TECHNICAL REVIEW DOCUMENT
For
RENEWAL OF OPERATING PERMIT 96OPMR177

Young Gas Storage Company, Ltd. – Young Compressor Station
Morgan County
Source ID 0870051

Prepared by Jacqueline Joyce
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Revised February and April 2006

I. Purpose

This document will establish the basis for decisions made regarding the applicable requirements, emission factors, monitoring plan and compliance status of emission units covered by the renewed operating permit proposed for this site. The original Operating Permit was issued May 1, 1999. The expiration date for the permit was May 1, 2004. However, since a timely and complete renewal application was submitted, under Colorado Regulation No. 3, Part C, Section IV.C all of the terms and conditions of the existing permit shall not expire until the renewal operating permit is issued and any previously extended permit shield continues in full force and operation. This document is designed for reference during the review of the proposed permit by the EPA, the public, and other interested parties. The conclusions made in this report are based on information provided in the renewal application submitted April 17, 2003, additional information received on July 30, 2001, comments on the draft permit and technical review document received on March 6, 2006, previous inspection reports and various e-mail correspondence, as well as telephone conversations with the applicant. Please note that copies of the Technical Review Document for the original permit and any Technical Review Documents associated with subsequent modifications of the original Operating Permit may be found in the Division files as well as on the Division website at http://www.cdphe.state.co.us/ap/Titlev.html.

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

II. Description of Source

This facility is a natural gas storage facility as defined under Standard Industrial Classification 4922. The facility consists of three (3) natural gas-fired reciprocating internal combustion engines, a triethylene glycol dehydrator, and a facility flare. The reciprocating engines are used to drive compressors, which compress pipeline quality natural gas for injection into underground storage during off-peak delivery periods or for delivery to pipeline during periods of peak demand. Upon withdrawal, natural gas may be dehydrated by the dehydration unit and/or processed to remove natural gas liquids. The natural gas liquid product is collected, stored in tanks and transported offsite via trucks. The facility flare is used to combust the vent gases from the dehydration unit flash tank and still vent, fuel gas from the pilot light, and natural gas/natural gas liquid vapors from the emergency vent. Vent gases can be routed to the regenerator burner, reducing the burner's natural gas fuel consumption. The facility emits fugitive VOC emissions from equipment leaks.

Based on the information available to the Division and provided by the applicant, it appears that no modifications have been made to the compressor engines identified in the current Title V permit.

The facility is located approximately 3.5 miles north of Interstate 76 on County Road 17 in Morgan County. The area in which the plant operates is designated as attainment for all criteria pollutants.

There are no affected states within 50 miles of the plant. There are no Federal Class I designated areas within 100 kilometers of the plant.

<u>Condensate Storage Tanks and Condensate Loading Equipment</u>

Revisions were made to Colorado Regulation No. 3, regarding condensate storage tanks and condensate truck loading equipment and those revisions took effect on December 30, 2002. Previously, under Regulation No. 3, certain size condensate storage tanks and condensate truck loading equipment meeting a specified throughput limit were exempt from APEN reporting and permitting requirements and were considered insignificant activities for Title V operating permit purposes. With the revisions to Colorado Regulation No. 3, only condensate storage tanks and condensate truck loading equipment at exploration and production (E & P) sites, meeting specified throughput limits are APEN exempt and insignificant activities. In their response to comments on the draft permit and technical review document, the source indicated that the condensate tanks are pressurized and the truck loading is vapor balanced. Therefore emissions from the condensate tanks and condensate loading are below the APEN de minimis level and can remain in the insignificant activity list in Appendix A.

MACT Requirements

Natural Gas Transmission and Storage (NGTS) Facilities MACT (40 CFR Part 63 Subpart HHH)

The source submitted an initial notification on June 19, 2000 indicating that they were a major source of hazardous air pollutant (HAP) emissions based on maximum engine hours of operation (8760 hrs/yr) and that based on actual hours of operation, they were an area source. Since the engines are used during both the injection and withdrawal phases, the Division considers and EPA concurs that maximum hours of engine operation must be used to determine major source status (see attached). Therefore, the glycol dehydrator is subject to the NGTS MACT provisions and the appropriate requirements will be included in the permit.

