Colorado Department of Public Health and Environment

OPERATING PERMIT

PLATTE RIVER POWER AUTHORITY - RAWHIDE ENERGY STATION

First Issued June 1, 2001
Proposed Renewal Permit
Renewed: January 1, 2007

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	**Rawhide Energy Station**	OPERATING PERMIT NUMBER
FACILITY ID:	**0690053**	**96OPLR142**

RENEWED: January 1, 2007
EXPIRATION DATE: January 1, 2012
MODIFICATIONS: See Appendix F of Permit

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

ISSUED TO:

Platte River Power Authority
2000 East Horsetooth Road
Fort Collins, CO 80525

PLANT SITE LOCATION:

2700 East County Road 82
Wellington, CO 80549-2105
Larimer County

INFORMATION RELIED UPON
Operating Permit Renewal Application Received: May 20, 2005
And Additional Information Received: July 5, 2005

Nature of Business: Generation of Electricity
Primary SIC: 4911

RESPONSIBLE OFFICIAL
Name: Jason Frisbie
Title: Division Manager
Power Production
Phone: (970) 229-1705

FACILITY CONTACT PERSON
Name: Mike O'Brien
Title: Environmental Specialist
Phone: (970) 229-5648

SUBMITTAL DEADLINES:
Semi-Annual Monitoring Period: July – December, January - June
Semi-Annual Monitoring Report: August 1, 2007 & February 1, 2008 and subsequent years
Annual Compliance Period: Begins January 1 to December 31
Annual Compliance Certification: February 1, 2008 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.

FOR ACID RAIN SUBMITTAL DEADLINES SEE SECTION III.4 OF THIS PERMIT.

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SECTION I - General Activities and Summary

Note To Reader: Appendix E presents the acronyms and abbreviations used in preparing this permit.

1. Permitted Activities

1.1 This facility consists of one pulverized coal fired steam driven electrical generating unit. The unit is a tangentially fired boiler, with a nominal generating capacity of 305 MW (gross). The boiler is rated at 3000 mmBTU/hour (based on maximum coal consumption and average coal BTU content), and was placed in service on April 1, 1984. A Spray Dry Absorber controls SO_2 and two baghouses control PM emissions. The boiler is equipped with separated over-fire-air registers for primary control of NO_x emissions, and a concentric firing burner configuration that provides for minimization of NO_x emissions. Continuous emissions monitoring equipment is in place for SO_2, NO_x, CO_2, stack flow rate, and opacity (COM). The unit is subject to the requirements of Title IV, the Acid Rain Program and was approved for the Early Election for NO_x limits, effective January 1, 1997. Associated activities covered by this permit include coal, ash, and lime handling systems, and industrial unpaved site roads and parking lot activities.

The facility is located at 2700 East County Road 82, approximately 10 miles north of Wellington. The area in which the plant operates is designated as attainment for all pollutants.

Wyoming is an affected state within 50 miles of the plant. There are two Federal Class I designated areas within 100 kilometers of the facility: Rocky Mountain National Park, and Rawah National Wilderness Area.

1.2 Until such time as this permit expires, is modified or is 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. The underlying construction permits may be revised, however, by using the permit modification procedures in accordance with Regulation 3 of the Colorado Air Pollution Control Regulations and incorporating the new applicable requirements into the operating permit. This permit incorporates the applicable requirements from the following construction permits: 12LR525(1-5, 7-12, 14, 16-18), the PSD Permit issued by the EPA, and the Voluntary Emissions Reduction Agreement.

1.4 All conditions in this permit are enforceable by the US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:** Condition 1.3.2 (SO_2 emission limit, Colorado Regulation No. 1, VI.B.a(iv)), Conditions 1.9 (Lead standard) and 1.12 (Opacity) of Section II.1, Condition 14 of

Section II (Voluntary Emissions Reduction Agreement), and Condition 14 (Odor) and those portions of Colorado Regulation No. 15, as identified in Condition 18 (Ozone Depleting Compounds) of Section V of this permit. 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 V of this permit, except that the permittee shall submit monitoring reports to the Division on a quarterly basis.

1.5 The following Operating Permit is associated with this facility for purposes of determining applicability of New Source Review regulations: 03OPLR261.

2. Prevention of Significant Deterioration

2.1 This facility is categorized as a major stationary source (Potential to Emit > 100 tons/year). Future modifications at this facility resulting in a significant net emissions increase (see Colorado Regulation No. 3, Part D, Sections II.A.27 and 44) for any pollutant as listed in Regulation No. 3, Part D, Section II.A.44 or a modification which is major byitself may result in the application of the Prevention of Significant Deterioration requirements.

3. Accidental Release Program (112(r))

3.1 Based on the information provided by the applicant, this facility is not subject to the provisions of the Accidental Release Prevention Program (Section 112(r) of the Federal Clean Air Act).

4. Summary of Emission Units

4.1 The emission units regulated by this permit are the following:

Emission Unit Number	AIRS Stack Number	Facility Stack Number	Description	Pollution Control Device	Existing Permit
B001	001	S101	Combustion Engineering #1930618 tangentially fired, 3,000 mmBTU/hour, dry bottom steam generator/boiler firing pulverized coal.	SO_2 Scrubber OFA w/ CFS Baghouse	12LR525(1)
P201	002	S201S202	Train Unloading Facility - Subsystem #1 and Subsystem #2	Baghouse	12LR525(2)
P201	003	S203	Active Coal Pile Reclaim	Baghouse	12LR525(3)
P201	004	S204	Coal Silo Filling and Conveyor Belt Transfer	Baghouse	12LR525(4)
P201	005	S205	Coal Silo Discharge to Conveyor Belt	Baghouse	12LR525(5)
P201	006	S206	Coal Crushing and Conveying	Baghouse	12LR525(7)
P201	007	S207	Coal Conveyor Belt Transfer	Baghouse	12LR525(8)
P201	008	S208	In-Plant Silo Filling Conveyor Belt Transfer	Baghouse	12LR525(9)

Emission Unit Number	AIRS Stack Number	Facility Stack Number	Description	Pollution Control Device	Existing Permit
P201	009	S209	Coal Pile Stockout	Telescopic chute	12LR525(10)
P201	010	S212	Active Coal Storage Area	Fugitive Dust Control Plan	12LR525(11)F
P201	011	S213	Inactive Coal Pile Storage Area	Fugitive Dust Control Plan	12LR525(14)F
P201	012	S210	Coal Crusher Stockout	Telescopic Chute	12LR525(18)
P201	029	S211	Coal Conveying	Enclosed	None*
P301	014	S303	Solid Wastes Silo Rotary Unloader Discharge	Water Spray	12LR525(17)
P301	015/020	S308	Solid Wastes Hauling to Landfill	Fugitive Dust Control Plan	12LR525(16)F
P301	016/021	S305	Solid Wastes Haul Truck Unloading	Fugitive Dust Control Plan	12LR525(16)F
P301	017	S309	Active/Exposed Landfill Area	Fugitive Dust Control Plan	12LR525(16)F
P301	018	S307	Waste Landfilling/Reclamation	Fugitive Dust Control Plan	12LR525(16)F
P301	019	S306	Bottom Ash Excavation and Loading	Fugitive Dust Control Plan	12LR525(16)F
P301	022	S301	Solid Wastes Silo Filling	Baghouse	12LR525(17)
P301	030	S302	Solids Vacuum Conveying System and Silo Filling	Baghouse	None*
P301	031	S304	Fly Ash and Solid Waste Silo Dry Unloading and Haul Truck Loading	Telescopic Chute	None*
P401	013	S401	Scrubber Lime Storage Silo Filling	Baghouse	12LR525(12)
P401	032	S402	Recycle Ash Storage Silo Filling	Baghouse	None*
P501	033	S501	Unpaved Site Roadways and Parking Lots	Fugitive Dust Control Plan	None*
P501	034	S502	PRS Soda Ash Storage Silo Filling	Baghouse	None*
P502	027		Cooling System with Pond		Exempt

*These are existing sources which were not previously issued a Construction Permit. Applicable requirements were directly incorporated into this Operating Permit.

4.2 Alternate Operating Scenarios

No alternate operating scenarios were requested for this facility.

5. Compliance Assurance Monitoring (CAM)

The following emission points at this facility use a control device to achieve compliance with an emission limitation or standard to which they are subject and have pre-control emissions that exceed or are equivalent to the major source threshold. They are therefore subject to the provisions of the CAM program as set forth in 40 CFR Part 64 as adopted by reference into Colorado Regulation No. 3, Part C, Section XIV:

S101 – Boiler
S402 – Recycle Ash Storage Silo Filling

SECTION II - Specific Permit Terms

1. S101- 3,000 mmBtu/Hr Combustion Engineering Boiler

Coal Fired

Parameter	Permit Condition Number	Limitations	Emission Factors[1]	Monitoring	
				Method	Interval
Particulate Matter (PM)	1.1.1 1.1.2	0.03 lb/mmBtu 0.03 lb/mmBtu		Baghouse Maintenance and Source Testing Broken Bag Detectors Opacity	See Conditions 1.1 and 15
Particulate Matter (PM and PM_{10}) Emission Calculations	1.2		From Source Testing Required By Condition 1.1	Calculation and Recordkeeping	Annually
SO_2	1.3.1 1.3.2 1.3.3	.19 lb/mmBTU, 3 hr avg 0.4 lb/mmBtu – 3 hr avg .13 lb/mmBTU, 30 operating days and 80% reduction		Continuous Emission Monitor	Continuous
NO_x	1.4	0.5 lb/mmBTU, 30 day avg		Continuous Emission Monitor	Continuous
	Section III, 2	Acid Rain Program Emission Limit: 0.45 lb/mmBtu, annual average			
Emission Calculations for APEN Reporting	1.5		<u>In lbs/ton</u> CO -0.50 (or CEM data) VOC - 0.06 H_2SO_4 - 0.43 S[1] <u>CEM data</u> NO_x SO_2	Recordkeeping and APEN Calculations	Annually
Fuel Use	1.6	1.5×10^6 tons/year		Recordkeeping	Monthly
Fuel Sampling	1.7			ASTM Methods	Quarterly
Continuous Emission Monitoring Requirements	1.8			See Condition 1.8	
Lead (Pb) -	1.9	1.5 micrograms per	4.2×10^{-4} lb/ton coal	Recordkeeping and	See Condition

State Only(Ambient Standard)		standard cubic meter averaged over a one-month period	burned	Calculation	1.9
Opacity	1.10	Not to exceed 20%, except as provided for in 1.11, below		Continuous Opacity Monitor	Continuous, Six Minute Intervals
	1.11	For certain operational activities, not to exceed 30%, for a period or periods aggregating more than six (6) minutes in any 60 consecutive minutes		Continuous Opacity Monitor	Continuous, Six Minute Intervals
	1.12 (NSPS and PSD)	Not to exceed 20%, except for one 6-minute period not more than 27% per hour			
Acid Rain	1.14	See Section III of this Permit		Certification	Quarterly Annually
Excess Emission Reports for PSD Permit Limits	1.15	Notify by noon of the next working day and provide written information within one month			

[1]S = weight percent sulfur in fuel

Note: See Voluntary Emissions Reduction Agreement Limits, Section II, Condition 14 of this permit.

1.1 Particulate Emissions:

Particulate Matter (PM) emissions shall not exceed the following limitations.

1.1.1 0.03 lb/mmBtu heat input (PSD Permit). See Condition 1.14.

1.1.2 0.03 lb/mmBtu (Construction Permit 12LR525(1) and 40 CFR Part 60, Subpart Da, as adopted by reference in Colorado Regulation No. 6, Part A).

This limit applies at all times except during periods of startup, shutdown, or malfunction. (60.46a(c)). The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the affected facility; or any malfunction of the air pollution control equipment.(60.7(b))

At all times, including periods of startup, shutdown, or malfunction, this source is subject to the good air pollution control practices set forth in Condition 8. of this permit. (60.11(d))

Compliance with these limits shall be demonstrated as follows.

Baghouse Operation and Maintenance Requirements

Routine maintenance of and operational procedures performed on the baghouse shall be conducted in accordance with manufacturer's specifications and good engineering practices. These procedures shall be in written format. Any maintenance work performed shall be documented and made available to the Division upon request.

The baghouse shall be periodically inspected for bag integrity and overall mechanical integrity. At a minimum, these checks will be performed whenever the unit is down for a Planned Maintenance Outage (PMO). Repairs performed (other than minor adjustments) as a result of these inspections shall be documented and made available to the Division upon request.

Stack Testing

Performance testing for particulate emissions shall be performed annually, in accordance with the requirements and procedures set forth in EPA Test Method 5 as set forth in 40 CFR Part 60, Appendix A. A stack 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 stack 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 stack 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

Compliance Assurance Monitoring

This emission limit is subject to the CAM requirements as set forth in Section II, Condition 15 of this permit.

