Colorado Department of Public Health and Environment

OPERATING PERMIT

Kerr-McGee Rocky Mountain Corporation

Ft. Lupton Compressor Station

Issued: October 1, 1998

Last Revised: July 3, 2002

AIR POLLUTION CONTROL DIVISION
COLORADO OPERATING PERMIT

FACILITY NAME:	Ft. Lupton Compressor Station	OPERATING PERMIT NUMBER
FACILITY ID:	1230057	**95OPWE013**
ISSUE DATE:	October 1, 1998	
EXPIRATION DATE:	October 1, 2003	
MODIFICATIONS:	See Appendix F of Permit	

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

ISSUED TO:	PLANT SITE LOCATION:
Kerr-McGee Rocky Mountain Corporation	**16116 Weld County Road 22**
1999 Broadway, Suite 3600	**Ft. Lupton, CO 80621**
Denver, CO 80202	Weld County

INFORMATION RELIED UPON

Operating Permit Application Received: January 1, 1995

And Additional Information Received: January 1, February 27, March 31, June 19, and August 16, 1995; March 3, 1998; February 2, 2000; October 29, 2001

Nature of Business	Natural Gas Compression
Primary SIC:	4922

RESPONSIBLE OFFICIAL		FACILITY CONTACT PERSON	
Name	Dale Cantwell	Name:	Patrick Flynn
Title:	Vice President - DJ District	Title:	Director, Environmental, Health and Safety
Phone:	(303) 296-3600	Phone:	(303) 296-3600 X418

SUBMITTAL DEADLINES

Semi-Annual Monitoring Period:	April - September, October - March
Semi-Annual Monitoring Report:	May 1, 2001 & November 1, 2000 and subsequent years
Annual Compliance Period:	Begins April 1 to March 31
Annual Compliance Certification:	May 1, 2001 and subsequent years

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SECTION I - General Activities and Summary

1. Permitted Activities

1.1 This facility consists of 7 natural gas fired reciprocating compressor engines used to compress and transmit gas from the gas field to sales pipelines, one triethylene glycol dehydrator to remove water from the natural gas and an incinerator to dispose of nonhazardous combustibles contaminated with oil. In addition, fugitive VOC emissions for equipment leaks are above permit de minimis levels and therefore are included in the Operating Permit.

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

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

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

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

11WE730-1 thru 3	Formerly issued to KN Wattenberg Transmission LLC	96WE641	Formerly issued to KN Wattenberg Transmission LLC
11WE132	"	97WE0406	"
94WE760-4	"	97WE0180	HS Resources, Inc.

1.4 All information gathered pursuant to the requirements of this permit is subject to the Record keeping and Reporting requirements listed under Condition 21 of the General Conditions in Section IV of this permit. All conditions in this permit are enforceable by US Environmental Protection Agency, Colorado Air Pollution Control Division (hereinafter Division) and its agents, and citizens unless otherwise specified. **State-only enforceable conditions are:**

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

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

2. Alternative Operating Scenarios

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

2.1.1 In the event of a compressor engine breakdown or periodic maintenance which requires the use of a temporary replacement engine (defined as in service for 3 months or less) the temporary replacement engine must meet either of the following conditions:

2.1.1.1. A replacement engine that has a valid construction permit, has demonstrated compliance with the construction permit conditions, and has emission limits which are equal to or lower than the NO_x, CO and VOC limits set forth in the Operating Permit may be used as a temporary replacement engine. A log shall be maintained to record the dates any replacement engines were in use as well as the associated construction permit number.

2.1.1.2. An onsite grandfathered engine or an engine brought in from out-of-state or a newly-purchased engine that does not have a Colorado Construction permit may be used as a temporary replacement engine. In either case, emission measurements of NO_x, CO and VOC from the engine shall be conducted using a portable flue gas analyzer within 48 hours. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the tests shall be compared to the emission limits or the emission factor for the original engine to determine enforceable compliance or noncompliance. For comparison with an annual emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in a year in order to demonstrate compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in a year (8760). If the engine that is replaced is grandfathered or permit exempt and the test results show an exceedance of the emission factor, then the source must use the emission factor determined by the test results to calculate emissions for the purposes of payment of fees for the period the replacement engine is operated. An exceedance of the emission limitations for any pollutant during the initial portable analyzer analysis shall require a portable analyzer analysis indicating compliance with the annual limits within 10 days of the

initial analysis. Calibration of the analyzer, following an analysis that indicates an exceedance, shall be conducted using calibration gases. If portable analyzer results fail to indicate compliance with the emission limitations within the 10 day period, the source will be considered out of compliance from the time that the replacement engine came on line until the engine is taken off line. If portable analyzer results indicate compliance with the emission limitations within the 10 day period, the source will be considered to be in compliance from the time that the replacement engine came on line until the engine is taken off line.

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

2.2 The facility must contemporaneously with making a change from one operating scenario to another, maintain records at the facility of the scenario under which it is operating. These records must be made available to the Division upon request (Colorado Regulation No. 3, Part A, Section IV.A.1).

3. Prevention of Significant Deterioration (PSD)

3.1 This facility is located in an area designated attainment for all pollutants. It is categorized as a major stationary source (Potential to Emit > 250 tons/year). Future modifications at this facility resulting in a significant net emissions increase (see Regulation No. 3, Part A, Section I.B.37 and 58) for any pollutant as listed in Regulation No. 3, Part A, Section I.B.58 or a modification which is major by itself will result in the application of the PSD review requirements.