Case-by-Case MACT - 112(j) (40 CFR Part 63 Subpart B §§ 63.50 thru 63.56)

Under the federal Clean Air Act (the Act), EPA is charged with promulgating maximum achievable control technology (MACT) standards for major sources of hazardous air pollutants (HAPs) in various source categories by certain dates. Section 112(j) of the Act requires that permitting authorities develop a case-by-case MACT for any major sources of HAPs in source categories for which EPA failed to promulgate a MACT standard by May 15, 2002. These provisions are commonly referred to as the “MACT hammer”.

Owner or operators that could reasonably determine that they are a major source of HAPs which includes one or more stationary sources included in the source category or subcategory for which the EPA failed to promulgate a MACT standard by the section 112(j) deadline were required to submit a Part 1 application to revise the operating permit by May 15, 2002. Based on the information provided by this source, the Young facility is a major source of HAPs (i.e. facility-wide potential to emit of greater than 10 tons per year of any single HAP or greater than 25 tons per year of all HAPs combined) for a covered source category (reciprocating internal combustion engines (RICE) and industrial, commercial and institutional boilers and process heaters and organic liquid distribution) and did submit a Part 1 application to the Division prior to May 15, 2002. Since the EPA has signed off on final rules for all of the source categories, which were not promulgated by the deadline, the case-by-case MACT provisions in 112(j) no longer apply.

RICE MACT (40 CFR Part 63 Subpart ZZZZ)

The final rule for RICE was published in the Federal Register on June 15, 2004. The engines in the current Title V permit are 4-cycle low NO_X engines. In accordance with the provisions in 40 CFR Part 63 Subpart ZZZZ § 63.6590(b)(3), existing (commenced construction or reconstruction prior to December 19, 2002) 4-stroke lean burn engines do not have to meet the requirements in 40 CFR Part 63 Subparts A and ZZZZ, including the initial notification requirements. The Division considers that the low NO_X

engines meet the definition of lean burn engines in 40 CFR Part 63 Subpart ZZZZ § 63.6675. In addition, emergency generators are included in the insignificant activity list in the current Title V permit. In accordance with the provisions in 40 CFR Part 63 Subpart ZZZZ § 63.6590(b)(2), existing emergency RICE do not have to meet the requirements in 40 CFR Part 63 Subparts A and ZZZZ, including the initial notification requirements.

Industrial, Commercial and Institutional Boilers and Process Heaters MACT (40 CFR Part 63 Subpart DDDDD)

The final rule for industrial, commercial and institutional boilers and process heaters was published in the Federal Register on September 13, 2004. The insignificant activity list in the current Title V permit identifies a couple of process heaters that are potentially subject to the MACT requirements. The provisions in 40 CFR Part 63 Subpart DDDDD (§ 63.7506(c)(3)) exempt existing (constructed before January 13, 2003) small gaseous fired units ($\leq$ 10 mmBtu/hr) from the requirements in 40 CFR Part 63 Subparts A and DDDDD, including the initial notification requirements. Therefore, the industrial, commercial and institutional boilers and process heaters MACT requirements do not apply to the equipment at this facility.

Organic Liquid Distribution (Non-Gasoline) MACT (40 CFR Part 63 Subpart EEEE)

Under 40 CFR Part 63 Subpart EEE §§ 63.2334(c)(1) and (2), organic liquid distribution operations do not include activities and equipment at NGTS facilities; therefore, the organic liquid distribution MACT requirements do not apply.

Compliance Assurance Monitoring (CAM) Requirements

CAM applies to any emission unit that is subject to an emission limitation, uses a control device to achieve compliance with that emission limitation and has potential pre-control emissions greater than major source levels. None of the engines addressed in the current Title V permit are equipped with control devices; therefore, CAM does not apply to any of the equipment included in the current Title V permit.