1.2 Annual Particulate Emissions:

Annual emissions of PM and PM_{10} for the purposes of APEN reporting and payment of annual fees will be determined using the emission factor for PM determined from the source testing required in Condition 1.1.2 and the annual fuel usage, as required by Condition 1.6. in the following equation:

$$\text{PM:} \quad \text{Tons/yr} = \frac{[\text{EF (lbs/mmBtu) x fuel usage (tons/yr) x heat content of fuel (mmBtu/ton)}]}{2000 \text{ lbs/ton}}$$

PM_{10}: Tons/yr = 0.92 x (Annual Emissions of PM)

The heat content of the fuel shall be the average heat content of the fuel as determined by fuel sampling required in Condition 1.7.

1.3 <u>SO_2 Emissions:</u>

SO_2 emissions shall not exceed the following standards. Compliance with these standards shall be demonstrated using the continuous emission monitor (CEM) required by Condition 1.8. of this permit.

1.3.1 0.19 lb/mmBTU heat input determined on a 3 hour rolling average basis. This limit is based on 70% reduction of the potential combustion concentration. (Construction Permit 12LR525(1)).

This SO_2 emission limit applies at all times except during periods of start-up, shutdown, or when both emergency conditions (as defined in Subpart Da) exist. Those instances during startup, shutdown and emergency conditions when the SO_2 limit set forth in this Condition 1.3.1 is exceeded shall be identified in the Excess Emission Report required in condition 9.5.

At all times, including startup, shutdown and malfunction, the source shall, to the extent practicable, operate and maintain this unit in a manner consistent with good air pollution control practices as identified in Condition 8.0 (40 CFR part 60.11(d) as adopted by reference in Colorado Regulation No. 6, Part A).

1.3.2 New sources of sulfur dioxide shall not emit or cause to be emitted sulfur dioxide in excess of the following process-specific limitations (Heat input rates shall be the manufacturer's guaranteed maximum heat input rates.)

All Coal-fired Operations, Including Coal-Fired Steam Generators

Units with a coal heat input of 250 million BTU per hour or greater: 0.4 lb SO_2/million BTU coal heat input.

(Colorado Regulation No. 1, VI.B.4.a(iii) Note: This standard is federally enforceable and applies at all times.)

The averaging time for all new source emissions standards for sulfur dioxide shall be three (3) hours, and any three-hour rolling average of emission rates which exceeds these standards is a violation of this regulation. (Colorado Regulation No. 1, VI.B.2)

1.3.3 0.13 lb/mmBTU heat input, as averaged over 30 successive boiler operating days, and 80% reduction of the potential combustion concentration (PSD permit). See Condition 1.14.

Boiler operating day means a 24-hour period during which fossil fuel is combusted in a steam generating unit for the entire 24 hours.

1.4 NO_X Emissions:

NO_X emissions shall not exceed 0.5 lbs/mmBtu, as averaged over 30 successive boiler operating days. (PSD Permit) See Condition 1.14. Compliance with this standard shall be demonstrated using the continuous emission monitor (CEM) required by Condition 1.8. of this permit.
At all times, including startup, shutdown and malfunction, the source shall, to the extent practicable, operate and maintain this unit in a manner consistent with good air pollution control practices as identified in Condition 8.0 (40 CFR part 60.11(d) as adopted by reference in Colorado Regulation No. 6, Part A).

1.5 Emission Factors and APEN Reporting:

The APEN emission factors and methods listed in the table above have been approved by the Division and may be used to calculate emissions from the boiler. Other appropriate emission factors (i.e., EPA's Compilation of Emission Factors (AP-42), dated September 1998, Section 1.1) and appropriate control equipment collection efficiencies may also be used as noted in Section II, Condition 13 or this permit. CO emissions may be estimated using the emission factor, or the existing uncertified CO monitor. Annual emissions for the purposes of APEN reporting and the payment of annual fees shall be calculated using the appropriate emission factors and the annual fuel usage, as required by Condition 1.6, in the following equation:

$$\text{Tons/yr} = \frac{[\text{EF (lbs/ton) x annual fuel usage (tons/yr)}]}{2000 \text{ lbs/ton}}$$

For APEN and fee purposes, annual emissions of SO_2 and NO_X shall be determined from the Continuous Emission Monitors (CEMs) required by Condition 1.8.

1.6 Coal Consumption:

Annual coal consumption shall not exceed 1.5 x 10^6 tons per year (Construction Permit 12LR525(1)). Compliance with the annual limit shall be determined on a rolling 12 month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data. Monthly records of the actual consumption shall be maintained by the applicant and made available for inspection upon request. Either belt scale or coal feeder data shall be used to determine and show compliance with the annual coal consumption limit.

1.7 Coal Sampling and Analysis:

Coal shall be sampled quarterly to determine the heat content, weight percent sulfur, weight percent ash, and moisture content. Prior to the first coal sampling event, a coal sampling plan shall be submitted to the Division for approval. The coal sampling plan shall at a minimum include the elements identified in Appendix G. The sulfur, ash and heat content of the coal shall be determined by sampling and testing the coal in accordance with the Division approved coal sampling plan. Alternatively, vendor receipts, invoices, contracts, or other information may be used to provide the values for sulfur, ash and heat content. Such alternative information shall indicate that coal sampling and analyses have been performed in accordance with the ASTM procedures, or equivalent, identified in Appendix G.

1.8 CEM and COM Monitoring Systems:

For this unit, the source shall install, certify and operate continuous emission monitoring (CEM) equipment for measuring opacity, SO_2, NO_X (including diluent gas: either CO_2 or O_2), CO_2, and volumetric flow (40 CFR Part 60 as adopted by reference in Colorado Regulation No. 6, Part A, and Part 75 as adopted by reference in Colorado Regulation No. 18 and Colorado Regulation No. 1, Section IV.B.1, 2 and 3). In addition, the permittee shall install, certify, and operate a CEM for the SDA scrubber inlet SO_2 concentration and CO_2, as required in 40 CFR, Part 60, Subpart Da. The CEM systems shall meet the requirements in Condition 9.0 and Section III of this permit.

1.9 Lead Emissions:

Emissions of Lead (Pb) shall not be such that emissions result in an ambient lead concentration exceeding 1.5 micrograms per standard cubic meter averaged over a one-month period (Colorado Regulation No. 8, Part C, Section I.B). The permittee has submitted modeling results which indicate compliance with this applicable requirement. A copy of the modeling analysis and results shall be maintained and made available for inspection upon request.

Annual emissions of lead shall be calculated for the purposes of APEN reporting and payment of annual fees using the emission factor identified in the table in the following equation:

$$\text{Tons/yr} = \frac{[\text{EF(lbs/ton)} \times \text{annual fuel use (tons/yr)}]}{2{,}000 \text{ lbs/ton}}$$

The actual fuel use as recorded as required in Condition 1.6, for the year shall be used in this equation.

1.10 Opacity – Regulation No. 1, II.A.1

Except as provided in Condition 1.11, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which the Regulation No. 1 standards are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July, 1992)), unless otherwise specified in this permit. (Colorado Regulation No. 1, II.A.1).

The permittee shall operate, calibrate and maintain a continuous in-stack monitoring device for the measurement of opacity. Unless otherwise specified in this permit, the continuous opacity monitor (COM) shall be used to monitor compliance with the 20% opacity limit set forth above. The requirements for the opacity monitoring system are defined in Condition 9 of this permit.

Compliance with this standard shall be demonstrated using the attached Periodic Monitoring Plan (Appendix I).

1.11 Opacity – Regulation No. 1, II.A.4

No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, 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.4).

The permittee shall operate, calibrate and maintain a continuous in-stack monitoring device for the measurement of opacity. Unless otherwise specified in this permit, the continuous opacity monitor (COM) shall be used to monitor compliance with the 30% opacity limit set forth above. The requirements for the opacity monitoring system are defined in Condition 9 of this permit.

Compliance with this standard shall be demonstrated using the attached Periodic Monitoring Plan (Appendix I).

A record shall be kept of the type, date and time of the commencement and completion of each and every condition subject to Colorado Regulation No. 1, II.A.4 that results in an exceedance. The records shall be made available for review upon request by the Division.

1.12 <u>NSPS and PSD Permit Opacity Requirements:</u>

Opacity shall not exceed 20 percent, as averaged over each separate 6 minute period, except for one 6 minute period per hour of not more than 27 percent opacity. Compliance with this limit shall be as provided for in 40 CFR Part 60, Appendix A, EPA Reference Method 9, and data from the COM required by Condition 9.4.1 of this permit (PSD Permit and 40 CFR Part 60, Subpart Da).

This opacity standard applies at all times except during periods of startup, shutdown, or malfunction. The permittee shall use good operating practices as set forth in Condition 8.0 of this permit (40 CFR Part 60, Subpart A, 60.11 (c.) and (d), as adopted by reference in Colorado Regulation No. 6, Part A).The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any malfunction of the air pollution control equipment (40 CFR Part 60, Subpart A 60.7(b), as adopted by reference in Colorado Regulation No. 6, Part A).

1.13 Acid Rain:

This unit is subject to the Title IV Acid Rain Requirements. As specified in 40 CFR Part 72.72(b)(1)(x), the acid rain permit requirements shall be a complete and segregable portion of the Operating Permit. As such the requirements are found in Section III of this permit. The source shall demonstrate compliance with the Acid Rain requirements by submitting quarterly reports/compliance certifications and annual reports/certifications as specified in Section III.4 of this permit.

1.14 Emission Limit Exceedance Notification/Reporting Requirements (PSD Permit):

For the limits in this permit which are indicated to be limits taken from the PSD permit, the following excess emission reporting requirement applies (PSD Permit, revised according to Section 1, Condition 1.3, to make reporting timeframes consistent with Title V emergency provisions). This requirement is in addition to any other reporting requirements required by this permit or other applicable requirement.

The permittee shall verbally notify the Division as soon as possible of excess emissions, as defined by PSD Permit emission limits in this permit, (no later than noon of the Division's next working day following the excess emission) during periods of start-up, shutdown, equipment malfunction, or process upset. Written notice shall be provided to the Division within one month of the time when emission limitations were exceeded, and shall include all of the following information:

a. The identity of the stack or other emission point where excess emissions occurred;
b. The magnitude of excess emissions expressed int terms of permit conditions;
c. Pertinent operating data during the time of upset;
d The time duration of excess emissions;
e. The identity of the equipment or process causing the upset and the suspected reasons for the upset;
f. Steps and procedures taken during the upset period to minimize excess emissions;
g. Steps and procedures taken or anticipated to be taken to prevent reoccurrence of the upset conditions.

The source will be considered to be in violation of the limit(s) if the Division determines that the information submitted does not evidence a malfunction or upset condition caused by events beyond the control of the

permittee and the source exceeded the emission or operational limits described in the PSD permit. This applies to all emission limits, except for the opacity limit. An exceedance of the opacity limit during startup or shutdown will not be considered a violation as long as good operating practices are followed, as set forth in Condition 8.0 of this permit.

2. S101- 3,000 mmBtu/Hr Combustion Engineering Boiler

No. 2 Fuel Oil or Diesel Fuel

2.1 Secondary Fuel Use Records:

The permittee shall maintain records of annual usage of No.2 fuel oil and diesel fuel, and the associated annual heat content. If the total annual heat content of these fuels exceeds 5 percent of the total heat content of all fuels combusted, this permit shall be reopened to incorporate appropriate applicable requirements for combusting combined/alternative fuels.

In absence of credible evidence to the contrary, compliance with 40 CFR Part 60, Subpart Da, and Colorado Regulation No. 1, VI.B.4.b(ii) is assumed whenever the provisions of this Condition 2.1 are met.