4. Accidental Release Prevention Program (112(r)

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

5. Summary of Emission Units

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

Emission Unit Number	AIRS Stack Number	Facility Identifier	Description	Pollution Control Device
EU31	S002	EU31	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 250451. Natural Gas Fired.	Non-Selective Catalytic Convertor
EU32	S003	EU32	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine, Rated at 954 HP (Maximum), Serial No. 288792 Natural Gas Fired.	Non-Selective Catalytic Convertor
EU34	S001	EU34	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 288358. Natural Gas Fired.	Non-Selective Catalytic Convertor
EU33	S006	EU33	Fairbanks Morse, Model No. 384S8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-30S1S12. Natural Gas Fired.	Uncontrolled
EU35	S007	EU35	Fairbanks Morse, Model No. 38D8750-45S1S, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 1859 HP, Serial No. 38DS8 MEP-10. Natural Gas Fired.	Uncontrolled
EU36	S004	EU36	Fairbanks Morse, Model No. 38DS8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-24S1S12. Natural Gas Fired.	Uncontrolled
EU37	S005	EU037	Fairbanks Morse, Model No. 38D8780-28S1S, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-28S1S12. Natural Gas Fired.	Uncontrolled
EU04	S010	EU04	Smith, Model No. Unavailable, Triethylene Glycol Dehydration Unit, Rated at 30 MMscf/day, Serial No. 79-148.	Uncontrolled
I001	S014	I001	Elastec Inc., Smart Ash Energy Recovery Unit, Model 100, Serial No. Unavailable.	Uncontrolled
F001	S011	F001	Fugitive VOC Emissions from Equipment Leaks	Uncontrolled

SECTION II - Specific Permit Terms

1. EU031, EU032, EU034 - Three (3) Waukesha, L-7401 ICEs (954 HP each)

Limits are per engine

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
NOx	1.1	23.0 tons/yr	0.69 lb/MMBtu	Record keeping, Calculation	Monthly
CO		50.6 tons/yr	1.52 lb/MMBtu		
VOC		9.2 tons/yr	0.275 lb/MMBtu		
Fuel Use	1.2	73.54 MMscf/yr		Fuel Meter and Record keeping	Monthly
Hours of Operation	1.3			Record keeping	Monthly
Opacity	1.4	Less Than or Equal to 20%		Fuel Restriction	Annually
Portable Monitoring	1.5	NOx ≤ 23.0 tons/yr CO ≤ 50.6 tons/yr		Portable Flue Gas Analyzer	Quarterly
Performance Test	1.6	NOx ≤ 23.0 tons/yr CO ≤ 50.6 tons/yr		EPA Reference Method	One Time
Catalyst Parameters	1.7	Manufacturer's Specifications		Record keeping	Monthly
Btu Content of Natural Gas	1.8			Record keeping and Calculations	Semi-Annually

1.1 Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compounds emissions shall not exceed the limitations stated above for each engine (Construction Permit #97WE0180).

1.1.1 Monthly emissions of each pollutant shall be calculated for each engine using the listed compliance emission factors (EF), monthly fuel consumption , and the latest BTU calculation from Condition 1.8 in the following equation:

lb/month = (EF) X (Monthly Fuel Use in MMscf) X (Heat Content of Fuel in MMBtu/MMscf)

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

1.2 Fuel consumption for each engine shall not exceed the limitations stated above (Construction Permit #97WE0180)

1.2.1 Fuel use for this engine shall be measured and recorded each month. Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix G of this permit. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

1.3 Hours of operation for each engine shall be monitored and recorded monthly for use in fuel allocation.

1.4 Opacity from each engine shall not exceed 20% as stated in Regulation No. 1, Section II, A. Natural gas shall be burned to monitor compliance with the opacity standard.

1.5 Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of each engine. For comparison with an annual or short term emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

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

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

If portable flue gas analyzer results fail to indicate the compliance of the engine with either the NO_x or CO emission limitations within the 14 day period, the source will notify the Division in writing within 10 calendar days of the end of the 14 day period. Results of all testing that indicates noncompliance shall be submitted to the Division within 10 calendar days of the end of the 14 day period. The source will be required to conduct EPA Reference Test Methods (identified as Reference Method 7E and Reference Method 10, or Reference Method 19 (40 CFR Part 60 Appendix A), hereinafter "EPA Reference Test Methods") or other test methods or procedures acceptable to the Division within 45 calendar days of the end of the 14 day period

allowed for the portable flue gas analyzer testing. The Division shall be notified at least 30 calendar days prior to the EPA Reference Test date, so that it may choose whether to observe the testing.

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

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

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

1.6 For an initial demonstration of compliance with the permit limits, compliance tests for the engines shall be conducted to measure the emission rate(s) for nitrogen oxides, carbon monoxide and oxygen using EPA approved methods or other methods approved by the Division. Any stack tests conducted to show compliance with a monthly or annual emission limit shall have the results projected to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time.

The compliance testing shall be completed and copies of the results provided to the Division within 180 calendar days of the issuance of this operating permit. A copy of the engine test results shall be provided to the Division within 60 calendar days of the completion of the tests. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No test shall be conducted without prior approval from the Division.

1.7 The pressure and exhaust gas temperature differences across the catalyst and engine air to fuel ratio will be monitored and recorded monthly to assess engine and non-selective catalytic reduction system operating condition. During those months when portable monitoring is scheduled these parameters are to be monitored and recorded during the portable monitoring event.

