damage.

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

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

Startup, Shutdown, and Malfunctions

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

Emergencies and Upsets

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

DEFINITIONS

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

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

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

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

APPENDIX B: Monitoring and Permit Deviation Report - Part I

1. Following is the **required** format for the Monitoring and Permit Deviation report to be submitted to the Division as set forth in General Condition 21. The Table below must be completed for all equipment or processes for which specific Operating Permit terms exist.

2. Part II of this Appendix B shows the format and information the Division will require for describing periods of monitoring and permit deviations, or upset or emergency conditions as indicated in the Table below. One Part II Form must be completed for each Deviation. Previously submitted reports (e.g. EER's or Upsets) may be referenced and the form need not be filled out in its entirety.

FACILITY NAME: BP America Production Company - Wattenberg Gas Plant
OPERATING PERMIT NO: 95OPAD102
REPORTING PERIOD:_____(see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
P001	Hot Oil Heater, Natural Gas Fired, Rated at 22.4 MMBtu/hr, Serial Number 73066					
P002	Broach Natural Gas Fired Regeneration Heater, Rated at 15.0 MMBtu/hr, Serial Number 75708					
P004	Eclipse Natural Gas Fired Series PR Steam Boiler, Rated at 16.8 MMBtu/hr, Serial Number 1252					
P005 P006	Solar Model Saturn 10-1400 Natural Gas Fired Cogeneration Turbine, Rated at 14.5 MMBtu/hr, Serial Number 22879, with a Natural Gas Fired Duct Burner, Rated at 10.0 MMBtu/hr, Serial Number Not Provided					
P010	Waukesha Model 12V-AT25-GL Natural Gas Fired Internal Combustion Engine, Low NOx Design, Rated at 2,350 HP, Serial Number 10797-1					
P011	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 20834					
P012	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 265949					

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
P013	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20843					
P014	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20842					
P015	Uniflux Natural Gas Fired Regeneration Heater, Rated at 12.0 MMBtu/hr, Serial Number 40140201					
F019	Propane Loadout Facility					
F020	Natural Gas Liquids/Inlet Gas Condition System Fugitive VOC Emissions					
P021	John Zink Model 801A Natural Gas Fired Thermal Oxidation Unit, Rated at 7.0 MMBtu/hr, Serial Number A02762-B-203-1					
F025	Railcar Loading Station					
F026	Pressurized Hydrocarbon Storage Vessels					
F027	Slug Liquid Processing Unit Fugitive VOC Emissions					
F028	Facility Fugitive VOC Emissions					
P029	Facility Flare					
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 = CAM: A situation in which an excursion or exceedance as defined in 40CFR Part 64 (the Compliance Assurance Monitoring (CAM) Rule) has occurred.

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

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: BP America Production Company - Wattenberg Gas Plant
OPERATING PERMIT NO: 95OPAD102
REPORTING PERIOD:

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

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

Normal Operation _____

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Upsets/Emergencies Reported (if applicable)

Deviation Code _____ Division Code QA: _____ _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

FACILITY NAME: Acme Corp.
OPERATING PERMIT NO: 96OPZZXXX
REPORTING PERIOD: 1/1/04 - 6/30/04

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)

5/30/04 to A. Einstein, APCD

Deviation Code _____ Division Code QA: _____
_____

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: BP America Production Company - Wattenberg Gas Plant

FACILITY IDENTIFICATION NUMBER: 0010025

PERMIT NUMBER: 95OPAD102

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 as defined in Colorado Regulation No. 3, Part A, Section I.B.38. 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: BP America Production Company - Wattenberg Gas Plant

OPERATING PERMIT NO: 95OPAD102

REPORTING PERIOD:

I. Facility Status

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

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

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
P001	Hot Oil Heater, Natural Gas Fired, Rated at 22.4 MMBtu/hr, Serial Number 73066						
P002	Broach Natural Gas Fired Regeneration Heater, Rated at 15.0 MMBtu/hr, Serial Number 75708						
P004	Eclipse Natural Gas Fired Series PR Steam Boiler, Rated at 16.8 MMBtu/hr, Serial Number 1252						
P005 P006	Solar Model Saturn 10-1400 Natural Gas Fired						