3. P201 - Coal Unloading/Handling/Crushing and Conveying

Parameter	Permit Condition Number	Limitations		Emission Factors[1]	Monitoring	
					Method	Interval
Coal Throughput	3.1	S201 & S202 - Train Unloading Facility	2.5 x10^6 tons/year		Recordkeeping	Monthly
		S203 – Active Coal Pile Reclaim	1.5x10^6 tons/year			
		S204 - Coal Silo Filling & Conveyor Belt Transfer	2.5x10^6 tons/year			
		S205 - Coal Silo Discharge to Conveyor Belt	1.5x10^6 tons/year			
		S206 - Coal Crushing & Conveyor Belt Transfer	1.5x10^6 tons/year			
		S207 - Coal Conveyor Belt Transfer	1.5x10^6 tons/year			
		S208 - In-Plant Silo Filling Conveyor Belt Transfer	1.5x10^6 tons/year			
		S209 - Coal Pile Stockout	1.5x10^6 tons/year			

Parameter	Permit Condition Number	Limitations		Emission Factors[1]	Monitoring	
					Method	Interval
		S212 – Active Coal Storage Area & Handling Activities	$30x10^3$ tons stored			
		S213 - Inactive Coal Pile Storage Area	$330x10^3$ tons stored			
		S210 - Coal Crusher Stockout	$12x10^3$ tons/year			
		S211 - Coal Conveying	$2.5x10^6$ tons/year			
Opacity	3.2.1	20% - all sources except S212 and S213			Malfunction Alarm EPA Reference Method 9	Per Periodic Monitoring Plan
	3.2.2	20%, except as provided for below				
		For certain operational activities, not to exceed 30%, per Condition 10.2				
PM & PM_{10}	3.3	S201 & S202- Train Unloading Facility		PM: 0.0002 lb/tonPM_{10}: 0.0001 lb/ton	Emission Calculation for APEN Reporting	Annual
		S203 – Active Coal Pile Reclaim				
		S204 - Coal Silo Filling & Temporary Storage				
		S205 - Coal Silo Discharge				
		S207 - Coal Belt Transfer				
		S208 - In-Plant Silo Filling				
		S209- Coal Pile Stockout				
		S210 - Coal Crusher Stockout				
		S206 - Coal Crushing	0.08 tons/year PM 0.03 tons/year PM_{10}	PM:0.0202 lb/ton PM_{10}:0.0061 lb/ton	Compliance Determination and APEN Reporting	
		S211 - Coal Conveying		PM: 7.20 tons/acre/hr PM_{10}: 3.38 tons/acre/ton	Emission Calculation for APEN Reporting	
		S213 - Inactive Coal Pile Storage Area	21.8 tons/year PM	3.630×10^4 lb/acre/year		
		S212 – Active Coal Pile Storage Area & Handling Activities	72.0 tons/year PM			
Particulate	3.4	S211 - Coal Conveying			Inspection	Per Periodic

Parameter	Permit Condition Number	Limitations		Emission Factors[1]	Monitoring	
					Method	Interval
Matter Emissions Control Plan	3.5 3.6	S212 - Active Coal Pile Storage Area & Handling Activities S213 – Inactive Coal Pile Storage Area				Monitoring Plan
APEN Reporting	3.7				Recordkeeping and Calculation	Annually

[1] Uncontrolled Emission Factors

3.1 Coal Throughput:

Annual coal throughput shall not exceed the rates listed in the above table (Construction Permits 12LR525, revised according to Section I, Condition 1.3 of this permit, to increase throughput rates.). Compliance with the annual limit shall be determined on a rolling 12 month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data.

Monitoring, Recordkeeping and Reporting: The permittee shall maintain monthly records of either the belt scale or coal feeder data. The belt scale and/or feeder data shall be used to determine and show compliance with the annual total coal consumption limit. Such records shall be kept and made available for Division review upon request.

3.2 Opacity Limits:

Opacity shall not exceed the following limits.

3.2.1 Construction Permits 12LR525 and 40 CFR Part 60, Subpart Y, New Source Performance Standards for Coal Preparation Plants, limit opacity for any coal processing or conveying equipment, coal storage system, or coal transfer and loading system (all sources except S212 and S213) as follows:

The permittee shall not discharge into the atmosphere gases which exhibit 20% opacity or greater.

This opacity standard applies at all times except during periods of startup, shutdown, or malfunction. The permittee shall use good operating practices as set forth in Condition 8.0 of this permit (40 CFR Part 60, Subpart A, 60.11 (c.) and (d), as adopted by reference in Colorado Regulation No. 6, Part A). The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility, or any malfunction of the air pollution control equipment (40 CFR Part 60, Subpart A 60.7(b), as adopted by reference in Colorado Regulation No. 6, Part A).

Compliance with this limit shall be monitored as set forth in this Condition 3.2 and Section II, Condition 10 of this permit.

3.2.2 These sources, except for S209, S210, S212 and S213, are subject to the opacity requirements set forth in Conditions 10.1 and 10.2 of this permit.

Monitoring for Conditions 3.2.1 and 3.2.2: Each dust collector shall be equipped with a malfunction alarm. The alarm shall evaluate the filter differential pressure, screw conveyor operation, rotary valve operation, filter hopper level, exhaust fan operation, air compressor operation, and cleaning drive operation. Normal dust collector operation will exist as long as there is not an active dust collector malfunction alarm.

Each telescopic discharge chute shall be equipped with a malfunction alarm. The telescopic chute alarm evaluates the drive motor temperature, the coal pile level, for slack cable and overtravel, and for chute pluggage. Normal telescopic chute operation will exist as long as there is not an active telescopic chute malfunction alarm.

Abnormal Condition Monitoring: Abnormal Conditions exist when the malfunction alarm sounds. During abnormal dust collector operating periods when visible emissions persist for more than six (6) minutes, an EPA Reference Method 9 observations shall be performed within one-half hour. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

For the telescopic chute, when drop height exceeds five feet (as monitored by malfunction alarm), and when visible emissions beyond the edge of the coal stockout pile persist for more than six (6) minutes, an EPA Reference Method 9 observations shall be performed within one-half hour. In absence of credible evidence to the contrary, the Division shall consider the exceedance of the limit to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 observation is taken that shows that the opacity is less than the opacity limit.

Recordkeeping and Reporting: Compliance with bagfilter and telescopic chute performance criteria shall be recorded and demonstrated according to the Periodic Monitoring Plan (Appendix I). Records of all malfunctions resulting in opacity limit exceedances and the reason for such bagfilter or telescopic chute malfunction(s) shall be maintained and made available to the Division for inspection upon request.

All opacity observations shall be performed by an observer with a current and valid certification. Records of the results of any opacity observations and the observer's certificate shall be maintained and made available to the Division for review upon request. Copies of any observations exceeding the applicable standard shall be submitted with the next scheduled report.

The monitoring provisions set forth in Section II, Condition 10 of this permit shall be used to monitor compliance with the opacity limits for S206.

3.3 Particulate Matter Emission Limits:

The PM_{10} emission limit for S206 (Coal Crusher and Conveyor Belt Transfer) is incorporated directly into this permit, based on information submitted by the permittee for modification of Construction Permit 12LR525(7). Compliance with annual limits for the coal crusher and conveyor belt transfer shall be determined on a rolling twelve month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data. The permittee shall calculate monthly emissions and keep a compliance record on site for Division review.

To demonstrate compliance with the annual limits, annual estimated PM and PM_{10} emissions (tons/year) shall be calculated using the annual coal throughput, the emission factors listed in the table above (EPA's Compilation of Emission Factors (AP-42), September, 1998), and appropriate control equipment collection efficiencies. The moisture content of the coal as recorded in accordance with Section II, Condition 1.7 of this permit shall be used in the emissions estimates.

Compliance with the emission limits for fugitive sources S212 and S213 shall be monitored by not exceeding the process limits set forth in Condition 3.1, and by application of control measures, as set forth in Conditions 3.5 and 3.6, below.

Records of the emissions estimates shall be maintained and made available to the Division for inspection upon request.

3.4 Fugitive PM Emissions Control Plan - Coal Conveyor (S211):

Measures to minimize particulate matter emissions, as required by Colorado Regulation No. 1, shall be used at the coal conveyors. All above ground conveyors shall be enclosed by wind covers to reduce fugitive particulate emissions during coal transit.

Monitoring: The coal conveyor system, including coal conveyor enclosures and buildings, shall be inspected according to the Periodic Monitoring Plan (Appendix I).

3.5 Fugitive PM Emission Control Plan - Active Coal Storage Area (S212):

The following Particulate Emissions Control Plan shall be followed, as set forth for the Active Coal Storage Area in Construction Permit 12LR525(11)F:

3.5.1 Coal shall be stored behind earthen berms.(Revised in accordance with Section I, Conditon 1.3 of this permit)

3.5.2 A chemical stabilizer shall be applied to the coal at the mine or at the plant prior to the coal conveyor belt 1 transfer. If necessary, water or chemical stabilizer shall be applied to the surface of the pile to control fugitive emissions during disturbance of the pile. (Revised according to Section I, Condition 1.3 of this permit)

Monitoring: The Active Coal Storage Area shall be inspected according to the Periodic Monitoring Plan (Appendix I) to ensure the control measures are in place.

Recordkeeping and Reporting: Records of chemical stabilizer use shall be maintained and made available to the Division for inspection upon request.

3.6 Fugitive PM Emissions Control Plan - Inactive Coal Storage Area (S213):

The following Particulate Emissions Control Plan shall be followed, as set forth for the Inactive Coal Storage Area, in Construction Permit 12LR525(14)F:

3.6.1 The storage pile shall be compacted and crusting agent shall be applied.

3.6.2 Water shall be used to control fugitive emissions when the pile is disturbed during the removal or addition of coal.

Monitoring, Recordkeeping, and Reporting: Purchasing records of the crusting agents shall be maintained and made available to the Division upon request. The Inactive Coal Storage Area shall be inspected according to the Periodic Monitoring Plan to ensure the control measures are in place.

3.7 APEN Reporting

For APEN reporting and fee purposes, annual estimated PM and PM_{10} emissions (tons/year) shall be calculated using the actual annual coal throughput, the compliance and APEN emission factors listed in the table above, other appropriate emission factors as noted in Section II, Condition 13 of this permit, (i.e., EPA's compilation of Emission Factors, AP42, Fifth Edition, Volume 1: Stationary Point and Area Sources, Supplements A, B, C, D, E, F, Updates 2001, 2002, 2003 & 2004 and/or in EPA's FIRE 6.25 database), and appropriate control

equipment collection efficiencies. For fugitive emission sources, appropriate emission factors, control efficiencies, or equations shall be used.

4. P301 - Coal Combustion Ash Handling, Hauling and Disposal

Parameter	Permit Condition Number	Limitations		Emission Factors[1]	Monitoring	
					Method	Interval
Solid Wastes Throughput	4.1	S303 - Solid Wastes Silo Rotary Unloader Discharge	Baghouse Waste:148,650 tons/year Bottom - Ash Waste:24,750 tons/year		Recordkeeping	Monthly
		S308 - Solid Wastes Hauling to Landfill				
		S305 - Solid Wastes Haul Truck Unloading				
		S309 -Active/Exposed Landfill Area				
		S307 – Waste Landfilling/Reclamation				
		S306 - Bottom Ash Excavation and Loading				
		S302 - Solids Vacuum Conveying System and Silo Filling				
		S301 - Solid Wastes Silo Filling				
		S304 - Fly Ash And Solid Waste Silo Dry Unloading and Haul Truck Loading				
Opacity	4.2	S301,302,303 & 304 - Not to exceed 20%, except as provided for below			S301 & S302*:*Malfunction IndicationEPA Reference Method 9S303: Water SpraysS304: Proper Operation	As necessary
		For certain operational activities, not to exceed 30%, per Condition 10.2				
PM & PM_{10}	4.3	S303 - Solid Wastes Silo Rotary Unloader Discharge		PM: 0.22 lb/ton PM_{10}: 0.078 lb/ton	Calculation APEN Reporting	Annually
		S304 - Fly Ash and Solid Waste Silo Dry Unloading and Haul Truck Loading		PM: 0.22 lb/ton PM_{10}: 0.2 lb/ton		
		S308 - Solid Wastes Hauling to Landfill	PM: 51.32 tons/year PM_{10}:		Inspection	Per Periodic Monitoring

Parameter	Permit Condition Number	Limitations		Emission Factors[1]	Monitoring	
					Method	Interval
		S305 - Solid Wastes Haul Truck Unloading	51.32 tons/year		Recordkeeping	Plan
		S309 - Active/Exposed Landfill Area				Monthly
		S307 - Waste Landfilling/Reclamation				
		S306 - Bottom Ash Excavation and Loading				
		S301 - Solid Wastes Silo Filling		PM: 3.14 lbs/ton PM_{10}:1.10 lbs/ton	Calculation APEN Reporting	Annually
		S302 - Solids Vacuum Conveying System and Silo Filling	.	PM: 2,000 lb/ton PM_{10}: 1,000 lb/ton [2]		
Fugitive Particulate Emissions Control Plan	4.4	S308 - Solid Wastes Hauling to Landfill			Inspection	Per Periodic Monitoring Plan
		S305 - Solid Wastes Haul Truck Unloading				
		S309 - Active/Exposed Landfill Area				
		S307 - Waste Landfilling/Reclamation				
		S306 - Bottom Ash Excavation and Loading				
APEN Reporting	4.5				Recordkeeping and Calculation	Annually

[1] Uncontrolled Emission Factors
[2] Successive control equipment efficiencies are applied to the listed emission factors, to reduce emissions.

4.1 Solid Waste Throughput:

Handling of baghouse waste shall not exceed 148,650 tons/year, and handling of bottom-ash waste shall not exceed 24,750 tons/year (Construction Permit 12LR525(16)F). Compliance with the annual limit shall be determined on a rolling 12 month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data.

