TECHNICAL REVIEW DOCUMENT
for
OPERATING PERMIT 95OPWE062

to be issued to:

Duke Energy Field Services, Inc
Kersey/Mewbourn Gas Processing Plant
Weld County
Source ID 1230090

Prepared by Michael E. Jensen
April 26, 1999

I. PURPOSE:

This document establishes the basis for decisions made regarding the Applicable Requirements, Emission Factors, Monitoring Plan and Compliance Status of Emission Units covered within the Operating Permit proposed for this site. It is designed for reference during review of the proposed permit by the EPA and during Public Comment. This narrative is intended only as an adjunct for the reviewer and has no legal standing. Conclusions in this document are based on information provided in the original application submittal of April 3, 1995, and the supplemental Title V technical information submittals of December 8, 1995, March 3, April 16 and October 31, 1997, as well as numerous technical information submittals needed for the preparation of the construction permit, as well as numerous telephone contacts with the applicant.

On April 16, 1998, the Colorado Air Quality Control Commission directed the Division to implement new procedures regarding the use of short term emission and production/throughput limits on Construction Permits. These procedures are being directly implemented in all Operating Permits that had not started their Public Comment period as of April 16, 1998. All short term emission and production/throughput limits that appeared in the Construction Permits associated with this facility that are not required by a specific State or Federal standard or by the above referenced Division procedures have been deleted and all annual emission and production/throughput limits converted to a rolling twelve (12) month total. Note that, if applicable, appropriate modeling to demonstrate compliance with the National Ambient Air Quality Standards was conducted as part of the Construction Permit processing procedures. If required by this permit, portable monitoring results and/or EPA reference test method results will be multiplied by 8760 hours for comparison to annual emission limits unless there is a specific condition in the permit restricting the hours of operation.

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

revisions, 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. Source Description:

This plant is classified as a natural gas processing plant as set forth under Standard Industrial Classification 1321. Natural gas is delivered to the plant by pipeline. After condensate is removed from the gas by the inlet scrubbers, the inlet gas is subsequently compressed to processing pressures. The inlet gas is then chilled by the propane refrigerant to remove a natural gas liquid (NGL) product from the stream. The close loop refrigeration process also acts to stabilize the NGL product. The gas plant consists of two (2) gas processing skids, identified as Plant A and Plant B, to separate ethane, propane, and heavier NGL products from the incoming natural gas stream. All NGL products are transported off-site by pipeline.

The site consists of thirteen (13) engines powering natural gas compressors, two (2) natural gas processing skids, one triethylene glycol (TEG) dehydration system, one ethylene glycol (EG) natural gas dehydration, a 10 MMBtu/hr hot oil heater, a condensate truck load-out rack, and four (4) 400 barrel (16,800 gallon) condensate storage tanks.

The TEG skid is designed to dehydrate the inlet gas feeding to Plant B. The Plant B dehydration system operates with a closed loop Vapor Recovery Unit (VRU). The vapors collected in the VRU are recompressed and routed to the inlet gas stream. The EG dehydration system is used to dehydrate the inlet gas feeding to Plant A.

Condensate is first collected in a 60,000 gallon pressurized bullet tank. The pressure in the tank is maintained at about 38 PSIG by a vapor recovery unit. Condensate is manually transferred from the bullet tank to each of the 300 barrel condensate storage tanks. The condensate in the 400 barrel tanks is transported off-site by tanker truck.

The Plant B skid and the TEG skid are subject to the provisions of 40 CFR Part 60 Subpart KKK, Standards of Performance for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants. The Plant A skid is not subject to the Subpart KKK provisions because it was constructed prior to January 20, 1984.

The Kersey/Mewbourn Gas Processing Plant is located southeast of Gilcrest, 1/4 mile north of the intersection of Weld County Roads (WCR) 35 and 38, in Weld County, Colorado. WCR 35 is on the east side of the plant and WCR 38 is on the south side of the plant. The area in which the plant operates is designated as attainment for all criteria pollutants. Wyoming is an affected state within 50 miles of the plant. Rocky Mountain National Park is a Federal Class I designated area within 100 kilometers of the plant.

Construction Permit 97WE0304 sets the Potential To Emit (PTE) for the entire plant as follows:

Pollutant	Potential to Emit (tpy)	Actual (tpy)
NOx	216.2	216.2
VOC	141.7	141.7
CO	211.8	211.8
HAPs	---	12.2

The estimated actual emissions are from the Division database for calendar year 1997. The potential emissions are limited by the conditions in Construction Permit 97WE0304 to a level that classifies this source as a synthetic minor with respect to Prevention of Significant Deterioration (PSD) requirements. The synthetic minor status is achieved by providing emission control equipment on all the engines. A major malfunction of one of the engine emissions control devices, or a deterioration of the efficiency of several of the engine emissions control devices could easily create emission levels in excess of the major source threshold.