1.8 Samples of fuel gas shall be collected and analyzed to determine C_1 through C_{6+} composition. The lower heating value of the fuel shall be calculated semi-annually using the results of the analysis and published heats of combustion (on the basis that combustion occurs with products and reactants in the vapor state) in terms of Btu/scf at 60 EF and 14.696 psia in the following equation:

$$LHVBtu/scf = \frac{\sum_i (C_i mol\%)(Hc_i Btu/scf)}{100}$$

where:

Ci = Concentration of Component i mol%

Hc_i = Heat of Combustion (vapor state of reactants) in Btu/scf @ 60 °F & 14.696 psia

Calculation of monthly emissions required under Condition 1.1.1 shall be made using the calculated lower heating value based on the most recent required analysis in Condition 4.2.

1.9 These engines and non-selective catalytic reduction systems shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

2. EU33, EU36 and EU37 - Fairbanks Morse MEP-12 ICEs (2166 HP each)

Limits are per engine

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	2.1		4.22 tons/yr	0.056 lb/MMBtu	Record keeping and Calculation	Monthly
PM_{10}			4.22 tons/yr	0.056 lb/MMBtu		
NOx		55.0 lbs/hr	104.5 tons/yr	1.36 lb/MMBtu		
CO			50.2 tons/yr	0.65 lb/MMBtu		
VOC			20.9 tons/yr	0.27 lb/MMBtu		
Fuel Use	2.2		179.0 MMscf/yr		Fuel Meter	Monthly
Hours of Operation	2.3				Record keeping	Monthly
Opacity	2.4	Less Than or Equal to 20%			Fuel Restriction	Annually
Portable Monitoring	2.5	NOx ≤ 55.0 lbs/hr CO ≤ 50.2 tons/yr			Portable Flue Gas Analyzer	Quarterly
Performance Test	2.6	NOx ≤ 55.0 lbs/hr CO ≤ 50.2 tons/yr			EPA Reference Method	One Time
Btu Content of Natural Gas	2.7				Record keeping and Calculations	Semi-Annually

2.1 Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compounds emissions shall not exceed the limitations stated above for each engine (Construction Permits #11WE730 (1-3)).

2.1.1 Monthly emissions of each pollutant shall be calculated for each engine using the listed compliance emission factors (EF), monthly fuel consumption , and the latest BTU gas analysis from Condition 2.7 in the following equation:

lb/month = (EF) X (Monthly Fuel Use in MMscf) X (Heat Content of Fuel in MMBtu/MMscf)

2.1.2 A twelve month rolling total shall be maintained for each engine for demonstration of compliance with the annual limitations. Each month a new

twelve month total shall be calculated using the previous twelve months data. Emissions shall be calculated by the end of each subsequent month.

2.1.3 Compliance with the hourly emission limit for each engine shall be demonstrated by dividing the monthly calculated emissions by the number of run-time hours in the previous month to obtain an hourly average.

2.2 Fuel consumption for each engine shall not exceed the limitations stated above (Construction Permits #11WE730(1-3))

2.2.1 Fuel use for this engine shall be measured and recorded each month. Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix G of this permit. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

2.3 Hours of operation for each engine shall be monitored and recorded monthly for use in determining average hourly emissions and fuel allocation calculations.

2.4 Opacity from each engine shall not exceed 20% as stated in Regulation No. 1, Section II, A. Natural gas shall be burned to monitor compliance with the opacity standard.

2.5 Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of each engine. For comparison with an annual or short term emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

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

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

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

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

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

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

2.6 For an initial demonstration of compliance with the permit limits, compliance tests for the engines shall be conducted to measure the emission rate(s) for nitrogen oxides, carbon monoxide and oxygen using EPA approved methods or other methods approved by the Division. Any stack tests conducted to show compliance with a monthly or annual emission limit shall have the results projected to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time.

The compliance testing shall be completed and copies of the results provided to the Division within 180 calendar days of the issuance of this operating permit. A copy of the engine test results shall be provided to the Division within 60 calendar days of the completion of the tests. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No test shall be conducted without prior approval from the Division.

2.7 Samples of fuel gas shall be collected and analyzed to determine C_1 through C_{6+} composition. The lower heating value of the fuel shall be calculated semi-annually using the results of the analysis and published heats of combustion (on the basis that combustion occurs with products and reactants in the vapor state) in terms of Btu/scf at 60 EF and 14.696 psia in the following equation:

$$LHVBtu/scf = \frac{\sum_i (C_i mol\%)(Hc_i Btu/scf)}{100}$$

where:

Ci = Concentration of Component i mol%

Hc_i = Heat of Combustion (vapor state of reactants) in Btu/scf @ 60 °F & 14.696 psia

Calculation of monthly emissions required under Condition 2.2.1shall be made using the calculated lower heating value based on the most recent required analysis in Condition 4.2.

2.8 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

3. EU35 -Fairbanks Morse 45S1S Internal Combustion Engine (1859 HP)

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
PM	3.1	3.61 tons/yr	0.055 lb/MMBtu	Record keeping and Calculation	Monthly
PM_{10}		3.61 tons/yr	0.055 lb/MMBtu		
NOx		80.5 tons/yr	1.23 lb/MMBtu		
CO		46.5 tons/yr	0.71 lb/MMBtu		
VOC		17.9 tons/yr	0.27 lb/MMBtu		
Fuel Use	3.2	144.5 MMscf/yr		Fuel Meter and Record keeping	Monthly
Hours of Operation	3.3			Record keeping	Monthly
Opacity	3.4	Less Than or Equal to 20%		Fuel Restriction	Annually
Portable Monitoring	3.5	NOx $\leq$ 80.5 tons/yr CO $\leq$ 46.5 tons/yr		Portable Flue Gas Analyzer	Quarterly
Performance Test	3.6	NOx $\leq$ 80.5 tons/yr CO $\leq$ 46.5 tons/yr		EPA Reference Method	One Time
Btu Content of Natural Gas	3.7			Record keeping and Calculation	Semi-Annually

3.1 Particulate Matter, Particulate Matter less than 10 microns, Nitrogen Oxide, Carbon Monoxide and Volatile Organic Compounds emissions shall not exceed the limitations stated above (Construction Permits #11WE132).