Monitoring: Compliance with the annual baghouse waste handling limit will be calculated from the coal consumption data, and the average percent ash results from coal analyses performed during the year, assuming an 85% fly-ash factor. Also included in the baghouse waste total is the lime throughput total and the mass

sulfate calculated from the mass SO_2 emissions and annual average SO_2 removal rate. The belt scale and/or feeder data as described in Condition 1.6 of this permit are used to determine the coal consumption, belt scale/feeder data or purchasing records are used to document the lime consumption, and the CEMS data are used to calculate the sulfate contribution. Rotary unloader process water is not included in the annual waste handling limit.

Annual Baghouse Waste = {(Coal Burned x % Flyash) + Lime Used + [(Annual Mass SO_2 Emission x 1.5 Sulfate Factor)/(1- SO_2 % Removed)*SO_2 % Removal]}

Compliance with the annual bottom ash waste handling limits will be calculated from the coal consumption data, and the average percent ash results from coal analyses performed during the year - assuming a 85% fly-ash factor and 15% bottom-ash factor. The belt scale and/or feeder data are used to determine the coal consumption. The bottom-ash sluice water weight is not included in the waste handling limits.

Annual Bottom-Ash Waste = (Coal Burned x % Bottom-Ash)

Recordkeeping and Reporting: The permittee shall maintain monthly records of the baghouse and bottom ash waste amounts. The data shall be used to determine and show compliance with the annual consumption limits. Such records shall be kept and made available for Division review upon request.

4.2 <u>Opacity Limits:</u>

These sources, except for S305 through S309, are subject to the opacity limits set forth in Conditions 10.1 and 10.2 of this permit.

Monitoring: The dust collector for S301 shall be equipped with a local malfunction alarm and delta pressure indicator. Operations personnel shall periodically monitor the dust collector status. Normal dust collector operation exists as long as there is not an active dust collector malfunction alarm.

The dust collector for S302 shall be equipped with a malfunction alarm. The alarm shall evaluate the filter differential pressure, discharge valve operation, and vacuum pump operation. Normal dust collector operation will exist as long as there is not an active dust collector malfunction alarm.

Abnormal operating periods exist when the malfunction alarm sounds. During abnormal operating periods when visible emissions persist for more than six (6) minutes, an EPA Reference Method 9 observations shall be performed within one-half hour. If such observation indicates an exceedance of the opacity limit, Method 9 observations shall be performed until two consecutive observations are in compliance. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

S303 - Solid Wastes Silo Rotary Unloader Discharge : The rotary unloaders are manually operated systems. The haul truck driver operates and monitors the operational status of the rotary unloader and its particulate control effectiveness. In addition, each rotary unloader is equipped with a malfunction alarm. The alarm evaluates each unloader for water supply pressure and seal purge air pressure. Normal rotary unloader operation will exist as long as there is not an active silo unloader malfunction alarm. In the absence of credible evidence to the contrary, compliance with the 20% opacity limit for S303 shall be presumed whenever the water sprays are in use.

S304 - Fly Ash And Solid Waste Silo Dry Unloading and Haul Truck Loading: The dry silo unloader with telescopic chute is a manually operated system. The driver of the haul truck operates and monitors the operational status of the dry unloader and its particulate control effectiveness. In the absence of credible evidence to the contrary, compliance with the 20% opacity limit for S304 shall be presumed whenever the driver properly operates the dry unloader.

Recordkeeping and Reporting: Compliance with bagfilter, telescopic chute, and rotary unloader performance shall be recorded and demonstrated according to the Periodic Monitoring Plan (Appendix I). Records of all malfunctions resulting in an emission limit exceedance and the reason for such malfunction(s) shall be maintained and made available to the Division for inspection upon request. Compliance and monitoring reports shall include this information.

All opacity observations shall be performed by an observer with a current and valid certification. Records of the results of any opacity observations and the observer's certificate shall be maintained and made available to the Division for review upon request. Copies of any observations exceeding the applicable standard shall be submitted with the next scheduled report.

4.3 Particulate Matter Emissions:

Emissions for sources S305 through 309 are listed in Construction Permit 12LR525(16)(F).

The emissions for fugitive sources S305 through 309 shall be monitored by not exceeding the process limits set forth in Condition 4.1, and by application of the control measures, as set forth in Condition 4.4, below.

Records of the emissions estimates shall be maintained and made available to the Division for inspection upon request.

4.4 Fugitive PM Emissions Control Plans:

The following Particulate Emissions Control Plan, set forth in Construction Permit 12LR525(16)F, shall be followed:

4.4.1 Haul Roads - No off-property transport of visible emissions shall apply to on-site haul roads, the nuisance guidelines shall apply to off-site haul roads. The 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended.

4.4.2 Haul Trucks - No off-property transport of visible emissions except that when operating off the property of the owner or operator, the applicable guidelines shall be no off-vehicle transport of visible emissions. The 20% opacity, no off-property transport, and nuisance emission limitation are guidelines and not enforceable standards and no person shall be cited for violation thereof pursuant to C.R.S. 1973, 25-7-115 as amended.

4.4.3 Water shall be used to control fugitive emissions during earthmoving operations.

4.4.4 The waste storage silo shall be equipped with a rotary unloader which mixes water with the waste material as it is transferred from the silo to haul trucks.

4.4.5 Haul roads shall be graveled and calcium chloride, magnesium chloride, or magnesium acetate and water shall be applied as necessary to remain viable as a fugitive emission control measure.

4.4.6 Waste material shall be unloaded while still wet to reduce fugitive emissions.

4.4.7 Soil replacement and revegetation shall take place annually after an area of approximately 1.5 acres in size has been completely filled.(Construction Permit 12LR525(16)F, as modified according to Section 1, Condition 1.3 of this permit)

Monitoring, Recordkeeping, and Reporting: These sources shall be inspected according to the Periodic Monitoring Plan (Appendix I) to ensure the control measures are in place.

4.5 APEN Reporting

For APEN reporting and fee purposes, annual estimated PM and PM_{10} emissions (tons/year) shall be calculated using the actual annual coal throughput, the ash apportionment process defined in Section 4.1, the APEN emission factors listed in the table above, or other appropriate emission factors as noted in Section II, Condition 13 of this permit (i.e, EPA's compilation of Emission Factors AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources, Supplements A, B, C, D, E, F, Updates 2001, 2002, 2003 & 2004 and/or in EPA's FIRE 6.25

database), and appropriate control equipment collection efficiencies. For fugitive emission sources, appropriate emission factors, control efficiencies or equations shall be used.

5. P401 - SDA SO_2 Scrubber Slurry Preparation Process

Parameter	Permit Condition Number	Limitations		Emission Factors	Monitoring	
					Method	Interval
Throughput	5.1	S401 - Scrubber Lime Storage Silo Filling	8,400 tons/year		Recordkeeping	Monthly
		S402 - Recycle Ash Storage Silo Filling	350,000 tons/year			
Opacity	5.2	Not to exceed 20%, except as provided for below			S402 - Nature of Source	When Silos Filled
		For certain operational activities, not to exceed 30%, per Condition 10.2				
APEN Reporting	5.3	S401 - Scrubber Lime Storage Silo Filling		PM: 2.2 lbs/ton PM_{10}: 1.1 lbs/ton	Recordkeeping and Calculation	Annually
		S402 - Recycle Ash Storage Silo Filling		PM: 3.14 lbs/ton PM_{10}: 1.10 lbs/ton		
PM/PM_{10}	5.4	S402 – Recycle Ash Storage Silo Filling	2.75 tons PM/year 0.96 ton PM_{10}/year	PM: 3.14 lbs/ton PM_{10}: 1.10 lbs/ton	Broken Bag Detectors	Continuous

5.1 <u>Lime and Recycle Ash Throughput:</u>

Lime throughput shall not exceed 8,400 tons/year (Construction Permit 12LR525(12)). Recycle fly ash throughput for S402 is limited to 350,000 tons/year (based on full load requirements calculated from measured recycle slurry feed rates) (incorporated directly into this operating permit per Section I, Condition 1.3 of this permit). Compliance with the annual limit shall be determined on a rolling 12 month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data.

Monitoring: Compliance with the annual lime handling limit will be calculated from the lime feed belt and scale measurements and/or lime purchase and delivery records. Compliance with the annual recycle ash silo throughput limit will be calculated from recycle slurry flow rates and the recycle slurry percent solids measurements, or by other equivalent alternative methods approved by the Division.

Recordkeeping and Reporting: Records of lime purchases shall be kept on a batch basis. A record of the monthly total purchases shall be maintained. Records of the flyash calculations shall be kept monthly. The data

shall be used to determine and show compliance with the annual consumption limits. Such records shall be kept and made available for Division review upon request.

5.2 Opacity Limits:

S401 and S402 are subject to the opacity limits set forth in Conditions 10.1 and 10.2 of this permit.

Monitoring: Operations personnel monitor the dust collectors operational status while lime is being conveyed into the storage silos. The lime silo fabric filter dust collectors exhaust inside the SDA building. In absence of credible evidence to the contrary, compliance with the opacity limits shall be assumed at all times when the discharge is exhausted inside the building.

The dust collector for S402 shall be equipped with a local malfunction alarm and delta pressure indicator. Operations personnel shall periodically monitor the dust collector status. Normal dust collector operation exists as long as there is not an active dust collector malfunction alarm.

The dust collector for S402 shall be equipped with a malfunction alarm. The alarm shall evaluate the filter differential pressure, discharge valve operation, and vacuum pump operation. Normal dust collector operation will exist as long as there is not an active dust collector malfunction alarm.

During abnormal operating periods when visible emissions persist for more than six (6) minutes, an EPA Reference Method 9 observations shall be performed within one-half hour. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

5.3 APEN Reporting:

For APEN reporting and fee purposes, annual estimated PM and PM_{10} emissions (tons/year) shall be calculated using the annual lime and ash throughputs, the APEN emission factors listed in the table above or other appropriate emission factors as noted in Section II, Condition 13 of this permit (i.e., EPA's Compilation of Emission Factors AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources, Supplements, A, B, C, D, E, F, Updates 2001, 2002, 2003 & 2004 and/or EPA's FIRE 6.25 database) and appropriate control equipment collection efficiencies. Records of the emissions estimates shall be maintained and made available to the Division for inspection upon request.

5.4 PM/PM_{10} Emission Limits

Emissions of air pollutants shall not exceed the limits listed in the table above. Compliance with the annual limits shall be determined on a rolling (12) month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months' data. (Colorado Regulation No. 3, Part B, III.A.4)

The S402 emission limit is subject to the CAM requirements set forth in Section II, Condition 15.

6. P501 - Miscellaneous Facility Processes

Parameter	Permit Condition Number	Limitations		Emission Factors	Monitoring	
					Method	Interval
Throughput	6.1	S501 - Unpaved Site Roadways and Parking Lots			Recordkeeping	Monthly
		S502 - PRS Soda Ash Storage Silo Filling	1,000 tons/year			
Opacity	6.2	S502 - Not to exceed 20%, except as provided below			Malfunction IndicationEPA Reference Method 9	Daily
		For certain operational activities, not to exceed 30%, per Condition 10.2				
APEN Reporting	6.3	S501 - Unpaved Site Roadways and Parking Lots			Recordkeeping and Calculation	Annually
		S502 - PRS Soda Ash Storage Silo Filling		PM: 3.14 lbs/ton PM_{10}: 1.10 lbs/ton		
Fugitive Particulate Emission Control Plan	6.4	S501 - Unpaved Site Roadways and Parking Lots			Inspection	Per Periodic Monitoring Plan

6.1 Soda Ash Throughput:

Soda ash throughput for the PRS Soda Ash Storage Silo is limited to 1,000 tons/year (incorporated directly into this Operating Permit, based on information supplied for a construction permit).Compliance with the annual limit shall be determined on a rolling 12 month total. By the end of each subsequent month a new twelve month total is calculated using the previous twelve months' data.

Monitoring: Compliance with the annual soda ash limit will be determined from purchase records.

Recordkeeping and Reporting: Records of the soda ash purchases shall be maintained on a monthly basis. The records shall be maintained on site and made available to the Division for inspection upon request.

6.2 Opacity Limits:

S502 is subject to the opacity limits set forth in Conditions 10.1 and 10.2 of this permit.

Monitoring: The dust collectors for S502 are only used when the PRS soda ash storage silos are being filled. Operations personnel shall monitor the dust collector's operational status while soda ash is being conveyed into the storage silos. Normal dust collector operation will exist as long as there is not an active dust collector malfunction indication or observed visible emissions.

If an active dust collector malfunction with visible emissions persists for more than six (6) minutes, an EPA Reference Method 9 observations shall be performed within one-half hour. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

Recordkeeping and Reporting: Compliance with bagfilter performance shall be recorded and demonstrated on days when soda ash deliveries occur. Records of all bagfilter malfunction(s) shall be maintained and made available to the Division for inspection upon request.