The facility has a flare to combust emissions from the glycol dehydrator flash tank and regenerator (still) vent, as well as to combust emissions from the emergency vent. Therefore, the fare is considered a control device for the glycol dehydrator. Based on the GLYCalc runs used to set the emission limitations, uncontrolled VOC emissions from the dehydrator exceed the major source level (734 tons/yr of VOC). The renewal application did not address whether or not CAM applied to any emission units at the facility. The current operating permit requires that a device that detects the presence of a flame be installed and maintained. Flares that are subject to the NGTS Facilities MACT are required to detect the presence of a flame and are subject to the requirements in § 63.11(b). Therefore, since the current Title V permit includes monitoring that is similar to the NGTS MACT, the Division considers that the glycol

dehydrator is exempt from CAM because the Title V operating permit specified a continuous compliance determination method (40 CFR Part 64 § 64.2(b)(vi)).

Note that the provisions in § 63.11(b) include additional requirements for flares, which include performance test requirements and visible emission requirements. Although the Division is exempting the flare from the CAM requirements, we believe that sufficient periodic monitoring was not provided for an emission unit that is using a control device to both avoid PSD review and to be exempt from the control requirements in the NGTS MACT. Therefore, as discussed later in the document, additional monitoring and testing requirements will be included for the flare.

The summary of emissions that was presented in the Technical Review Document (TRD) for the original Title V permit issuance has been modified to more appropriately identify the HAP potential to emit (PTE) at the facility as follows:

Emission Unit	Potential to Emit (tons/yr)			
	NO_X	CO	VOC	HAPS
Engine – CG-7100	29	36.7	19.4	See Table on Page 14
Engine – CG-7200	29	36.7	19.4	
Engine – CG-7300	29	36.7	19.4	
Dehy/Flare	7.1	38.3	38.8	
Total	94.1	148.4	97	38.3

The criteria pollutant PTE is based on permitted emissions. Even though actual emissions are typically much less than permitted emissions, the source usually reports permitted emissions as actual emissions, which is an acceptable practice; therefore actual emissions are not shown in the above table.

The breakdown of HAP emissions by emission unit and individual HAP is provided on page 14 of this document. As indicated in the footnotes for the table on page 14, the HAP PTE was determined as follows: for the engines in the current Title V permit it is based on design rate, permitted annual hours of operation (or 8760 hrs/yr) and the most conservative emission factor from AP-42 or HAPCalc 2.0 and for the dehydrator it is based on the GLYCalc runs used to set permitted emissions. Note that in their comments on the draft permit and technical review document, received on March 6, 2005, the source indicated that fugitive VOC emissions from equipment leaks were below APEN de minimis and should be considered an insignificant activity.

III. Discussion of Modifications Made

Source Requested Modifications

The source submitted their renewal application on April 17, 2003. In addition, prior to the submittal of the renewal application, the source submitted a request for a change to the Responsible Official on July 30, 2001.

The above requests were addressed as follows:

Page following cover page

CIG requested in their July 30, 2001 submittal that a primary and secondary Responsible Official be identified in the permit for more flexibility in completing the required certifications. The Division will grant this request. However, Young Gas Storage Company should be aware that whichever Responsible Official signs the documents, that person becomes the responsible party regarding any non-compliance situation related to the Operating Permit and is subject to both civil and criminal penalties that may be associated with non-compliance situations. In addition, the permit contact was changed.

Section II, Condition 1.3

In their renewal application, the source requested that the requirement to determine the Btu content of the fuel be revised to the language in the operating permit for CIG's Cheyenne Station. The change will be made as requested.

Section II, Condition 2.2.1

In their renewal application, the source requested that the criteria in the guidance table be revised to state "At or Above" and "At or Below". The change will be made as requested.

Section II, Condition 2.2.2

In their renewal application, the source requested that the requirement to conduct extended gas analyses no less than two months apart be revised to require that samples be conducted no less than one month apart so that 2 samples may be taken during the same withdrawal season and still comply with the sampling requirements. The change will be made as requested.