3.1.1 Monthly emissions of each pollutant shall be calculated for this engine using the listed compliance emission factors (EF), monthly fuel consumption , and the latest BTU gas analysis from Condition 3.7 in the following equation:

lb/month = (EF) X (Monthly Fuel Use in MMscf) X (Heat Content of Fuel in MMBtu/MMscf)

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

3.2 Fuel consumption for this engine shall not exceed the limitations stated above (Construction Permits #11WE132)

3.2.1 Fuel use for this engine shall be measured and recorded each month.Within the first seven days of every month, the fuel meter shall be read and recorded. Allocation of fuel use shall be made using the methods detailed in Appendix G of this permit. The fuel use shall be measured no more than one (1) hour from the time that run time hours have been recorded. A twelve month rolling total shall be maintained for demonstration of compliance with the annual limitations. Each month a new twelve month total shall be calculated using the previous twelve months data.

3.3 Hours of operation for this engine shall be monitored and recorded monthly for use in determining fuel use allocation.

3.4 Opacity from this engine shall not exceed 20% as stated in Regulation No. 1, Section II, A. Natural gas shall be burned to monitor compliance with the opacity standard.

3.5 Emission measurements of nitrogen oxides (NO_x) and carbon monoxide (CO) from each engine shall be conducted quarterly using a portable flue gas analyzer. Calibration of the analyzer shall be conducted according to manufacturer's instructions. Results of the portable flue gas analyzer tests shall be used to monitor the compliance status of each engine. For comparison with an annual or short term emissions limit, the results of the tests shall be converted to a lb/hr basis and multiplied by the allowable operating hours in the month or year (whichever applies) in order to monitor compliance. If a source is not limited in its hours of operation the test results will be multiplied by the maximum number of hours in the month or year (8760), whichever applies.

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

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

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

calendar days prior to the EPA Reference Test date, so that it may choose whether to observe the testing.

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

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

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

3.6 For an initial demonstration of compliance with the permit limits, compliance tests for the engines shall be conducted to measure the emission rate(s) for nitrogen oxides, carbon monoxide and oxygen using EPA approved methods or other methods approved by the Division. Any stack tests conducted to show compliance with a monthly or annual emission limit shall have the results projected to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time.

The compliance testing shall be completed and copies of the results provided to the Division within 180 calendar days of the issuance of this operating permit. A copy of the engine test results shall be provided to the Division within 60 calendar days of the completion of the tests. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No test shall be conducted without prior approval from the Division.

3.7 Samples of fuel gas shall be collected and analyzed to determine C_1 through C_{6+} composition. The lower heating value of the fuel shall be calculated semi-annually using the results of the analysis and published heats of combustion (on the basis that combustion occurs with products and reactants in the vapor state) in terms of Btu/scf at 60 EF and 14.696 psia in the following equation:

$$LHV Btu/scf = \frac{\sum_i (C_i mol\%)(Hc_i Btu/scf)}{100}$$

where:

Ci = Concentration of Component i mol%

Hc_i = Heat of Combustion (vapor state of reactants) in Btu/scf @ 60 °F & 14.696 psia

Calculation of monthly emissions required under Condition 3.1.1shall be made using the calculated lower heating value based on the most recent required analysis in Condition 4.2.

3.8 These engines shall be operated and maintained in accordance with internal operating and maintenance standards, which shall consider manufacturer's recommendations and industry standard practices, at all times, including periods of start-up, shutdown, and malfunction. Such internal operating and maintenance standards shall be kept on site and made available to the Division upon request.

4. EU04 - Smith Triethylene Glycol Dehydration Unit

Parameter	Permit Condition Number	Limitations	Compliance Emission Factor	Monitoring	
				Method	Interval
VOC	4.1	146.5 tons/yr	Based on GRI GlyCalc Model	Parametric	Daily
Extended Gas Analysis	4.2			EPA Reference Methods	Quarterly (To Annually)
Performance Test	4.3	VOC ≤ 146.5 tons/yr		Division Approved Protocol	One Time
Natural Gas Processed	4.4	9,125 MMscf/yr		Flow Meter	Monthly

4.1 Volatile Organic Compound emissions shall not exceed the limitations stated above (Worst Case Dehydrator Emission Data Submitted to the Division on January 1, 1995). The glycol dehydration unit shall be considered to be operating in compliance with the hourly emission limit if all of the following conditions are met:

Parameter	Value	Units	Criteria
Inlet (Wet) Gas Temperature	60	degrees Fahrenheit	Above
Glycol Circulation Rate	4.0	gallons per minute	Below
Benzene Content of Gas	130	parts per million	Below
Toluene Content of Gas	95	parts per million	Below
Ethyl Benzene Content of Gas	15	parts per million	Below
Xylene Content of Gas	30	parts per million	Below

The triethylene glycol circulation rate and inlet (wet) gas temperature for this unit shall be measured and recorded daily. The average value for each of these parameters shall be determined for any month during which a daily recorded parameter fails the stipulated passing criteria compared to the values listed in the table above. If the average glycol circulation rate or inlet gas temperature do not meet the stipulated passing criteria, the GRI GlyCalc (Version 2.0 or higher) model shall be run to determine daily and monthly emission rates. Inputs to the model will be the recorded average values for inlet temperature, glycol circulation rate, gas data from the most recent required analysis (see below), calculated daily inlet gas throughput required by Condition 4.4 and the following assumed value of 720 psia for inlet gas pressure.