All opacity observations shall be performed by an observer with a current and valid certification. Records of the results of any opacity observations and the observer's certificate shall be maintained and made available to the Division for review upon request. Copies of any observations exceeding the applicable standard shall be submitted with the next scheduled report.

6.3 APEN Reporting:

For APEN reporting and fee purposes, annual estimated PM and PM_{10} emissions (tons/year) shall be calculated using the annual soda ash throughput, the APEN emission factors listed in the table above, or other appropriate emission factors as noted in Section II, Condition 13 of this permit (i.e., EPA's Compilation of Emission Factors AP-42, Fifth Edition, Volume 1: Stationary Point and Area Sources, Supplements A, B, C, D, E, F, Updates 2001, 2002, 2003 & 2004 and/or in EPA's FIRE 6.25 database), and appropriate control equipment collection efficiency.

The emission calculations for fugitive source S501 are based on information provided in the application. The emission estimate based on this information is listed on the Division's emission inventory system. For APEN reporting purposes, appropriate emission factors or equations shall be used.

Records of the emissions estimates shall be maintained and made available to the Division for inspection upon request.

6.4 Fugitive PM Emissions Control Plan - Unpaved Site Roadways/Parking Lots (S501):

The following measures, as required in Colorado Regulation No. 1, shall be employed to minimize particulate matter emissions from S501 (incorporated directly into this Operating Permit, based on information submitted for a construction permit):

6.4.1 No off-property transport of visible emissions shall apply to on-site unpaved roads and parking lots.

6.4.2 Unpaved roads and parking lots shall be graveled and calcium chloride, magnesium chloride, or magnesium acetate and water shall be applied as necessary to remain viable as a fugitive emission control measure.

6.4.3 The PSD permit requires that dust control on unpaved roads shall be accomplished by the application of chemical stabilizing agents supplemented with water.

Monitoring, Recordkeeping, and Reporting: The water and chemicals shall be added at a rate and frequency to minimize visible emissions when vehicles are using the roads. Records will be kept on the type, amount, and frequency that the chemicals are applied. These sources shall be inspected according to the Periodic Monitoring Plan (Appendix I) to ensure control measures are in place.

7. Cooling System and Pond

Parameter	Permit Condition Number	Limitations	Emission Factors	Monitoring	
				Method	Interval
Throughput	7.1			Recordkeeping	Monthly
APEN Reporting	7.2			Recordkeeping and Calculation	Annually

This source is exempt from Construction Permitting requirements, however, an APEN is required.

7.1 Water Throughput:

Records of the estimated annual amount of water circulated through the condenser system, in gallons, shall be maintained and made available to the Division for inspection upon request.

7.2 Emission Factors and APEN Reporting:

For APEN reporting and fee purposes, annual estimated emissions of reportable pollutants shall be calculated using the annual water throughput, and appropriate emission factors.

For purposes of this Operating Permit analysis, the emission factor of .00342 lb/mmgallons of circulated water was used ("Toxic Air Pollution Emission Factors," EPA-450/2-90-011, October, 1990).

Records of the emissions estimates shall be maintained and made available to the Division for inspection upon request.

8. 40 CFR Part 60, Subpart A, 60.11(d) Requirements

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 (40 CFR Part 60.11(d) as adopted by Reference in Colorado Regulation No. 6, Part A and Colorado Regulation No. 1, Section VI.B.4.a.(iv)).

9. Continuous Emission Monitoring and Continuous Opacity Monitoring Systems

9.1 CEM and COM Monitoring Systems QA/QC Plan

Continuous Emission Monitoring (CEM) and Continuous Opacity Monitoring (COM) systems are required for measurement of the scrubber inlet SO_2 and CO_2, stack SO_2, CO_2, NO_X (and diluent monitor for either CO_2 or O_2), gas flow rate and opacity emissions. A quality assurance/quality control plan shall be implemented within six (6) months of the issuance date of this permit. This plan shall be made available to the Division upon request. CEM and COM requirements for Part 75 are set forth in Section III of this permit.

9.2 General Provisions

9.2.1 The permittee shall ensure that all continuous emission and opacity monitoring systems required are in operation and monitoring unit emissions or opacity at all times that the boiler combusts any fuel except during those periods identified in 40 CFR Part 60, Subparts A and Da, and Appendix F. The permittee shall also ensure, subject to the exceptions just noted, that the continuous opacity monitoring systems required are in operation and monitoring opacity during the time following combustion when fans are still operating unless fan operation is not required to be included under any other applicable requirement.

9.2.2 Alternative monitoring system, alternative reference method, or any other alternative for the required continuous emission monitoring systems shall meet the applicable requirements established in 40 CFR Part 60, Subpart 60.47a and Part 75, Subpart E.

9.2.3 All test and monitoring equipment, methods, procedures and reporting shall be subject to the review and approval by the Division prior to any official use. The Division shall have the right to inspect such equipment, methods and procedures and data obtained at any time. The Division shall provide a witness(s) for any and all tests as Division resources permit.

9.2.4 A file shall be maintained of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by applicable portions of 40 CFR Part 60, Subparts A and Da, Appendices A, B, and F are recorded in a permanent form suitable for inspection. (40 CFR Part 60, Subpart A, 60.7(f))*Note: If the permittee maintains records of the data required by this condition, the permittee shall be considered to be in compliance with the requirement to maintain a "file" of the required data.*

9.2.5 Records shall be maintained of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the source; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.(60.7(b))

9.3 Continuous Emission Monitoring (CEM) Systems

9.3.1 The Continuous Emission Monitoring (CEM) Systems are subject to the requirements of 40 CFR Part 60, Subparts A and Da, and Appendices A, B, and F and shall meet the equipment, installation, and performance specifications therein.

9.3.2 For Acid Rain program monitoring and reporting the Continuous Emissions Monitoring (CEM) systems are subject to the requirements of 40 CFR Part 75, and Appendix A and B, and shall meet the equipment, installation, and performance specifications therein.

9.4 Continuous Opacity Monitoring (COM) Systems

9.4.1 The Continuous Opacity Monitoring (COM) Systems are subject to the requirements of 40 CFR Part 60. Each continuous opacity monitoring system shall meet the design, installation, equipment and performance specifications in 40 CFR Part 60, Appendix B, Performance Specification 1.

9.4.2 The permittee shall follow the quality assurance and quality control procedures of 40 CFR Part 60, Subpart A §60.13 and with procedures set forth in the Periodic Monitoring Plan (Appendix I).

When the opacity monitoring system is unable to provide quality assured data in accordance with 40 CFR Part 75, the source may elect to utilize either a backup opacity monitor or EPA Reference Method 9, or an "Operating Report During Monitor Unavailability" to satisfy the requirements for periodic monitoring under 40 CFR 70 and Colorado Regulation No. 3.

a. If backup monitors are used, the next quarterly report submitted by the source shall identify the dates and times the backup monitors were in use.

b. If EPA Reference Method 9 observations are used, visual observations in accordance with the reference method shall be taken and recorded by the source whenever the source is in operation and the opacity monitoring system has been out of service for more than eight (8) consecutive hours while fuel is present in the boiler.

When such circumstances exist, the visual observations shall be performed by a certified opacity observer each 24 hour period thereafter over a thirty minute period until the opacity monitoring system is again able to provide quality assured data. If a visual emissions observation cannot be performed in accordance with EPA Reference Method 9, the source shall record the reasons why that is the case. If any of the EPA Reference Method 9 opacity observations required above exceed the applicable standard, additional EPA Reference Method 9 observations must be performed until two (2) consecutive observations indicate that the source is in compliance with the applicable opacity limitation. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

c. If an "Operating Report During Monitor Unavailability" is used, the source shall record the opacity monitor registered reading prior to the monitor unavailability period and that immediately following such periods. A source must also record and maintain a description of unit operating characteristics that demonstrate the likelihood of compliance with the applicable opacity limitation. Such operating circumstances shall be identified on a unit specific basis and provided to the Division and shall include information related to the operation of the control equipment and any other operational parameters that may affect opacity.

A clear, readable, and permanent copy of the observer's certificate shall be kept with the observations. The observations and the certificate shall be made available to the Division for review upon request.

9.5 Notification and Recordkeeping

The owner or operator of a facility required to install, maintain, and calibrate continuous monitoring equipment shall submit to the Division, by the 30th day following the end of each calendar quarter, a report of excess emissions for all pollutants monitored for that quarter. This report shall consist of all information required in 40 CFR Part 60, Subparts A and Da, and Appendix B and Appendix F, as relevant, and the following information and/or reporting requirements as specified by the Division.(Colorado Regulation No. 1, IV.G)

9.5.1 The magnitude of excess emissions computed in accordance with Division guidelines (in units of the standard or the emission limit, and the same averaging time, if applicable), any conversion factor(s) used, and the date and time of commencement and completion of each time period of excess emissions.

9.5.2 The nature and cause of the excess emissions, if known.

9.5.3 The date and time identifying each period of equipment malfunction and the nature of the system repairs or adjustments, if any, made to correct the malfunction.

9.5.4 A schedule of the calibration and maintenance of the continuous monitoring system. Calibration checks shall occur daily, and routine maintenance shall be performed according to the monitoring plan or according to the manufacturer's specifications, whichever is more frequent.

9.5.5 Compliance with the reporting requirements of this section shall not relieve the owner or operator of the reporting requirements of Section II.E of the Common Provisions Regulation concerning upset conditions and breakdowns.

10. Opacity Limits

The following limits apply to those sources referenced throughout this permit.

10.1 Except as provided in Condition 10.2, below, no owner or operator of a source shall allow or cause the emission into the atmosphere of any air pollutant which is in excess of 20% opacity. This standard is based on 24 consecutive opacity readings taken at 15-second intervals for six minutes. The approved reference test method for visible emissions measurement on which the Regulation No. 1 standards are based is EPA Method 9 (40 CFR, Part 60, Appendix A (July 1992)), unless otherwise specified in this permit. (Colorado Regulation No. 1, II.A.1).

10.2 No owner or operator of a source shall allow or cause to be emitted into the atmosphere any air pollutant resulting from the building of a new fire, cleaning of fire boxes, soot blowing, start-up, any process modification, or adjustment or occasional cleaning of control equipment, 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, II.A.4).

Monitoring for sources subject to Conditions 10.1 and/or 10.2 shall be performed as follows (except for S209, S210, S303, S304, and S401).

An EPA Reference Method 9 visual opacity observation (in accordance with 40 CFR Part 60, Appendix A, as adopted by reference in Colorado Regulation No. 6, Part A) shall be performed at least annually. If any such observation indicates an exceedance of the limit, additional observations shall be performed. Consecutive observations shall be performed until two consecutive observations are in compliance with the standard. All EPA Reference Method 9 readings shall be conducted by a certified observer. Subject to the provisions of C.R.S. 25-7-123.1 and in the absence of credible evidence to the contrary, exceedance of the limit shall be considered to exist from the time a Method 9 reading is taken that shows an exceedance of the opacity limit until a Method 9 reading is taken that shows that the opacity is less than the opacity limit.

Records of the results of EPA Reference Method 9 readings and a copy of the EPA Reference Method 9 reader's certification shall be kept on site and made available to the Division upon request. Copies of any observations exceeding the applicable standard(s) shall be submitted with the next scheduled report.

At all other times, in the absence of credible evidence to the contrary, compliance with the opacity limits shall be assumed provided that: for those sources controlled by bagfilters, the Operating and Maintenance Plan requirements set forth below are met.

Note: For S209 and S210, in the absence of credible evidence to the contrary, compliance with the opacity limits shall be presumed as long as there are no active telescopic chute malfunction alarms, as set forth in Section II, Condition 3.2.2 of this permit. For S303, in absence of credible evidence to the contrary, compliance with the opacity limits shall be presumed whenever the water sprays are in use, as set forth in Section II, Condition 4.2 of this permit. For S304, in the absence of credible evidence to the contrary, compliance with the opacity limits shall be presumed whenever the driver properly operates the dry unloader, as set forth in Section II, Condition 4.2. For S401, in the absence of credible evidence to the contrary, compliance with the opacity limits shall be assumed at all times when the discharge is exhausted inside the building, as set forth in Section II, Condition 5.2 of this permit.

Bagfilter Operation and Maintenance

Routine maintenance of and operational procedures performed on the baghouses shall be conducted in accordance with manufacturer's specifications and good engineering practices. These procedures shall be in written format. Any maintenance work performed shall be documented and maintained to be made available to the Division upon request.

11. Insignificant Activities

11.1 The permittee shall at least annually review and determine whether the insignificant activities are in compliance with all applicable requirements. The permittee shall maintain a record of the compliance determination, and any additions, deletions or changes to the insignificant source inventory made during the reporting period. The inventory of insignificant sources provided in the permit application is included in Appendix A of this permit as a starting reference.