Section II, Condition 2.7

In their renewal application, the source requested that the opacity monitoring requirement in Condition 2.7 be revised to utilize Method 22 rather than Method 9. The source indicated that Method 22 is more consistent with visible emission observations required by 40 CFR Part 63 § 63.11(b)(4). The Division will revise this section to address the opacity monitoring and require that Method 22 be utilized instead of Method 9. Note that as discussed further in this document, the Division considers that in the issuance of the construction permit and the original Title V permit, the Division inadvertently omitted several applicable requirements for the flare and they will be included in the renewal permit.

Section II, Condition 3.2

In their renewal application, the source is requesting that the provisions in 40 CFR Part 60 Subpart KKK be removed from the permit. The renewal application indicates that the facility does not fractionate natural gas liquids during its operations. The Division received a determination from EPA regarding the applicability of NSPS KKK to natural gas storage facilities (see attached). EPA indicated that if the facility in question stores natural gas that has already been processed (i.e. natural gas liquids extracted) then the facility does not meet the definition of a natural gas processing plant, even if natural gas liquids are extracted upon withdrawal. The source did not indicate whether or not all of the gas injected into storage has been processed. In addition, although the source indicated that natural gas liquids are not fractionated at this facility, the original Title V permit application includes a flow diagram that indicates the facility is equipped a "deethanizer". This piece of equipment seems to imply that some fractionation is taking place at the facility. In their response to comments (received on March 6, 2006), the source indicated that the purpose of the deethanizer is not be make a specification product (i.e. ethane) but rather to remove the light ends entrained in the liquids when condensed. The source further indicated that all of the natural gas stored at the facility is pipeline quality natural gas that has been processed prior to entering the facility. Therefore the Division agrees that the facility is similar not a natural gas processing plant based on EPA's applicability determination for a similar facility.

In addition, in the source's comments (received March 6, 2006), the source demonstrated that actual, uncontrolled fugitive VOC emissions from equipment leaks are below the APEN de minimis level (2 tons/yr) and requested that fugitive VOC emissions be removed from Section II of the permit and included in the insignificant activity list. The Division has made the change as requested.

Other Modifications

In addition to the modifications requested by the source, the Division has included changes to make the permit more consistent with recently issued permits, include comments made by EPA on other Operating Permits, as well as correct errors or omissions identified during inspections and/or discrepancies identified during review of this renewal.

The Division has made the following revisions, based on recent internal permit processing decisions and EPA comments, to the Young Renewal Operating Permit with the source's requested modifications. These changes are as follows:

Page following Cover Page

- The citation (above "issued to" and "plant site location") on the page following the cover page provides the incorrect title for the state act. The title will be changed

from “Colorado Air Quality Control Act” to “Colorado Air Pollution Prevention and Control Act”. In addition, the dates were removed from the citation.

- Clarified dates for monitoring and compliance periods, i.e. changed “January - June” to “January 1 – June 30".

  It should be noted that the monitoring and compliance periods and report and certification due dates are shown as examples. The appropriate monitoring and compliance periods and report and certification due dates will be filled in after permit issuance and will be based on permit issuance date. Note that the source may request to keep the same monitoring and compliance periods and report and certification due dates as were provided in the original permit. However, it should be noted that with this option, depending on the permit issuance date, the first monitoring period and compliance period may be short (i.e. less than 6 months and less than 1 year).

- Added language specifying that the semi-annual reports and compliance certifications are due in the Division’s office and that postmarks cannot be used for purposes of determining the timely receipt of such reports/certifications.

<u>General</u>

- The Reg 3 citations were revised throughout the permit, as necessary, based on the recent revisions made to Reg 3.

<u>Section I – General Activities and Summary</u>

- Conditions 13 and 17 in Condition 1.4 were renumbered to 14 and 18 and Condition 21 in Condition 1.5 was renumbered to 22. The renumbering changes were necessary due to the addition of the Common Provisions requirements in the General Conditions of the permit.

- In Condition 1.4 General Condition 3.g (last paragraph), Common Provisions, Affirmative Defense, was added as a State-only requirement.