The circumstances surrounding any day on which the required parameters fail to be measured and recorded shall be described in a log to be maintained on-site. Data from the last day for

which data exists may be substituted for missing data in the event the calculation of a monthly-average value is required.

If a GlyCalc run is required for any reason for a given month, the tons per month of emissions predicted by the model shall be used in a rolling 12-month total for VOC emissions to determine compliance with the annual limit. The 12-month total shall be assumed to be equal to the annual limit for any 12-month period for which no GLYCalc runs were triggered and for any period for which a GLYCalc run was triggered but the results of the run predict compliance with the hourly VOC limit. If the source chooses, the 12-month rolling total may be based on actual emissions, provided GLYCalc was run, using the average daily parameters as required by condition 4.1, for each month. Records of actual annual emission calculations shall be maintained and made available to the Division upon request. The calculation of the 12-month total shall be performed for any month a GlyCalc run is triggered if the results of the run fail to predict compliance with the VOC limit. If the 12-month total exceeds the annual limit, emissions for the previous months must be calculated with GlyCalc using the parameters described in above until the rolling 12-month total is in compliance with the annual limitation.

4.2 Samples of inlet gas shall be collected and analyzed (extended gas analysis) to determine C_1 to C_6, n-hexane, benzene, toluene, ethyl benzene and total xylene (BTEX) composition once per quarter. A GlyCalc model run will be conducted using the previous months data if any of the concentrations for BTEX listed in the table above are exceeded. Frequency of extended gas analyses shall move to semi-annually after the first year, then to annually after the second year if BTEX concentrations remain consistently below the established values. Frequency will revert back to quarterly if any of the BTEX constituents exceed the listed values.

4.3 For an initial demonstration of compliance with the permit limits, compliance test for the dehydrator shall be conducted to measure the emission rate for volatile organic compounds using EPA approved methods or other methods approved by the Division. Any stack tests conducted to show compliance with a monthly or annual emission limit shall have the results projected to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time.

The compliance testing shall be completed and copies of the results provided to the Division within 180 calendar days of the issuance of this operating permit. A copy of the stack test results shall be provided to the Division within 60 calendar days of the completion of the tests. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No test shall be conducted without prior approval from the Division.

4.4 The cubic feet of gas processed by this dehydration unit shall not exceed the limitations stated above (Colorado Construction Permit 94WE760-4). The gas throughput to the dehydration unit shall be recorded monthly using existing flow meters. A twelve month rolling total will be maintained to verify compliance with annual throughput limitations.

5. I001 - Elastec Inc., Smart Ash Energy Recovery Unit

Parameter	Permit Condition Number	Limitations		Compliance Emission Factor	Monitoring	
		Short Term	Long Term		Method	Interval
PM	5.1		0.084 tons/yr	1.4 lbs/ton waste	Record keeping and Calculation	Monthly
PM10			0.062 tons/yr	1.04 lbs/ton waste		
SO2			0.09 tons/yr	1.5 lbs/ton waste		
NO2			0.6 tons/yr	10.0 lbs/ton waste		
Charge Limit	5.2	120 lbs/hr	120 tons/yr		Record keeping	Per Charge
Flash Point of Waste	5.3	Greater than or Equal to 100 EF			Waste Restriction	Per Charge
Particulates	5.4	0.10 gr/dscf corrected at 12% CO_2			Demonstrated Compliance with Conditions 5.2, 5.3 and 5.6	See Condition 5.4
Waste Burning Restrictions	5.5	No Burning of Radioactive or Hazardous Waste			Self Certification	Annually
Opacity	5.6	Less Than or Equal to 20%			EPA Reference Method 9	Annually
Personnel Requirements	5.7	Trained Personnel Operating Incinerator			Record keeping	Per Charge

5.1 Emissions of air pollutants shall not exceed the limitations above (Colorado Construction Permit 97WE0406 as modified directly by this Operating Permit modification). Emissions from this unit shall be calculated monthly and a twelve month rolling total to comply with the annual limits using the equations below:

tons/month = [EF (lbs/ton waste) x waste burned (tons/month) x 1/2000 (ton/lbs)]

5.2 The charge weight of the incinerator shall not exceed the limitations above (Colorado Construction Permit 97WE0406 as modified directly by this Operating Permit modification). Compliance with this requirement shall be demonstrated by monitoring and recording the weight of each charge into the incinerator. These records shall be made available to the Division upon request.

5.3 The flash point of materials being burned shall be higher than or equal to 100 degrees F (Colorado Construction Permit 97WE0406). Compliance with this requirement shall be

demonstrated by monitoring and recording the materials being burned in each charge. Absorbent materials that contain volatile liquids, such as gasoline or paint thinner shall not be burned in this unit. These records shall be made available to the Division upon request.

In addition, liquid fuel shall not be used as start-up fuel (Colorado Construction Permit 97WE0406). An ample layer of dry paper or cardboard material supplies a fast, easy initial fuel source for start-up.

5.4 Particulate emissions shall not exceed 0.1 grains per dry standard cubic feet, corrected to 12% CO_2 (Colorado Construction Permit 97WE0406). Demonstrated compliance with Conditions 5.2, 5.3, and 5.6 shall be adequate to ensure compliance with this particulate emission limit.