12. Reporting

All reports shall be postmarked within the first thirty (30) days immediately following the end of the reporting period, unless a different response time is identified elsewhere in this permit. Appendix H lists the required Reports related to this permit for this facility. The compliance monitoring report shall be in the format identified in Appendix B of this permit.

13. Emission Factors

The permittee shall comply with the provisions of Regulation No. 3 concerning APEN reporting. Emission factors that are approved compliance factors specified within this permit can not be adjusted without requiring a permit modification. Emission factors and/or other emission estimating methods used only to comply with the reporting requirements of Regulation No. 3, Part A, Section II can be updated and modified as specified in that Section. These change by themselves, do not require any permitting activities though the resulting emission estimate may trigger permitting activities.

14. Voluntary Emissions Reduction Agreement (State-only requirement)

14.1 Definitions

The capitalized terms used in the Voluntary Emissions Reduction Agreement shall have the meanings given them in the Act. In addition, the terms set forth below shall have the following definitions.(Paragraph 1 of Voluntary Emissions Reduction Agreement)

14.1.1 "Force Majeure" means any event arising in whole or in part from causes beyond the control of Platte River that delays or prevents or can reasonably be anticipated to delay or prevent Platte River from meeting the emissions limitations by the Compliance Date despite Platte River's good faith effort to meet the Compliance Date. Increase costs does not by itself constitute a Force Majeure event.

14.1.2 "Upset Condition" means "Upset Condition" as defined under the Colorado Air Quality Control Regulations, Common Provisions Regulation, § II.E.

14.1.3 "Compliance Date" means January 1, 2003, as the day that calculations for compliance with the SO_2 emission rate shall commence and July 15, 2006, as the day that calculations for compliance with the NOx emission rate shall commence.

14.1.4 "Startup Period" means the six-month period following the Compliance Date.

14.1.5 "Startup Problem" means: (1) defects in the design or construction of any pollution control equipment that Platte River could not have reasonably controlled; or (2) equipment or operational problems arising in any way from the startup of new pollution control equipment.

14.2 Sulfur Dioxide and Nitrogen Oxides Emission Limitations

14.2.1 Platte River's obligation to meet new SO_2 and NOx emission limitations at Rawhide Unti 101 shall commence on the Compliance Date listed above, subject to a Force Majeure event or startup problem as defined above.(Paragraph 2 of Voluntary Emissions Reduction Agreement)

14.2.1.1 <u>SO_2 Limitation</u> An SO_2 emission rate of 0.090 lb/mmBtu determined on a calendar year annual average basis effective January 1, 2003.

Compliance with this limitation shall be monitored using the CEMs required in Section I, Conditions 1.8 and 9 of this permit.

14.2.1.2 <u>NOx Limitation</u> A NOx emission rate of 0.180 lb/mmBtu as determined on a calendar year annual average basis effective July 15, 2006. During the period July 15, 2006, to December 31, 2006, the 30-day rolling average of NOx emissions shall not exceed 0.19 lb/mmBtu.

Compliance with this limitation shall be monitored using the CEMs required in Section I, Conditions 1.8 and 9 of this permit.

14.2.1.3 <u>Startup Period</u> During the Startup Period, if Platte River cannot reasonably comply with the SO_2 and NOx emissions limitations contained in the Agreement as a result of a Startup Problem, Platte River shall be excused from complying with the emission limitation to the extent that noncompliance is caused by the Startup Problem; provided Platte River: (i.) provides the Division with written notice of the Startup Problem within one month of the date on which it first had knowledge of the Startup Problem, and includes in its notice a description of the Startup Problem and steps taken to correct the Startup Problem and (ii) makes all reasonable efforts to operate Rawhide Unit 101 so that the unit complies with the emission limitation set forth in the Agreement. All emissions, including those related to Startup Problems, must be reported to the Division in accordance with Paragraph 6 of the Agreement (Condition 14.4, below).

14.3 Regulatory Assurance Period

Pursuant to Colo. Rev. Stat. § 25-7-1203, Rawhide Unit 101 is granted the Regulatory Assurances detailed below and shall not be required to install additional pollution control equipment or implement additional pollution control strategies to reduce SO_2 or NOx beyond those agreed herein subject to the limitations set forth in Colo. Rev. Stat. § 25-7-1204 and the exceptions set forth in Colo. Rev. Stat § 25-7-1205; provided, however, that the installation of SO_2 and NOx controls required by this Agreement will not be considered a modification or reconstruction of a stationary source after the date of the Agreement.(Paragraph 4 of the Voluntary Emissions Reduction Agreement)

14.3.1 Twelve years after the Compliance Date for requirements to install additional pollution control equipment or implement additional pollution control strategies to reduced SO2 emissions which may be extended in accordance with Section 11 of the Agreement; and

14.3.2 Fifteen years after the Compliance Date for requirements to install additional pollution control equipment or implement additional pollution control strategies to reduce NOx emissions.

14.4 Reporting and Recordkeeping

14.4.1 Beginning one year after the Compliance Date for SO_2 and 6 months after the Compliance Date for NOx and continuing each year thereafter, Platte River shall submit an annual emissions report to the Division within 30 days after the end of the first calendar quarter. The annual report shall describe the average SO_2 and NOx emission rate (in lb/mmBtu).(Paragraph 6.a of the Voluntary Emissions Reduction Agreement)

14.4.2 Platte River shall maintain records of all data and other information used to prepare its annual report for a period of five years after the date of the report. (Paragraph 6.b of the Voluntary Emissions Reduction Agreement)

15. Compliance Assurance Monitoring

15.1 The Compliance Assurance Monitoring (CAM) requirements in 40 CFR Part 64, as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV, apply to the boiler (S101) with respect to the PM limitations identified in Section II, Condition 1.1 and to the recycle ash storage silo (S402) with respect to the PM/PM_{10} limitations identified in Section II, Condition 5.4 as follows:

15.1.1 The permittee shall follow the CAM Plan provided in Appendix J of this permit. Excursions, for purposes of reporting are any instance in which opacity is 5% or greater; or a sustained discharge air system particulate matter reading greater than 80% of full scale reading. Excursions shall be reported as required by Section IV, Conditions 21 and 22.d of this permit.

15.1.2 Operation of Approved Monitoring

15.1.2.1 At all times, the owner or operator shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment (40 CFR Part 64 § 64.7(b), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.2.2 Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of these CAM requirements, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions (40 CFR Part 64 § 64.7(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.2.3 Response to excursions or exceedances

a. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable (40 CFR Part 64 § 64.7(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Determination of whether the owner of operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated

capture system, and the process (40 CFR Part 64 § 64.7(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.2.4 After approval of the monitoring required under the CAM requirements, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the Division and, if necessary submit a proposed modification for this permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters (40 CFR Part 64 § 64.7(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3 Quality Improvement Plan (QIP) Requirements

15.1.3.1 Based on the results of a determination made under the provisions of Condition 15.5.2.3.b, the Division may required the owner or operator to develop and implement a QIP (40 CFR Part 64 § 64.8(a), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3.2 The owner or operator shall maintain a written QIP, if required, and have it available for inspection (40 CFR Part 64 § 64.8(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3.3 The QIP initially shall include procedures for evaluating the control performance problems and, based on the results of the evaluation procedures, the owner or operator shall modify the plan to include procedures for conducting one or more of the following actions, as appropriate:

a. Improved preventative maintenance practices (40 CFR Part 64 § 64.8(b)(2)(i), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Process operation changes (40 CFR Part 64 § 64.8(b)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

c. Appropriate improvements to control methods (40 CFR Part 64 § 64.8(b)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

d. Other steps appropriate to correct control performance (40 CFR Part 64 § 64.8(b)(2)(iv), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

e. More frequent or improved monitoring (only in conjunction with one or more steps under Conditions 3.5.3.3.a through d above) (40 CFR Part 64 § 64.8(b)(2)(v), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3.4 If a QIP is required, the owner or operator shall develop and implement a QIP as expeditiously as practicable and shall notify the Division if the period for completing the improvements contained in the QIP exceeds 180 days from the date on which the need to implement the QIP was determined (40 CFR Part 64 § 64.8(c), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3.5 Following implementation of a QIP, upon any subsequent determination pursuant to Condition 15.5.2.3.b, the Division or the U.S. EPA may require that an owner or operator make reasonable changes to the QIP if the QIP is found to have:

a. Failed to address the cause of the control device performance problems (40 CFR Part 64 § 64.8(d)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); or

b. Failed to provide adequate procedures for correcting control device performance problems as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions (40 CFR Part 64 § 64.8(d)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.3.6 Implementation of a QIP shall not excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act (40 CFR Part 64 § 64.8(e), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.4 Reporting and Recordkeeping Requirements

15.1.4.1 <u>Reporting Requirements:</u> The reports required by Section IV, Condition 22.d, shall contain the information specified in Appendix B of the permit and the following information, as applicable:

a. Summary information on the number, duration and cause (including unknown cause, if applicable), for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable) ((40 CFR Part 64 § 64.9(a)(2)(ii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV); and

b. The owner or operator shall submit, if necessary, a description of the actions taken to implement a QIP during the reporting period as specified in Condition 15.5.3 of this permit. Upon completion of a QIP, the owner or operator shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring (40 CFR Part 64 § 64.9(a)(2)(iii), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.4.2 General Recordkeeping Requirements: In addition to the recordkeeping requirements in Section IV, Condition 22.a through c.

a. The owner or operator shall maintain records of any written QIP required pursuant to Condition 15.5.3 and any activities undertaken to implement a QIP, and any supporting information required to be maintained under these CAM requirements (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions) (40 CFR Part 64 § 64.9(b)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

b. Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements (40 CFR Part 64 § 64.9(b)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.5 Savings Provisions

15.1.5.1 Nothing in these CAM requirements shall excuse the owner or operator of a source from compliance with any existing emission limitation or standard, or any existing monitoring, testing, reporting or recordkeeping requirement that may apply under federal, state, or local law, or any other applicable requirements under the federal clean air act. These CAM requirements shall not be used to justify the approval of monitoring less stringent than the monitoring which is required under separate legal authority and are not intended to establish minimum requirements for the purposes of determining the monitoring to be imposed under separate authority under the federal clean air act, including monitoring in permits issued pursuant to title I of the federal clean air act. The purpose of the CAM requirements is to require, as part of the issuance of this Title V operating permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of CAM (40 CFR Part 64 § 64.10(a)(1), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.5.2 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to impose additional or more stringent monitoring, recordkeeping, testing or reporting requirements on any owner or operator of a source under any provision of the federal clean air act, including but not limited to sections 114(a)(1) and 504(b), or state law, as applicable (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

15.1.5.3 Nothing in these CAM requirements shall restrict or abrogate the authority of the U.S. EPA or the Division to take any enforcement action under the federal clean air act for any violation of an applicable requirement or of any person to take action under section 304 of the federal clean air act (40 CFR Part 64 § 64.10(a)(2), as adopted by reference in Colorado Regulation No. 3, Part C, Section XIV).

SECTION III - Acid Rain Requirements

1. Designated Representative and Alternate Designated Representative

Designated Representative:

Name: Jason Frisbie
Title: Division Manager, Power Production
Phone: (970) 229-1705

Alternate Designated Representative:
Name: Paul Schulz
Title: Environmental Analyst
Phone: (970) 229-1762

SUBMITTAL DEADLINES:

Quarterly Reports and Compliance Certifications: within thirty (30) days after the end of each calendar quarter

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2. Sulfur Dioxide Emission Allowances and Nitrogen Dioxide Emission Limitations

Unit 101	1998	1999	2000	2001	2002
SO_2 Allowances, per 40 CFR Part 73.10(b), Table 2	N/A	N/A	1789*	1789*	1789*
NO_x Limits per 40 CFR Part 76.8**	N/A	N/A	0.45 lbs/mmBtu	0.45 lbs/mmBtu	0.45 lbs/mmBtu

* Under the provisions of §72.84(a) any allowance allocations to, transfers to and deductions from an affected unit's Allowance Tracking System account is considered an automatic permit amendment and as such no revision to the permit is necessary. Numerical allowances shown in this table are from the 1996 edition of the CFR.

** Pursuant to 40 CFR 76.8(d)(2), the State approves a NO_X early election compliance plan for Unit 101, under Phase II of the Acid Rain Program. Approval is effective January 1, 2000 through December 31, 2007, under which this Unit's annual average NO_X emission rate for each year, determined using the methods and procedures specified in 40 CFR Part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.5(a)(1), of 0.45 lbs/mmBtu for a tangentially fired boiler. If the unit is in compliance with its applicable emission limitation for each year of the plan, then the Unit shall not be subject to the applicable emission limitation, under 40 CFR 76.7(a)(1), of 0.40 lbs/mmBtu until January 1, 2008.

1. NO_X Early Election

The source elected to comply with the Phase I NO_X Requirements beginning in 1997. The source has certified that they will comply with the following provisions for early election units.