- The alternative operating scenario (AOS) language (temporary and permanent engine replacement) was revised to the latest version. Note that in the current permit, the permanent engine AOS language references a “Table 1” listing approved replacement engines, but no such table has been provided. The Division considers that in order to provide the permanent engine replacement AOS, the permittee must identify specific engines that may be used for permanent replacement so that they may be evaluated. Since no specific engines appear to be identified the Division will allow for only a like-kind replacement (i.e. same model, size, etc.).

  Note that the facility is a major source for HAP emissions. Since no specific information was ever provided for which engines would be used as permanent

replacement engines, the Division considers that any like-kind replacement engine would be considered new and subject to the RICE MACT requirements upon startup.

- Minor language changes were made to Condition 3.1 to more appropriately reflect the status of the source with respect to PSD.

- Based on comments made by EPA on another operating permit, the phrase "Based on the information provided by the applicant" was added to the beginning of Condition 4.1 (112(r)).

- Removed Condition 4.2 (submit RMP). Based on information available to the Division the RMP was submitted for the facility by the specified deadline.

- Removed condition 4.3 (112(r) certification) since the annual compliance certification has language regarding 112(r).

- Added a "new" Section 5 for compliance assurance monitoring (CAM), note that no emission units are subject to CAM.

<u>Section II.1 – Internal Combustion Engines</u>

- The portable monitoring language (Condition 1.1) was updated to the current language, which requires that the portable monitoring conducted verify the emission factors in the permit.

- Revised the language in Condition 1.1 (for calculating emissions) based on changes to the portable monitoring language. In addition, revised the equation to calculate emissions in "tons/mo" rather than "lbs/mo".

- Added language to Condition 1.2 (fuel use) to indicate that fuel use is determined with each engine's individual fuel meter.

- Under "monitoring method" in the Table for Condition 1.3 (Btu content) "as defined below" was replaced with the following phrase "ASTM methods or in-line gas chromatograph".

- The language specifying the 20% opacity requirement (Condition 1.4) was rewritten to more closely resemble the language in Regulation No. 1.

- In the Table for Conditions 1.4 placed "Fuel Restriction" under "Monitoring Method" and under "Monitoring Interval" added "only natural gas is used as fuel".

- Based on EPA's response to a petition on another Title V operating permit, minor language changes were made to Conditions 1.1, 1.2 and 1.4 (both in the table and the text for 1.2 and 1.4) to clarify that only natural gas is used as fuel in these engines.

- Added “credible” before “evidence” in Condition 1.4 to reflect EPA approved language.

Note that no condition is included for the 30% opacity standard, which is applicable during certain operating activities. The specific activities under which the 30% opacity standard applies are: building a new fire, cleaning of fire boxes, soot blowing, startup, any process modification, or adjustment or occasional cleaning of control equipment. Based on engineering judgment the Division considers that building a new fire, cleaning of fire boxes and soot-blowing does not apply to the operation of internal combustion engines. In addition, these engines do not have control devices, so adjustment or occasional cleaning of control devices do not apply to these engines. Process modifications and startup may apply to engines, however, based on engineering judgment, the Division believes that such activities would be unlikely to occur for longer than six minutes. Therefore, the 30% opacity requirement has not been included in the operating permit.

Section II.2 – Dehy and Flare

- Revised the equation in Condition 2.1 to calculate emissions in “tons/mo” rather than “lbs/mo” and specified the origin of the emission factors.

- Condition 2.2.1 specifies that an average value only be calculated for the inlet gas temperature, however, since several parameters are recorded daily, the Division considers that averages should be calculated for all parameters and any of those averages should trigger a GLYCalc run if they do not meet the comparison criteria.

- The current permit allows for the frequency of extended gas analyses to be relaxed if the BTEX constituents remain consistently below the levels provided in the table in Condition 2.2.1. According to the Division’s July 9, 2004 inspection report, the frequency of the extended gas analyses is set at annual. Therefore, the permit will be revised to state that the frequency of extended gas analyses is annual. The permit will also contain provisions to increase the frequency of analyses if the BTEX levels indicated in the table in Condition 2.2.1 are exceeded and specifies that the frequency will increase based on when the sample was taken.