At the time the Title V application was submitted the permittee submitted APENs and construction permit applications for all the sources at the plant. The documents were submitted to update, revise, or correct existing construction permits as necessary, or request a new construction permit. Further, the permittee requested a single permit be issued for the entire plant, rather than for each individual source.

The new Construction Permit also required the submittal of a compliance plan for all the sources. The Division accepts the monitoring proposal provided in the Title V application as the submittal of the compliance plan required by the Construction Permit. In the discussion in the following sections, the Division considers the Responsible Official certification submitted with the semi-annual report will serve as the self-certification for Construction Permit 97WE0304. The appropriate provisions of the Construction Permit have been directly incorporated into this operating permit.

The Division accepts the responsible official signature of the Title V application as evidence of compliance for all the sources at the plant at the time the Title V application was submitted.

After the Title V application had been submitted the permittee requested a modification of the alternative operating scenario. The permittee wanted less restrictions on the requirements whenever an engine was replaced.

The magnitude and the nature of the discrepancies between the existing construction permits and the information submitted with the Title V application would have precluded the Division from accepting the facility was in compliance at the time the operating permit application was submitted. A Compliance Order on Consent, last signed on January 8, 1999, noted Duke had reported “like-kind” replacement of some of the engines without the submitting APENs or obtaining construction

permits and failed to properly submit information required by 40 CFR Part 60, Subpart KKK. The Division accepts the signing of the Order as evidence the facility is currently in compliance.

III. EMISSION SOURCES:

The following sources are specifically regulated under terms and conditions of the Operating Permit for this plant:

Internal Combustion Engines Powering Compressors	
P001 - Caterpillar G379 SI-NA	**330 HP w/ AFR & NSCR**
P002 - Waukesha F-3521 GU	**450 HP w/ AFR & NSCR**
P003 - Waukesha L-7042 GSI	**1100 HP w/ AFR & NSCR**
P004 - Waukesha L-7042 GSI	**1232 HP w/ AFR & NSCR**
P005 - Waukesha L-7042 GU	**711 HP w/ AFR & NSCR**
P006 - Waukesha L-7042 GU	**711 HP w/ AFR & NSCR**
P007 - Waukesha L-7042 GU	**711 HP w/ AFR & NSCR**
P008 - Waukesha L-7042 GSI	**1232 HP w/ AFR & NSCR**
P009 - Waukesha L-7042 GSI	**1100 HP w/ AFR & NSCR**
P010 - Waukesha L-7042 GU	**750 HP w/ AFR & NSCR**
P011 - Minneapolis Moline HD504-A6A	**1232 HP w/ AFR & NSCR**
P012 - Waukesha L-7042 GSI	**1232 HP w/ AFR & NSCR**
P013 - Waukesha L-7042 GSI	**1232 HP w/ AFR & NSCR**

1. Applicable Requirements: Construction Permit 97WE0304 was prepared after the Title V permit application was submitted and is being directly incorporated into this operating permit. The Construction Permit set pollutant limits for the total plant, commonly known as 'bubble limits', as well as limits for individual pieces of equipment.

The engines are required to demonstrate compliance by stack tests to be conducted within 180 calendar days of the issuance of the operating permit if the stack tests have not already been completed.

Form 2000-604, Item 10, of the Title V application states that emissions of natural gas from compressor engine blowdown during maintenance and during engine start-up qualifies as an insignificant source. The statement continues that emission limits do not apply during the first ½ hour of operation after a cold start. The Division agrees that if calculations to estimate the emissions released are below the APEN threshold when the maintenance blowdown and engine startup are limited to ½ hour, this activity may be considered an insignificant activity. Records will have to be maintained to demonstrate that these activities are performed in less than ½ hour. The permittee

could not cite a regulatory basis for the startup statement. The Division does not accept that there is such a provision.

2. Emission Factors: Emissions from reciprocating engines are produced during the combustion process, and are dependent upon the fuel mixture, engine design specifications, and specific properties of the natural gas being burned. The pollutants of concern are Nitrogen Oxides (NOx), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC). Small quantities of Hazardous Air Pollutants (HAPs) are also emitted when combustion is incomplete. Approval of emission factors for use with engine emissions is necessary to the extent that accurate actual emissions are required to verify the need to submit Revised APENs to update the Division emission inventory, and for compliance determination and certification. Construction permit 97WE0304 required compliance testing to be performed on the engines to validate the proposed emission factors, given the significance of the proper operation of the emissions control devices in maintaining emissions below the PSD threshold. At the time of the preparation of this operating permit the compliance testing had not been completed.