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NOX as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(iii).

Liability. The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77.

Termination. An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect.

If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan.

The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect.

(i) If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_X for Phase II units with Group 1 boilers under 40 CFR 76.7.

(ii) If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_X for Phase II units with Group 1 boilers under 40 CFR 76.7.

2. Standard Requirements

Unit 101 of this facility is subject to and the source has certified that they would comply with the following standard conditions.

Permit Requirements.

(1) The designated representative of each affected source and each affected unit at the source shall:

(i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and

(ii) Submit in a timely manner any supplemental information that the Division determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;

(2) The owners and operators of each affected source and each affected unit at the source shall:

(i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the Division; and

(ii) Have an Acid Rain Permit.

Note: The Permittee has already completed these requirements.

Monitoring Requirements.

(1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR parts 74, 75, and 76.

(2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.

(3) The requirements of 40 CFR parts 74 and 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Federal Clean Air Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements.

(1) The owners and operators of each source and each affected unit at the source shall:

(i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)) not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and

(ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.

(2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Federal Clean Air Act.

(3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:

(i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or

(ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).

(4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.

(5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1)(I) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.

(6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or the written exemption under 40 CFR 72.7 and 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

Nitrogen Oxides Requirements.

The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements.

(1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan to the Administrator of the U. S. EPA, as required under 40 CFR part 77.

(2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:

(i) Pay without demand, to the Administrator of the U. S. EPA, the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and

(ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements.

(1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or the Division:

(i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;

(ii) All emissions monitoring information, in accordance with 40 CFR part 75;

(iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,

(iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.

(2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability. (for informational purposes only)

(1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or a written exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113C of the Federal Clean Air Act.

(2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113C of the Federal Clean Air Act and 18 U.S.C. 1001.

(3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.

(4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

(5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.

(6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NOx averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.

(7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Federal Clean Air Act.

Effect on Other Authorities.

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or a written exemption under 40 CFR 72.7 or 72.8 shall be construed as:

(1) Except as expressly provided in title IV of the Federal Clean Air Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Federal Clean Air Act, including the provisions of title I of the Federal Clean Air Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;

(2) Limiting the number of allowances a unit can hold; provided, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Federal Clean Air Act;

(3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;

(4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,

(5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

3. Reporting Requirements

Reports shall be submitted to the addresses identified in Appendix D.

Pursuant to 40 CFR Part 75.64 quarterly reports and compliance certification requirements shall be submitted to the Administrator **within 30 days after the end of the calendar quarter**. The contents of these reports shall meet the requirements of 40 CFR 75.64. A copy of the compliance certification shall also be submitted to the Division.

Pursuant to 40 CFR Part 75.65 excess emissions of opacity shall be reported to the Division. These reports shall be submitted in a format approved by the Division.

Revisions to this permit shall be made in accordance with 40 CFR Part 72, Subpart H, 72.80 through 72.85 (as adopted by reference in Colorado Regulation 18). Permit modification requests shall be submitted to the Division at the address identified in Appendix D.

SECTION IV - 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 modifications or reconstruction on which construction commenced prior to permit issuance.

Source	Requirement	Justification
Facility-Wide, except for S101 and S402 PM/PM_{10} emission limits	40 CFR Part 64	Units at this facility are not subject to the Compliance Assurance Monitoring rule

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 as identified 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 serve as a compliance determination for purposes of the associated subsumed requirements.

Source	Requirement	Justification
S101- 3,000 mmBtu/hour boiler, coal fired	40 CFR Part 60, Subpart Da, 60.44a (NO_x emission limit for coal firing) and Construction Permit 12LR525(1), Condition 6.	These applicable requirements are streamlined out. The PSD permit BACT limit is more stringent because it applies at all times except malfunction or upset conditions. By streamlining this requirement out and providing the permit shield, the permittee will not be in violation of the NSPS or Construction Permit requirements if the NO_x emission limit in this operating permit is violated. In addition, the Division has determined that the 3 hour averaging time contained in the Construction Permit was in error, and should be 30 day, consistent with Subpart Da and the PSD permit.
	40 CFR Part 60, Subpart Da, SO_2 limit for coal firing	This applicable requirement is streamlined out because the PSD Permit limit of 80% is more stringent than this NSPS 70% reduction requirement
	Colorado Regulation No. 6, Part B, II.D.1.c - SO_2 emission limit for coal firing	This applicable requirement is streamlined out because Construction Permit, NSPS, and BACT limits are more stringent
	Colorado Regulation No. 1, III.A.1.c - PM emission limit	This applicable requirement is streamlined out because Construction Permit, NSPS, and BACT limits are more stringent

SECTION V - 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, and pursuant to regulations promulgated by the Commission.

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

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

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

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

(ii) Safe sampling platform(s);

(iii) Safe access to sampling platform(s); and

(iv) Utilities for sampling and testing equipment.

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

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

d. Upset Conditions and Breakdowns

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

e. Circumvention Clause

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

f. Compliance Certifications

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

When compliance or non-compliance is demonstrated by a test or procedure provided by permit or other applicable requirement, the owner or operator shall be presumed to be in compliance or non-compliance unless other relevant credible evidence overcomes that presumption.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4. Compliance Requirements

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

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

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

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

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

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

C.R.S. §§ 25-7-114.1(6) and 25-7-114.7

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

b. The permittee shall pay a permit processing fee in accordance with the provisions of C.R.S. § 25-7-114.7. If the Division estimates that processing of the permit will take more than 30 hours, it will notify the

permittee of its estimate of what the actual charges may be prior to commencing any work exceeding the 30 hour limit.

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

9. Fugitive Particulate Emissions

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

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

10. Inspection and Entry

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

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

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

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

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

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

11. Minor Permit Modifications

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

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

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. Unless required by a permit term or condition to report deviations on a more frequent basis, "prompt" reporting shall entail submission of reports of deviations from permit requirements every six (6) months in accordance with paragraph 22.d. below. "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 enhanced monitoring rule, or the Division

requires submission on a more frequent basis. All instances of deviations from any permit requirements must be clearly identified in such reports.

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

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.

c. No owner or operator of a bulk gasoline terminal, bulk gasoline plant, or gasoline dispensing facility as defined in Colorado Regulation No. 7, Section VI, shall permit gasoline to be intentionally spilled, discarded in sewers, stored in open containers, or disposed of in any other manner that would result in evaporation.

30. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

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

END OF PERMIT REQUIREMENTS

OPERATING PERMIT APPENDICES

DISCLAIMER:
None of the information found in these Appendices shall be considered to be State or Federally enforceable and is presented for informational purposes only, except for Appendix I, which sets forth the monitoring method for certain sources permitted in this permit.

APPENDIX A - Inspection Information

Directions to Plant:

The facility is located at 2700 East County Road 82, north of Wellington, CO.

Safety Equipment Required:

Eye Protection
Hard Hat
Safety Shoes
Hearing Protection
Gloves

Facility Plot Plan:

Figure 1 (following page) shows the plot plan submitted with the 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.

Noncommercial (in-house) experimental and analytical laboratory equipment which is bench scale in nature including quality control/quality assurance laboratories, process support laboratories, environmental laboratories supporting a manufacturing or industrial facility, and research and development laboratories.

Disturbance of surface areas for purposes of land development, which do not exceed 25 contiguous acres and which do not exceed six months in duration. (This does not include mining operations or disturbance of contaminated soil.)

Each individual piece of fuel burning equipment, other than smokehouse generators and internal combustion engines, which uses gaseous fuel, and which has a design rate less than or equal to 5 million Btu per hour.

Chemical storage tanks or containers that hold less than 500 gallons, and which have a daily throughput less than 25 gallons.

Landscaping and site housekeeping devices equal to or less than 10 HP in size (lawnmowers, trimmers, snow blowers, etc.).

Chemical storage areas where chemicals are stored in closed containers, and where total storage capacity does not exceed 5000 gallons. This exemption applies solely to storage of such chemicals. This exemption does not apply to transfer of chemicals from, to, or between such containers.

Oil production wastewater (produced water tanks), containing less than 1% by volume crude oil, except for commercial facilities which accept oil production wastewater for processing.

Storage tanks of capacity < 40,000 gallons of lubricating oils.

Venting of compressed natural gas, butane or propane gas cylinders, with a capacity of 1 gallon or less.

Fuel storage and dispensing equipment in ozone attainment areas operated solely for company-owned vehicles where the daily fuel throughput is no more than 400 gallons per day, averaged over a 30 day period.

Storage tanks meeting all of the following criteria:

(i) annual throughput is less than 400,00 gallons; and
(ii) the liquid is one of the following:
  (A) diesel fuels 1-D, 2-D or 4-D;
  (B) fuel oils #1 through #6;
  (C.) gas turbine fuels 1-GT through 4-GT;
  (D) an oil/water mixture with a vapor pressure lower than that of diesel fuel (Reid vapor pressure of 0.025 PSIA).

Each individual piece of fuel burning equipment which uses gaseous fuel, and which has a design rate less than or equal to 10 million Btu per hour, and which is solely for heating buildings for personal comfort.

Stationary Internal Combustion Engines which:

(i) power portable drilling rigs; or
(ii) are emergency power generators which have a rated horsepower of less than 260 or; operate no more than 250 hours per year and have a rated horsepower of less than 737; or operate no more than 100 hours per year and have a rated horsepower of less than 1840; or
(iii) have actual emissions less than five tons per year or rated horsepower of less than 50.

Surface mining activities which mine 70,000 tons or fewer of product material per year. A fugitive dust control plan is required for such sources. Crushers, screens and other processing equipment activities are not included in this exemption.

Air pollution emission units, operations or activities with emissions less than the appropriate de minimis reporting level.

Boiler water/steam discharges (including condensate storage, boiler blowdown, deaerator and heater vents)

Turbine lube oil system venting

Emergency fire-water pump engine exhaust

Gasoline Storage Tank (Fire training, and < de minimis)

Kerosene Storage Tank (Fire training, and < de minimis)

Parts Cleaning Solvent (< de minimis)

Boiler chemical cleaning wastewater emissions - boiler evaporation

Boiler chemical cleaning wastewater emissions - bottom ash pond evaporation

Vents on water treatment system chemical feed tanks

Exhaust from portable welder, and water pump engines

Solvent use and solvent bath emissions

Lime slaking/ball mill vent discharge

Appendix B
Reporting Requirements and Definitions

no codes ver 9/20/05

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

For reporting purposes, the Division has combined the Monitoring Deviation Report with the Permit Deviation Report.

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

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

Compliance Certifications are intended to state the compliance status of each requirement of the permit over the certification period. They must be based, at a minimum, on the testing and monitoring methods specified in the permit that were conducted during the relevant time period. In addition, if the owner or operator knows of other

material information (i.e. information beyond required monitoring that has been specifically assessed in relation to how the information potentially affects compliance status), that information must be identified and addressed in the compliance certification. The compliance certification must include the following:

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

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

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 (Common Provisions Section II.E), certain operational conditions may act as an affirmative defense against enforcement action if they are properly reported.

DEFINITIONS

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

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

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

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

APPENDIX B: Monitoring and Permit Deviation Report - Part I

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

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

FACILITY NAME: Platte River Power Authority – Rawhide Energy Station
OPERATING PERMIT NO: 96OPLR142
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]		Upset/Emergency Condition Reported During Period?	
		YES	NO	YES	NO
B001	3,000 mmBtu/hr Combustion Engineering #1930618				
P201	S201 & S202 – Train Unloading Facility – Subsystem #1 and Subsystem #2				
P201	S203 – Active Coal Pile Reclamation				
P201	S204 – Coal Silo Filling and Conveyor Belt Transfer				
P201	S205 – Coal Silo Discharge to Conveyor Belt				
P201	S206 – Coal Crushing and Conveying				
P201	S207 – Coal Conveyor Belt Transfer				
P201	S208 – In-Plant Silo Filling Conveyor Belt Transfer				
P201	S209 – Coal Pile Stack Out				
P201	S212 – Active Coal Pile Storage Area & Handling Activities				
P201	S213 – Inactive Coal Pile Storage Area				
P201	S210 – Coal Crusher Stack Out				
P201	S211 – Coal Conveying				
P301	S303 – Solid Wastes Silo Rotary Unloader Discharge				
P301	S308 – Solid Wastes Hauling to Landfill				
P301	S305 – Solid Wastes Haul Truck Unloading				
P301	S309 – Active/Exposed Landfill Area				
P301	S307 – Waste Landfilling/Reclamation				
P301	S306 – Bottom Ash Excavation and Loading				
P301	S301 – Solid Wastes Silo Filling				
P301	S302 – Solids Vacuum Conveying System and Silo				

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Upset/Emergency Condition Reported During Period?	
		YES	NO	YES	NO
	Filling				
P301	S304 – Fly Ash and Solid Waste Silo Dry Unloading and Haul Truck Loading				
P401	S401 – Scrubber Lime Storage Silo Filling				
P401	S402 – Recycle Ash Storage Silo Filling				
P501	S501 – Unpaved Site Roadways and Parking Lots				
P501	S502 – PRS Soda Ash Storage Silo Filling				
	Cooling System with Pond				
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.