- The following changes were made to the table under Condition 2.2: under “compliance emission factor” replaced “as defined below” with “see Condition 2.2”, under “monitoring – method” replaced “EPA reference methods” with “ASTM Methods” and under “monitoring – interval” replaced “as defined below” with “daily, annually”.

- Condition 2.2.3 was revised to incorporate both Conditions 2.2.3 and 2.2.4 since these are two alternative methods to calculate VOC emissions from the glycol dehydrator. Revised Condition 2.2.3 to specify that GLYCalc version 4.0 or higher is to be used in any GLYCalc runs and to allow the average parameter

value to be used in any required GLYCalc run. The current permit specifies that the exceeded parameter be used in the GLYCalc run; however, since a GLYCalc run is not triggered unless the average exceeds the parameter, the Division considers that it is more appropriate to use the average in any GLYCalc run. Corrected the emission factors in Condition 2.2.4 to reflect that these are in units of lbs/hr, rather than in units of lbs/day. Equations were added to both Conditions 2.2.3 and 2.2.4 and language was added specifying the origin of any emission factors. The Division also included language to make it clear when GLYCalc runs are required.

- Minor language changes were made to Condition 2.3 and formatting changes were made to Condition 2.4 to clarify the specific requirements.

- Added a condition ("new" Condition 2.6) to require that emissions from the glycol dehydrator regenerator (still) vent and flash tank be routed to the flare prior to being emitted or routed to the regenerator burner for use as fuel. The original Tltle V permit application indicated that emissions from the dehydrator were either controlled by the flare or routed to the reboiler for use as fuel. Although the table in Section I, Condition 5.1 indicated that emissions from the dehydrator were controlled by the flare or regenerator (reboiler) burner, only the flare was addressed in Section II.2 of the permit.

- The original construction permit and subsequently the issued Title V operating permit failed to include certain requirements that apply to the flare and sufficient monitoring for synthetic minor status. These requirements are being added as discussed below:

    - The original Title V permit included the 20% opacity requirements in Colorado Regulation No. 1, Section II.A.1, however, the opacity requirement that applies to the flare in specified in Regulation No. 1, Section II.A.6 (opacity for smokeless flares).

    - The flare is used to control emissions from the glycol dehydrator, without this control device VOC emissions from the flare would exceed the major stationary source level; therefore the flare is used to avoid PSD review. In addition, with the flare, actual emissions of benzene are less than 1 ton per year; therefore, the flare is used to avoid control requirements and subsequent monitoring and recordkeeping requirements under the NGTS MACT. The control efficiency of the flare is specified at 95%, but neither the construction permit nor the original Title V permit required any sort of performance test. To that end, the Division believes that it is appropriate to add more specific requirements on the flare since more stringent requirements should have been included due to the synthetic minor source status of the flare permit.

      The control efficiency of the flare is presumed to be 95%. For units subject to the NGTS MACT, which is based on 95% control, sources with flares must

meet the requirement in § 63.11(b). Therefore, the Division presumes that flares meeting the requirements in § 63.11(b) are at least 95% efficient. For that reason, the Division considers that it is appropriate to include the substantive requirements of § 63.11(b) in the permit for the flare, since neither the construction permit nor the original Title V permit included a performance test requirement.

It should be noted that there are cases where alternative requirements apply, the Division has made some assumptions and included provisions we consider appropriate. The Division will give the source an opportunity to choose more appropriate alternatives during the pre-public comment review period. The source indicated in their comments received on March 6, 2006 indicated that the flare is an air-assisted flare. The requirements included in the draft permit are consistent with the requirements in 63.11(b) for air-assisted flared.