5.5 No radioactive or hazardous waste may be burned in the incinerator without obtaining the appropriate permits (Colorado Construction Permit 97WE0406). Compliance with this requirement will be demonstrated by certifying annually that no radioactive or hazardous waste was burned.

5.6 Opacity of emission shall not exceed 20% (Colorado Construction Permit 97WE0406). Compliance with this requirement shall be demonstrated by conducting visual emission observations, in accordance with EPA Reference Method 9, annually. Results of Method 9 readings and a copy of the certified Method 9 reader's certification shall also be kept on site and made available to the Division upon request.

5.7 The incinerator must be operated by trained personnel (Colorado Construction Permit 97WE0406). Compliance with this requirement will be demonstrated by maintaining records of personnel trained to operate the incinerator. The name of the personnel operating the incinerator will be recorded for each charge of waste fed to the incinerator. These records shall be made available to the Division upon request.

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

6. F001 - Fugitive VOC Emissions From Equipment Leaks

Parameter	Permit Condition Number	Limitation	Compliance Emission Factor	Monitoring	
				Method	Interval
VOC	6.1	30.8 tons/yr	By Component Type - EPA's Protocol for Equipment Leaks	Record keeping	As Noted

6.1 VOC emissions from equipment leaks shall not exceed the limitations stated above (Colorado Construction Permit 96WE641). Emissions shall be calculated using the emission factors and equations listed below:

Emission Factors for individual types of components in lbs/component-hr (Protocol for Equipment Leak Emission Estimates, EPA-453/R-95-017).

Connectors = 0.00044
Flanges = 0.000858
Open-ended Line = 0.0044
*Other = 0.01936
Pump = 0.00528
Valve = 0.0099
* This "other" equipment type should be applied for any equipment type other than connectors, flanges, open-ended lines, pumps or valves.

Emissions of VOC per component:

No. of Components x EF (lbs/component-hr) x 8760 hrs/yr x VOC content of gas

6.1.1 The most recent gas analysis as required under Conditions 4.2 of this Permit shall be used to determine the appropriate % VOC to use in the above equation.

6.1.2 A component count shall be conducted within 90 days of the issuance of this permit and every five (5) years thereafter to verify existing components and inventory.

6.1.3 A running total shall be kept of all additions and subtractions to the component count. The most recent count shall be used for emission calculations and compliance purposes.

SECTION III - Permit Shield

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

1. Specific Conditions

The following parameters and requirements have been specifically identified as non-applicable to the facility to which this permit has been issued This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance.

Emission Unit Description & Number	Applicable Requirement	Justification
Facility	40 CFR 60, Subpart KKK, Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants (Colorado Regulation No. 6, Part B, Subpart KKK)	There is no existing natural gas liquid extraction unit located at the Ft. Lupton facility. Any liquids recovered on-site are done through gravimetric separation processes typical of inlet gas separation implemented at most compressor stations.

2. General Conditions

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

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

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

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

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

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

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

3. Streamlined Conditions

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

Permit Condition	Streamlined (Subsumed) Requirements
	NOT APPLICABLE

SECTION IV - General Permit Conditions

1. Administrative Changes

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

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

2. Certification Requirements

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

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

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

c. Compliance certifications shall contain:

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

(ii) the compliance status of the source;

(iii) whether compliance was continuous or intermittent;

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

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

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

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

3. Compliance Requirements

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

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

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

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

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

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

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

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

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

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

4. Emergency Provisions

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

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

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

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

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

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

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

This emergency provision is also in addition to the Upset Conditions and Breakdowns provision set forth in the Common Provisions, Section II.E, which states that upset conditions shall not be deemed to be in violation of the Colorado regulations, provided the Division is notified as soon as possible, but not later than two (2) hours after the start of the next working day, followed by a written notice 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.

5. Emission Standards for Asbestos

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

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

6. Emissions Trading, Marketable Permits, Economic Incentives

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

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

7. Fee Payment

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

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

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

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

8. Fugitive Particulate Emissions

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

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

9. Inspection and Entry

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

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

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

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

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

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

10. Minor Permit Modifications

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

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

11. New Source Review

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

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

12. No Property Rights Conveyed

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

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

13. Odor

Regulation No. 2, 5 CCR 1001-3

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

14. Off-Permit Changes to the Source

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

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

15. Opacity

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

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

16. Open Burning

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

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

17. Ozone Depleting Compounds

Regulation No. 15, 5 CCR 1001-17

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

18. Permit Expiration and Renewal

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

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

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

19. Portable Sources

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

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

20. Prompt Deviation Reporting

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

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

21. Record Keeping and Reporting Requirements

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

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

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

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

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

(iv) the analytical techniques or methods used;

(v) the results of such analysis; and

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

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

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

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

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

22. Reopenings for Cause

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

a. The Air Pollution Control Division shall reopen, revise, and reissue Operating Permits; permit reopenings and reissuance shall be processed using the procedures set forth in Regulation No. 3,

Part C, § III., except that proceedings to reopen and reissue permits affect only those parts of the permit for which cause to reopen exists.

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

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

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

23. Section 502(b)(10) Changes

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

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

24. Severability Clause

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

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

25. Significant Permit Modifications

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

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

26. Special Provisions Concerning the Acid Rain Program

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

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

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

27. Transfer or Assignment of Ownership

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

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

28. Volatile Organic Compounds

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

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

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

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

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

29. Wood Stoves and Wood burning Appliances

Regulation No. 4, 5 CCR 1001-6

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

END OF PERMIT REQUIREMENTS

OPERATING PERMIT APPENDICES

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

***DISCLAIMER:**

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

APPENDIX A - Inspection Information

Directions to Plant:

This facility is near the town of Ft. Lupton, located at 16116 Weld County Road 22.