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
	Cogeneration Turbine, Rated at 14.5 MMBtu/hr, Serial Number 22879, with a Natural Gas Fired Duct Burner, Rated at 10.0 MMBtu/hr, Serial Number Not Provided						
P010	Waukesha Model 12V-AT25-GL Natural Gas Fired Internal Combustion Engine, Low NOx Design, Rated at 2,350 HP, Serial Number 10797-1						
P011	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 20834						
P012	Superior Model 16GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 2,225 HP, Serial Number 265949						
P013	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20843						
P014	Superior Model 8GTL-825 Natural Gas Fired Internal Combustion Engine, Lean Burn, Rated at 1,100 HP, Serial Number 20842						
P015	Uniflux Natural Gas Fired Regeneration Heater, Rated at 12.0 MMBtu/hr, Serial Number 40140201						
F019	Propane Loadout Facility						
F020	Natural Gas Liquids/Inlet Gas Condition System						

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]	
		Previous	Current	YES	NO	Continuous	Intermittent
	Fugitive VOC Emissions						
P021	John Zink Model 801A Natural Gas Fired Thermal Oxidation Unit, Rated at 7.0 MMBtu/hr, Serial Number A02762-B-203-1						
F025	Railcar Loading Station						
F026	Pressurized Hydrocarbon Storage Vessels						
F027	Slug Liquid Processing Unit Fugitive VOC Emissions						
F028	Facility Fugitive VOC Emissions						
P029	Facility Flare						
General Conditions							
Insignificant Activities [4]							

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

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

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

NOTE:

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

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

II. Status for Accidental Release Prevention Program:

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

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

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

III. Certification

All information for the Annual Compliance Certification must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section I.B.38. This signed certification document must be packaged with the documents being submitted.

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 300
Denver, CO 80202

Permit Modifications, Off Permit Changes:

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

APPENDIX E
Permit Acronyms

Listed Alphabetically:

AIRS -	Aerometric Information Retrieval System
AP-42-	EPA Document Compiling Air Pollutant Emission Factors
APEN -	Air Pollution Emission Notice (State of Colorado)
APCD -	Air Pollution Control Division (State of Colorado)
ASTM -	American Society for Testing and Materials
BACT -	Best Available Control Technology
BTU -	British Thermal Unit
CAA -	Clean Air Act (CAAA = Clean Air Act Amendments)
CCR -	Colorado Code of Regulations
CEM -	Continuous Emissions Monitor
CF -	Cubic Feet (SCF = Standard Cubic Feet)
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
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
PM10 -	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
SO2 -	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
October 6, 2004	Minor	Info Page	Revised facility contact person
		Section II	Revised RTO (P021) SO2 annual emission limit from 2.1 to 15.0 tpy
August 23, 2006	Minor	Info Page	Revised responsible official
		Section I Emission Unit Summary	Revised P011, P012, P013 and P014 from rich burn to lean burn engines
			Revised P012, P013 and P014 engines to include pollution control equipment
			Revised P005, turbine serial number
			Combined F018, F022, F023, and F024 fugitive emission points into F028, Facility Fugitive Emission point
			Added P029, Facility Flare emission point
		Section II	Revised P012, P013 and P014 engine monitoring requirements
			Combined F018, F022, F023, and F024 into F028, Facility Fugitive Emission point
			Added P029, Facility Flare emission point
		Appendix A	Revised Diesel Water Pump insignificant activity description
		Appendix B & C	Revised to incorporate latest version
March 1, 2007	Minor	Info Page	Revised responsible official
		Section I	Revised PSD citations
		Section II	Revised opacity and natural gas language
		Section II, 13.9	Revised TOU/flare routing language to delete consideration as an upset
		Appendix B & C	Revised to incorporate latest version
April 13, 2007	Administrative	Section II	Revised CO and VOC emission factors to be consistent with the annual emission limits for P012, P013 and P014