- The initial notification submitted for the NGTS MACT did not specify how the source would comply with the MACT requirements, nor did it indicate that the facility would become a synthetic minor source for HAP emissions. The Division assumes that the source is meeting the NGTS MACT requirements by keeping actual benzene emissions below 1 ton/yr and as such the facility is exempt from the control monitoring requirements and recordkeeping and reporting requirements as specified in 40 CFR Part 63 Subpart HHH § 63.1274(d)(2); however, the procedures specified in § 63.1282(a)(2) must be used to determine actual emissions and records of such determinations must be maintain as required by § 63.1284(d). These provisions will be included in the renewal permit.

<u>Section III – Permit Shield</u>

- The citation in the permit shield was corrected. The reference to Part C, Section XIII was changed to Part C, Section XIII.B and references to Part C, Section VI.C.1.b and C.R.S. § 25-7-111(2)(i) were removed.

- The title for Section 1 was changed from “Specific Conditions” to “Specific Non-Applicable Requirements” and a new section 3 was added for subsumed (streamlined) conditions. Note that no conditions have been streamlined.

- Based on comments made by EPA on another permit, the following phrase was added to the beginning of the introductory sentence in Section 1 “Based upon the information available to the Division and supplied by the applicant”.

- Based on comments made by EPA on another permit, the following statements were added after the introductory sentence in Section 1 “This shield does not protect the source from any violations that occurred prior to or at the time of permit issuance. In addition, this shield does not protect the source from any

violations that occur as a result of any modification or reconstruction on which construction commenced prior to permit issuance".

Section IV - General Conditions

- Added an "and" between the Reg 3 and C.R.S. citations in General Condition 3 (compliance requirements).

- Added language from the Common Provisions (new condition 3). With this change the reference to "21.d" in Condition 20 (prompt deviation reporting) will be changed to "22.d", since the general conditions are renumbered with the addition of the Common Provisions.

- The citation in General Condition 7 (fees) was changed to cite the Colorado Revised Statue. In addition, any specific identification of a fee (i.e. $100 APEN fee) or citation of Reg 3 was removed and replaced with the language "…in accordance with the provisions of C.R.S. [appropriate citation]."

- The citation in General Condition 13 (odor) was corrected. In addition, the phrase "Part A" was added to the citation for Condition 13 (odor). Colorado Regulation No. 2 was revised and a Part B was added to address swine operations. Colorado Regulation No. 2, Part B should not be included as a general condition in the operating permit.

- The citation in General Condition 16 (open burning) was revised. The open burning requirements are no longer in Reg 1 but are in new Reg 9. In addition, changed the reference in the text from "Reg 1" to "Reg 9".

- Added the requirements in Colorado Regulation No. 7, Section V.B (disposal of volatile organic compounds) to General Condition 28.

Appendices

- First Page of Appendices – The phrase "except as otherwise provided in the permit" was added after the word "enforceable" in the disclaimer at the request of EPA.

- Appendix B and C were replaced with revised Appendices.

- The EPA addresses in Appendix D were corrected.

HAPS per Division Analysis

Unit	HAP Emissions (tons/yr)									
	acetaldehyde	acrolein	benzene	toluene	ethyl benzene	xylene	formaldehyde	n-hexane	methanol	**total**
CG-7100	5.49E-01	3.86E-01	1.00E-01	5.19E-01		2.70E-02	4.44E-00	7.29E-02	1.64E-01	6.26E-00
CG-7200	5.49E-01	3.86E-01	1.00E-01	5.19E-01		2.70E-02	4.44E-00	7.29E-02	1.64E-01	6.26E-00
CG-7300	5.49E-01	3.86E-01	1.00E-01	5.19E-01		2.70E-02	4.44E-00	7.29E-02	1.64E-01	6.26E-00
Dehy / Flare			3.75E-00	6.78E-00	3.78E-00	5.00E-00		1.60E-01		1.95E+01
Total	1.65E-00	1.16E-00	4.05E-00	8.34E-00	3.78E-00	5.08E-00	1.33E+01	3.81E-01	4.92E-01	3.83E+01

Engine emissions are based on most conservative emission factor (from AP-42 and HAPCalc 2.0, for 4-cycle rich burn engines and/or 4-cycle lean/clean burn) for each pollutant
Dehy emissions from GLYCalc run used to set permit limits.