APPENDIX B: Monitoring and Permit Deviation Report - Part II

FACILITY NAME: Platte River Power Authority – Rawhide Energy Station
OPERATING PERMIT NO: 96OPLR142
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 (for Division Use Only)

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

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

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

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

OPERATING PERMIT UNIT IDENTIFICATION:

Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation

Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation

Slurry Line Feed Plugged

Duration

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

Action Taken to Correct the Problem

Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem

Replaced Line Filter

Dates of Upsets/Emergencies Reported (if applicable)

4/10/96 to S. Busch, APCD

Deviation Code (for Division Use Only)

APPENDIX B: Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Platte River Power Authority – Rawhide Energy Station

FACILITY IDENTIFICATION NUMBER: 0690053

PERMIT NUMBER: 96OPLR142

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.54. This signed certification document must be packaged with the documents being submitted.

STATEMENT OF COMPLETENESS

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

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

_____

Printed or Typed Name | Title

_____

Signature | 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
Format for Annual Compliance Certification Reports

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: Platte River Power Authority – Rawhide Energy Station

OPERATING PERMIT NO: 96OPLR 142
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
B001	3,000 mmBtu/hr Combustion Engineering #1930618						
P201	S201 & S202 – Train Unloading Facility						
P201	S203 – Active Coal Pile Reclamation						
P201	S204 – Coal Silo Filling & Conveyor Belt Transfer						
P201	S205 – Coal Silo Discharge to Conveyor Belt						
P201	S206 – Coal Crushing and Conveying						
P201	S207 – Coal Conveyor Belt Transfer						
P201	S208 – In-Plant Silo						

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
	Filling Conveyor Belt Transfer						
P210	S209 – Coal Pile Stackout						
P201	S212 – Active Coal Pile Storage Area & Handling Activities						
P201	S213 – Inactive Coal Storage Area						
P201	S210 – Coal Crusher Stackout						
P201	F211 – Coal Conveying						
P301	S303 – Soli Wastes Silo Rotary Unloader Discharge						
P301	S308 – Solid Wastes Hauling to Landfill						
P301	S305 – Solid Wastes Haul Truck Unloading						
P301	S309 – Active/Exposed Landfill Area						
P301	S307 – Waste Landfilling/Reclamati on						
P301	S306 – Bottom Ash Excavation & Loading						
P301	S301 – Solid Wastes Silo Filling						
P301	S302 – Solids Vacuum Conveying System & Silo Filling						
P301	S304 – Fly Ash & Solid Waste Silo Dry Unloading & Haul Truck Loading						
P401	S401 – Scrubber Slurry Storage Silo Filling						

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
P401	S402 – Recycle Ash Storage Silo Filling						
P501	S501 – Unpaved Site Roadways and Parking Lots						
P501	S502 – PRS Soda Ash Storage Silo Filling						
	Cooling System with Pond						
General Conditions							
Insignificant Activities [4]							

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

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

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

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

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 –⅝⅛ᴺ€¹– 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 Section 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**

Including New Source Performance Standard quarterly reports, Compliance Reports:

Colorado Department of Public Health and Environment
Air Pollution Control Division
Operating Permits Unit
APCD-SS-B1
4300 Cherry Creek Drive S.
Denver, CO 80222-1530

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

Office of Enforcement, Compliance and Environmental Justice
Mail Code 8ENF-T
U.S. Environmental Protection Agency, Region VIII
999 18th Street, Suite 300
Denver, CO 80202

Operational Flexibility (Colorado Regulation No. 3, Part C, XII) and Off Permit Changes:

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

APPENDIX E

Permit Acronyms & Abbreviations

AIRS -	Aerometric Information Retrieval System
AP-42-	EPA Document Compiling Air Pollutant Emission Factors See Appendix I
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
CFR -	Code of Federal Regulations
CO -	Carbon Monoxide
CO_2 -	Carbon Dioxide
COM -	Continuous Opacity Monitor
CRS -	Colorado Revised Statute
dscf -	dry cubic feet at standard conditions
EER -	Excess Emission Report
EF -	Emission Factor
EPA -	Environmental Protection Agency
gr -	grain
HAPs -	Hazardous Air Pollutants
Hr -	hour
lbs -	pounds
LNB -	Low-NOx Burners
MM -	million
NOx -	nitrogen oxides
NESHAP -	National Emission Standards for Hazardous Air Pollutants
NSPS -	New Source Performance Standards
NSR -	New Source Review
O_2 -	Oxygen
OFA -	Overfire Air
Pb -	Lead
PM -	Particulate Matter
PM_{10} -	Particulate Matter smaller than 10 microns
PSD -	Potential for Significant Deterioration
psia -	pounds per square inch, atmospheric
QA -	Quality Assurance
QC -	Quality Control

RACT -	Reasonably Available Control Technology
scf -	cubic feet at standard conditions
SCC -	Source Classification Code
SDA -	Spray Dry Absorber
SIC -	Standard Industrial Code
SO_2 -	sulfur dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compound
Yr -	Year

APPENDIX F
Permit Modifications

DATE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION

APPENDIX G
COAL SAMPLING PLAN ELEMENTS

Note that in lieu of preparing, submitting and implementing a Division approved coal sampling plan, the source may use vendor receipts provided the vendor samples, prepares and analyzes coal in accordance with the requirements described in this section. The source shall retain documentation from the vendor, indicating that coal is sampled, prepared and analyzed in accordance with Division requirements.

The coal sampling plan shall, as a minimum, include details for the following:

1. Describe how each shipment of coal received will be sampled in accordance with the most current ASTM procedure (D2234-89);

2. Include the provision for a proper chain of custody tracking of the sample(s);

3. Required samples be prepared in accordance with the most current ASTM procedure (D2013-86);

4. Require the use of the following test procedures:
   - 4.1. Sulfur content shall be determined in accordance with the most current ASTM procedure (D3177-75 or D4239-85);
   - 4.2. Heating value shall be determined in accordance with the most current ASTM procedure (D2015-77 or D3286-85). The heat content shall be based on the lowest gross heating value of the fuel.
   - 4.3. Ash content shall be determined in accordance with the most current ASTM procedure (D3174-93);

5. A copy of the test results shall be maintained and made available for Division review upon request. The range of values for the sulfur, ash, and heat content for the most recent calendar year shall be included in the annual certification report.

6. Readable, permanent copies of vendor invoices or certificates of quality reporting the coal sulfur and heat content shall be maintained with the copies of the coal sample test results and be made available for Division review upon request; and

7. Identify any other EPA or ASTM methods or procedures that will be utilized.

8. A chain-of-custody procedure shall be defined by the plan.

APPENDIX H
REQUIRED REPORTS

REPORT	Applicable Requirement	DUE DATE(S)
New Source Performance Standards Reports for S101 Boiler	40 CFR Part 60, Subpart Da, 60.49a(b),(c), (d), (e),(f),(g), and (h)	Every calendar quarter, postmarked no later than the 30th day following the end of each calendar quarter
	40 CFR Part 60, Subpart A, 60.7(c.) and (d)	
	40 CFR Part 60, Appendix F - Section 7	
PSD Permit Excess Emissions	PSD Permit	Notify not more than 48 hours after discovery during periods of startup, shutdown, equipment malfunction, or process upset. Provide written information not more than 10 days after discovery (see Condition 1.).
Acid Rain Requirements	Part 75	Quarterly and Annually, as specified in Section III.4 of this permit
Semi-annual Monitoring Report (Also serves to meet the "Prompt Deviation" Reporting requirements)	Part 70 and Colorado Regulation No. 3, Part C	Six months after permit issuance date and every six months thereafter – to be received by the Division by 5:00 p.m. on the due date
Compliance Certification	Part 70 and Regulation No. 3, Part C	One year after permit issuance date and every year thereafter - to be received by the Division by 5:00 p.m. on the due date
Excess Emissions	Section II.E of the Common Provisions	Notify no later than 2 hours after start of next working day
Emergency Conditions	Colorado Regulation No. 3, Part C, VII.	Oral notice no later than noon of the next working day, written notice within one month
APEN	Colorado Regulation No. 3, Part B	See Section V, Condition 22.e of this permit
Off Permit Changes	Colorado Regulation No. 3, Part C, XII.B	Contemporaneous with change
Section 502(b)(10) Changes	Colorado Regulation No. 3, Part C, XII.A	7 days advance notice
Average SO_2 and NOx Emission Rates	Voluntary Emissions Reduction Agreement Paragraph 6	Annually, within 30 days after the end of the first calendar quarter

Appendix I
Rawhide Internal Periodic Monitoring Plan

APPENDIX J
Compliance Assurance Monitoring Plan

I. Background

a. Emission Unit Descriptions:

S101 – Combustion Engineering #1930618 tangentially fired, 3,000 mmBTU/hour, dry bottom steam generator/boiler firing pulverized coal. A baghouse controls PM emissions.

S402 – Recycle Ash Storage Silo Filling. A baghouse controls PM emissions.

b. Applicable Regulations, Emission Limits, Monitoring Requirements

Parameter	Permit Condition Number	Emission Limitations	Monitoring Requirements
PM (S101)	1.1.1 & 1.1.2	0.03 lb/mmBtu	Visible emissions and bag leak detection
PM (S402)	5.4	2.75 tons/year	
PM_{10} (S402)	5.4	0.96 ton/year	Visible emissions and bag leak detection

c. Control Technology

S101 – Boiler: Two (2) twelve compartment baghouses
S402 – Recycle Ash Storage Silo Filling: Baghouse

II. Monitoring Approach

The following monitoring approach will be used for the control device listed in Section 1.c for PM from S101.

	Indicator 1	Indicator 2
I. Indicator	Visible Emissions	Bag Leak Detection
Measurement Approach	Visible emissions from the baghouses are continuously monitored.	A broken bag particulate monitor continuously detects and measures releases of particulate matter in the discharge air system.
II. Indicator Range	An excursion is identified as an opacity reading of 5% or greater. Excursions require the source to investigate the baghouse performance and make any repairs or adjustments necessary. A record of any repairs shall be maintained and made available upon request. A deviation is defined as failure to monitor opacity. Deviations trigger corrective action and reporting.	An excursion is defined as a sustained discharge greater than 80% of full scale readings. An excursion will alarm and annunciate to the operator a malfunction. Personnel will investigate to determine why baghouse performance is compromised and make any necessary adjustments. The permittee shall maintain a record of repairs or adjustments made, the personnel involved, date and time. A deviation is identified as failure to monitor the release of PM. Deviations trigger an inspection, corrective action and a reporting.
III. Performance Criteria		
a. Data Representativeness	Opacity measurements greater than 5% under normal operating conditions are an indication of an increase in particulate matter emissions.	Leak detection indicates bag condition and estimate remaining bag life.

	Indicator 1	Indicator 2
b. QA/QC Practices and Criteria	COM shall be maintained and operated in accordance with the requirements of this permit.	System installed, calibrated, operated and maintained according to manufacturer's recommendations and good operating practices. Such procedures shall be in written form, available for Division inspection upon request.
c. Monitoring Frequency	Continuously	Continuously

The following monitoring approach will be used for the control device listed in Section 1.c for PM/PM_{10} from S402.

	Indicator 1
I. Indicator	Bag Leak Detection
Measurement Approach	A broken bag detection system shall monitor changes in the dust level of the dust collector exhaust to warn when a bag filter is failing before emissions become visible.
II. Indicator Range	An excursion is defined as 10% opacity or greater. An excursion will alarm and annunciate to the operator a malfunction. Personnel will investigate to determine why baghouse performance is compromised and make any necessary adjustments. The permittee shall maintain a record of repairs or adjustments made, the personnel involved, date and time. A deviation is identified as failure to monitor the release of PM. Deviations trigger an inspection, corrective action and a reporting.

	Indicator 1
a. Data Representativeness	Leak detection indicates bag condition and estimate remaining bag life.
b. QA/QC Practices and Criteria	System installed, calibrated, operated and maintained according to manufacturer's recommendations and good engineering practices. Such procedures shall be in writing, available for Division inspection upon request.
c. Monitoring Frequency	Continuously

III. Justification

a. Background:
This facility produces electricity.

Rational for Selection of Performance Indicators:

Bag leak detection is an indicator of bag filter condition and remaining life.

b. Rational for Selection of Indicator Ranges:

The Triboguard © sensitivity of 80% of full scale is set in accordance with the recommendations in the "Fabric Filter Bag Leak Detection Guidance" (September, 1997). The 10% opacity threshold was selected based on opacity readings observed in the past when broken bags were experienced.