3. Monitoring Plan: The operating permit established a procedure for the calculation of the emissions based on fuel consumption and a fuel based emission factor. The emissions are to be calculated monthly to determine compliance with the annual (12-month rolling total) limit. A Revised APEN must be submitted to the Division if criteria emissions increase by more than 50 tons per year or 5%, whichever is less, compared to the latest APEN on file with the Division.

A copy of a monitoring guidance grid developed by the Division is included at the end of this document. The grid and the Title V application monitoring proposals were used to define the monitoring requirements for the internal combustion engines. The Division monitoring guidance grid requires more intensive and extensive monitoring of the emissions from internal combustion engines when an engine is equipped with an emissions control device and the total plant emissions are near the PSD major source threshold. The control devices are provided to protect the air quality, reduce the annual fees paid by the permittee, and avoid the PSD major source classification. A small decrease in the control efficiency can result in significant increases in the emissions released. An increased monitoring frequency is necessary to ensure that the control devices are functioning properly.
The permittee reported they have a routine maintenance plan to service the equipment at four (4) month intervals. A calendar quarter frequency would require extra monitoring work. The problem was resolved by increasing the compliance certification to a tri-annual basis as opposed to a semi-annual basis. This will allow the permittee to synchronize the routine scheduled maintenance with the Title V monitoring.

The Division has determined, based on AP-42 emission factors and engineering judgement, that particulate emissions from these type of internal combustion engines will be insignificant if natural gas is exclusively used as the fuel. The use of natural gas will also satisfy the opacity monitoring requirement.

A properly functioning Non-Selective Catalytic Reduction (NSCR) unit will demonstrate a heat rise across the unit as a result of the oxidation, destruction or conversion of the air pollutants. The media deteriorates with time and needs to be replaced or regenerated. Particulate matter from the engine can be trapped in the catalytic material and lead to an increase in the pressure drop across the control device. The accidental backfire of an engine can result in the loss or destruction of the media. The monitoring plan provides reasonable evidence of the presence and functioning of the catalytic media.

4. Compliance Status: The equipment at this site has been operating for an extended time. A current APEN reporting criteria emissions is on file with the Division. Duke certified in the application that natural gas has been used exclusively as the fuel for this unit. As noted previously, the Division accepts the compliance signature of the responsible official as evidence of compliance.

Triethylene Glycol Regeneration Unit w/ Flash Tank & Vapor Recovery for Plant B
Ethylene Glycol Hydration Inhibition Unit w/ Flash Tank for Plant A

1. Applicable Requirements: Construction Permit 97WE0304 established the emission and throughput limits for these units. A future Maximum Achievable Control Technology (MACT) standard is being developed by the US Environmental Protection Agency for operations at oil and gas facilities. The MACT will most likely contain provisions for certain glycol dehydration units, triggered by the daily gas throughput rate. Until such time as the MACT rule is promulgated, no control requirements exist for this point. The permittee has provided a vapor recovery unit for the Plant B unit.

2. Emission Factors: Triethylene or ethylene glycol is contacted with the natural gas stream to remove moisture. This mixture is heated in the still portion of the unit to drive off the water. Some volatile organic compounds and hazardous air pollutants are also released with the water vapor. Emissions from this process are typically measured with a glycol analysis (rich/lean analysis) or predicted using the Gas Research Institute's (GRI) computer software model GLYCalc. The model uses input values for the glycol recirculation rate, cubic feet of gas processed, desired moisture content (dew point) for the processed gas, and the amounts of various constituents in the natural gas in an algorithm to estimate VOC and HAP emissions.

The Division accepts the use of the GLYCalc model to estimate emissions in lieu of rich/lean testing. Once a month the parametric inputs for the GLYCalc model will be recorded. The record of the input parameters will provide a perspective on the range of the input values. The perspective developed will allow consideration of whether more frequent testing is needed for a better estimation of the results. An extended gas analysis will be performed at least once each calendar year. The GLYCalc model will be used on a monthly basis to estimate the emissions based on the parametric inputs and the most recent gas analysis.

Combustion emissions from the two (2) heater are exhausted through a stack separate from the still vent. These heaters fall under the insignificant activity category of Colorado Regulation No. 3, Part C, Section II.E.3.k. As an insignificant activity the heater emissions do not need to be addressed directly by this Operating Permit.