Safety Equipment Required:

Hard Hat, Safety Shoes, Hearing Protection, Eye Protection and Flame Resistant Clothing

Facility Plot Plan:

Figure 1 (following page) shows the plot plan as submitted on December 30, 1994 with the source's Title V Operating Permit Application.

List of Insignificant Activities::

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

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

Methanol storage tank, 8800 gal
Two (2) glycol storage tanks, 5200 & 5876 gal
Three (3) antifreeze storage tanks, 2x1000 & 517 gal
Mineral spirits storage tank, 517 gal
Five (5) condensate storage tanks, all 8300 gal
Used engine oil storage, 1030 gal
New engine oil storage, 9450 gal
Condensate storage groundwater sump
Condensate overflow and vent tank
Dehydrator Unit, Natural gas-fired heater, 750,000 Btu/hr

APPENDIX B

Monitoring and Permit Deviation Reporting

with codes ver 9/1/00

Reporting Requirements and Definitions

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

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

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

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

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

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

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

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

For purposes of this operating permit, monitoring means any condition determined by observation, by data from any monitoring protocol, or by any other monitoring which is required by the permit as well as the recordkeeping associated with that monitoring. This would include,

for example, fuel use or process rate monitoring, fuel analyses, and operational or control device parameter monitoring.

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

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

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

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

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

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

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

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

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

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

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

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

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

- The identification of each term or condition of the permit that is the basis of the certification;

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

- Such other facts as the Division may require, consistent with the applicable requirements to which the source is subject, to determine the compliance status of the source.

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

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

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

Startup, Shutdown, Malfunctions, Emergencies, and Upsets

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

Startup, Shutdown, and Malfunctions

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

Emergencies and Upsets

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

Definitions

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

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

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

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

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: Kerr-McGee RMC – Ft. Lupton Compressor Station
OPERATING PERMIT NO: 95OPWE013
REPORTING PERIOD: _____ (see first page of the permit for specific reporting period and dates)

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
EU31	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 250451. Natural Gas Fired.					
EU32	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine, Rated at 954 HP (Maximum), Serial No. 288792 Natural Gas Fired.					
EU34	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 288358. Natural Gas Fired.					
EU33	Fairbanks Morse, Model No. 384S8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-30S1S12. Natural Gas Fired.					
EU35	Fairbanks Morse, Model No. 38D8750-45S1S, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 1859 HP, Serial No. 38DS8 MEP-10. Natural Gas Fired.					
EU36	Fairbanks Morse, Model No. 38DS8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-24S1S12. Natural Gas Fired.					
EU37	Fairbanks Morse, Model No. 38D8780-28S1S, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-28S1S12. Natural Gas Fired.					
EU04	Smith, Model No. Unavailable, Triethylene Glycol Dehydration Unit, Rated at 30 MMscf/day, Serial No. 79-148.					

Operating Permit Unit ID	Unit Description	Deviations noted During Period?[1]		Deviation Code [2]	Upset/Emergency Condition Reported During Period?	
		YES	NO		YES	NO
I001	Elastec Inc., Smart Ash Energy Recovery Unit, Model 100, Serial No. Unavailable.					
F001	Fugitive VOC Emissions from Equipment Leaks					
General Conditions						
Insignificant Activities						

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

[2] Use the following entries, as appropriate:

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

Monitoring and Permit Deviation Report - Part II

FACILITY NAME: [Company Name] - [Facility Name]
OPERATING PERMIT NO: [Permit #
REPORTING PERIOD: _____

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

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

OPERATING PERMIT UNIT IDENTIFICATION:

Operating Permit Condition Number Citation

Explanation of Period of Deviation

Duration (start/stop date & time)

Action Taken to Correct the Problem

Measures Taken to Prevent a Reoccurrence of the Problem

Dates of Upsets/Emergencies Reported (if applicable)

Deviation Code: _____ Division Code QA: _____

SEE EXAMPLE ON THE NEXT PAGE

EXAMPLE

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

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

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

OPERATING PERMIT UNIT IDENTIFICATION:
Asphalt Plant with a Scrubber for Particulate Control - Unit XXX

Operating Permit Condition Number Citation
Section II, Condition 3.1 - Opacity Limitation

Explanation of Period of Deviation
Slurry Line Feed Plugged

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

Action Taken to Correct the Problem
Line Blown Out

Measures Taken to Prevent Reoccurrence of the Problem
Replaced Line Filter

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

Deviation Code: _____ Division Code QA: _____

Monitoring and Permit Deviation Report - Part III

REPORT CERTIFICATION

SOURCE NAME: Kerr-McGee RMC – Ft. Lupton Compressor Station

FACILITY IDENTIFICATION NUMBER: 1230057

PERMIT NUMBER: 95OPWE013

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

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

STATEMENT OF COMPLETENESS

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

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

_____

Printed or Typed Name Title

_____

Signature of Responsible Official Date Signed

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

APPENDIX C
Required Format for Annual Compliance Certification Report

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

FACILITY NAME: Kerr-McGee RMC – Ft Lupton Compressor Station
OPERATING PERMIT NO: 95OPWE013
REPORTING PERIOD: _____