3. Monitoring Plan: The monitoring requirements were established from Construction Permit 97WE0304, the Division guidance grid included at the end of this document, and the monitoring information provided in the Title V application.

The permittee reported they have a routine maintenance plan to service the equipment at four (4) month intervals. A calendar quarter frequency would require extra monitoring work. The problem was resolved by increasing the compliance certification to a tri-annual basis as opposed to a semi-annual basis. This will allow the permittee to synchronize the routine scheduled maintenance with the Title V monitoring.

Input parameters from the Plant A dehydrator for the GRI GLYCalc model will be recorded at least once per month. For the Plant B dehydrator, which has a vapor recovery system, the values will be recorded daily. Each calendar month the newest version of the GRI GLYCalc computer model will be used to estimate the emissions of VOC. Recording the values of model input parameters monthly allows the variability in the parameters to be followed. The permittee submitted information that demonstrated a consistent quality for the natural gas. On the basis of the information provided, the gas testing frequency was extended to an annual frequency. If the gas quality does not remain consistent the testing will revert to a tri-annual frequency.

The vapor recovery system for the Plant B dehydrator returns the vapor into the gas processing system. The permittee claims no emissions are released, or 100% control efficiency. This claim is valid as long as there are no leaks in the vapor capture and return equipment and piping. This piping and equipment is required to be included in the Subpart KKK leak detection/repair program to provide monitoring for any leaks.

A Revised APEN is required if a significant increase of VOC or HAPs occur as defined in Colorado Regulation No. 3, Part A, Section II.C.2. compared to the APEN currently on file with the Division.

4. Compliance Status: The equipment at this site has been operating for an extended time. A current APEN reporting criteria emissions is on file with the Division. Duke certified in the application that natural gas has been used exclusively as the fuel for this unit. As noted previously, the Division accepts the compliance signature of the responsible official as evidence of compliance.

Fugitive Emissions of Volatile Organic Compounds from Equipment Leaks
Plant A not subject to Subpart KKK Provisions
Plant B is subject to Subpart KKK Provisions

1. Applicable Requirements: The Division has made the determination that fugitive VOC emissions from equipment leaks at gas compression or processing facilities must be calculated and evaluated for the appropriate permitting requirements. Only the piping and equipment for Plant B are currently subject to the leak testing/repair requirements of 40 CFR Part 60 Subpart KKK.

2. Emission Factors: The fugitive leak emissions are calculated based on emission factors from EPA's Protocol for Emission Leak Estimates. These factors have changed several times in the recent past. The factors used were current at the time the construction permit was prepared. The EPA factors estimate the total organic compounds. The factors are multiplied by the number of components of each type (e.g. compressor seals, flanges, etc) and the VOC weight percentage in the gas stream as determined in the most recent gas analysis.

The provisions of Subpart KKK allow the use of a control factor to recognize the benefits of the leak detection and repair program. The Title V application Plant B calculations included a 75 percent (%) control factor for all the components except the flanges/connectors. For the flanges/connectors, a 30% control factor was used. The Division accepted the use of these control factors. The leak detection/repair program for Plant A will be less intensive and no control factor may be applied.

3. Monitoring Plan: Piping and equipment modifications at a facility are an on-going process. Sufficient time has lapsed since the Construction Permit component count was performed for modifications to have changed the component count. The permittee must perform an initial count of the components within 90 days of the issuance of the Operating Permit. The permittee is then required to maintain a running tally of the component count in order to perform the fugitive leak emissions estimate. The count must be re-established in order to provide the correct base for the running tally. An actual physical count of the number of process valves, relief valves, pump seals, compressor seals, flanges/connections and so forth is to be performed once every five years to verify the tally has been correctly and currently maintained. A 50% or 5 ton per year increase in criteria pollutant emissions, whichever is less, will necessitate the need for submittal of a Revised APEN.

The details and actions required for leak testing and repair of the piping and equipment for Plant B is to be set forth in a leaking testing and repair program document. The document is to be prepared detailing how the permittee will conduct the leak testing/repair program to meet the Subpart KKK requirements. The document must define the applicable as well as the nonapplicable requirements,

and identify any options the permittee elects to select. The document is to be submitted for Division approval for implementation and may be used for compliance determinations.

The Plant B Hydration Inhibitor unit is equipped with a vapor recovery system. The permittee claims zero emissions from the system, meaning there are no leaks. The vapor recovery system must be included in the Subpart KKK program provisions and monitored at a frequency to demonstrate zero leaks.