I. Facility Status

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

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

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	Yes	No	Continuous	Intermittent	Yes	No
EU31	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 250451. Natural Gas Fired.								
EU32	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine, Rated at 954 HP (Maximum), Serial No. 288792 Natural Gas Fired.								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	Yes	No	Continuous	Intermittent	Yes	No
EU34	Waukesha, Model L-7042, 4-Cycle Rich Burn, Internal Combustion Engine , Rated at 954 HP (Maximum), Serial No. 288358. Natural Gas Fired.								
EU33	Fairbanks Morse, Model No. 384S8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-30S1S12. Natural Gas Fired.								
EU35	Fairbanks Morse, Model No. 38D8750-45S1S, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 1859 HP, Serial No. 38DS8 MEP-10. Natural Gas Fired.								
EU36	Fairbanks Morse, Model No. 38DS8MEP-12, 2-Cycle Lean Burn, Internal Combustion Engine, Site Rated at 2166 HP, Serial No. 38D8780-24S1S12. Natural Gas Fired.								
EU37	Fairbanks Morse, Model No. 38D8780-28S1S, 2-Cycle Lean Burn, Internal Combustion Engine,Site Rated at 2166 HP, Serial No. 38D8780-28S1S12. Natural Gas Fired.								

Operating Permit Unit ID	Unit Description	Deviations Reported [1]		Monitoring Method per Permit?[2]		Was compliance continuous or intermittent?[3]		Was Data Continuous?[4]	
		Previous	Current	Yes	No	Continuous	Intermittent	Yes	No
EU04	Smith, Model No. Unavailable, Triethylene Glycol Dehydration Unit, Rated at 30 mmSCF/day, Serial No. 79-148.								
I001	Elastec Inc., Smart Ash Energy Recovery Unit, Model 100, Serial No. Unavailable.								
F001	Fugitive VOC Emissions from Equipment Leaks								
General Conditions [5]									
Insignificant Activities [5]									

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

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

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

March 2000
The Periodic Monitoring requirements of the Operating Permit program rule are intended to provide assurance that even in the absence of a continuous system of monitoring the Title V source can demonstrate whether it has operated in continuous compliance for the duration of the reporting period. Therefore, if a source 1) conducts all of the monitoring and record keeping required in its permit, even if such activities are done periodically and not continuously, and if 2) such monitoring and record keeping does not indicate non-compliance, and if 3) the Responsible Official is not aware of any credible evidence that indicates non-compliance, then the Responsible Official can certify that the emission point(s) in question were in continuous compliance during the applicable time period.

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

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

II. Status for Accidental Release Prevention Program:

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

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

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

III.. Certification

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

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

_____

Printed or Typed Name Title

_____

Signature Date Signed

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

APPENDIX D

Notification Addresses

1. **Air Pollution Control Division**

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

ATTN: Jim King

2. **United States Environmental Protection Agency**

Compliance Notifications:

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

Permit Modifications, Off Permit Changes:

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

APPENDIX E

Permit Acronyms

Listed Alphabetically:

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

PSD -	Prevention of Significant Deterioration
PTE -	Potential To Emit
RACT -	Reasonably Available Control Technology
SCC -	Source Classification Code
SCF -	Standard Cubic Feet
SIC -	Standard Industrial Classification
SO_2 -	Sulfur Dioxide
TPY -	Tons Per Year
TSP -	Total Suspended Particulate
VOC -	Volatile Organic Compounds

APPENDIX F

Permit Modifications

DATE OF REVISION	TYPE OF REVISION	SECTION NUMBER, CONDITION NUMBER	DESCRIPTION OF REVISION
March 21, 2000	Administrative Amendment	Cover Sheet	Change of Ownership; Change of Responsible Official; Change of Facility Contact Person; Change submittal date for semi-annual reports and certification submittal.
		Section II Item 3, EU35-Fairbanks Morse 45S1S 1859 HP IC Engine Table	Correct typographical error for carbon monoxide limits. Limits corrected to identify limit as 46.5 tons per year and not 17.9 tons per year as previously shown.
		Appendix B Appendix C	Update formats and information to current standard version
October 20, 2000	Minor Modification	Section II, Conditions 1.4, 2.4 and 3.4	Update language to current version
		Section II, Conditions 1.5, 2.5 and 3.5	Update portable monitoring language to current version
		Section II Item 3, EU35-Fairbanks Morse 45S1S 1859 HP IC Engine Table	Correct typographical error for volatile organic compound limit. Limits corrected to identify limit as 17.9 tons per year and 9.2 tons per year as previously shown.
		Section II, Item 5, I001-Elastec Inc., Smart Ash Energy Recovery Unit Table	Increase charge limits to 120 pounds per hour and 120 tons per year. Increase PM limit to 0.084 tons per year. Increase PM_{10} limit to 0.062 tons per year. Increase SO_2 limit to 0.09 tons per year. Increase NO_2 limit to 0.6 tons per year.
		Section II, Item 5, Condition 5.1 Condition 5.2	Modify wording to identify change in Construction Permit 97WE0406 conditions being made directly in this Operating Permit modification.
		Appendix B Appendix C	Update formats and information to current standard version
July 3, 2002	Administrative Amendment	Document	Corporate name change

APPENDIX G

Fuel Allocation Calculation

Required Method for Fuel Consumption Allocation

***The methods outlined will be used if each unit doesn't have an individual fuel meter to calculate fuel use from Internal Combustion Engines EU31-EU37**

FUEL ALLOCATION TO INDIVIDUAL ENGINES

$$\text{Allocated Fuel Consumption} = \frac{[\text{Design Heat Rate}][\text{Hrs. of Operation}][\text{Site Rated Horsepower}]}{[\text{Sum of Numerator for Each Engine}]} \times [\text{Facility Fuel Use for Month}]$$

Unit Number	Site Rated Horsepower
EU31	954
EU32	954
EU34	954
EU33	2166
EU35	1859
EU36	2166
EU37	2166