4. Compliance Status: The equipment at this site has been operating for an extended time. A current APEN reporting criteria emissions is on file with the Division. Duke Energy certified in the application that natural gas has been used exclusively as the fuel for this unit. As noted above, the Division accepts the compliance signature of the responsible official as evidence of compliance.

Condensate Storage Tank Truck Loadout

1. Applicable Requirements: Construction Permit 97WE0304 established the applicable requirements for this source. The equipment and piping for the rack is not subject to the Subpart KKK leak testing requirements.

2. Emission Factors: The emissions are estimated by a formula provided by AP-42.

3. Monitoring Plan: Monitoring will consist of tracking the amount of condensate loaded onto trucks each month.

A Revised APEN is required if a significant increase of VOC or HAPs occur as defined in Colorado Regulation No. 3, Part A, Section II.C.2. compared to the APEN currently on file with the Division.

4. Compliance Status: The equipment at this site has been operating for an extended time. A current APEN reporting criteria emissions is on file with the Division. As noted previously, the Division accepts the compliance signature of the responsible official as evidence of compliance.

Hot Oil Heater

1. Applicable Requirements: Construction Permit 97WE0304 established the applicable requirements for this source. The removal of the short term limits established by the Construction Permit makes this source subject to the fuel burning equipment particulate emission standard of Regulation No. 1, Part III. A.1.b. The standard is set by the equation $0.5(10.0)^{-0.26}$ as 0.27 pounds per million Btu of heat input. The estimated maximum particulate emissions are 0.0137 pounds per million Btu of heat input. Thus the heater will always be in compliance with the Regulation No. 1 particulate standard. The heater is subject to Regulation No. 6, Part A, Subpart Dc (40 CFR Part 60 Subpart Dc) Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units Paragraph 60.48c (Construction Permit 97WE0304, Condition 11). The Division's analysis of the applicable requirements for this natural gas-fired unit indicated that there are no emission limits imposed by the Subpart. Therefore daily fuel records required by 60.48c(h) and (I) do not have any regulatory impact. Subpart Dc will be listed as an applicable requirement in the permit, but there will not be any standards, monitoring, or record keeping associated with the source.

2. Emission Factors: The emissions were developed from the appropriate section of AP-42.

3. Monitoring Plan: Monitoring will consist of tracking the amount of fuel combusted by the heater.

A Revised APEN is required if a significant increase of VOC or HAPs occur as defined in Colorado Regulation No. 3, Part A, Section II.C.2. compared to the APEN currently on file with the Division.

4. Compliance Status: The equipment at this site has been operating for an extended time. A current APEN reporting criteria emissions is on file with the Division. As noted previously, the Division accepts the compliance signature of the responsible official as evidence of compliance.

Insignificant Activities

The permittee needs to periodically review the insignificant activities to determine if they are still insignificant and in compliance with all applicable requirements. A record of review, the compliance determination, and any additions, deletions or changes to the insignificant source inventory should be maintained. The record will support the annual compliance certification for the insignificant

sources. The inventory of insignificant sources provided in the permit application is included in Appendix A of the operating permit as a starting reference.

The Division's has some previous experience with purging/venting procedures during the startup and shutdown of compressor engines similar in size to the ones in this permit. The Division has generally found the engine dimensions and the presumption of a 20% VOC content in the gas stream results in the VOC emissions being less than two (2) tons per year. Since this estimated value is below the APEN reporting threshold established in Colorado Regulation 3 the Division concludes that these emissions are insignificant. The permittee will need to keep records to demonstrate the maintenance and startup blowdown procedures do not require more than 30 minutes.

The four (4) 300 barrel condensate storage tanks are eligible candidates for construction permit because they satisfy the applicability provisions of 40 CFR Part 60 Subpart Kb based on capacity and installation date. The tanks are, however, exempt from Subpart Kb, based on §60.110.b.d.4 which states "Vessels with a design capacity of less than or equal to 1,589,874 m^3 used for petroleum or condensate stored, processed, or treated prior to custody transfer." Each tank has a capacity of 47.70 m^3 and is used for storage prior to custody transfer.

Alternative Operating Scenario

Engine Replacement

The permittee requested that both temporary and permanent replacements of the internal combustion engines be considered an Alternative Operating Scenario. A temporary engine would operate for less than 3 months in the same service while an existing engine was being repaired or overhauled. The Division acceptance of the operation of either a temporary or permanent engine is contingent upon emissions testing of the engine to demonstrate the emissions comply with the permit limits. Testing must be conducted under representative conditions for the engine being replaced. The permittee must be willing to accept a determination of non-compliance should the emissions testing determine the emissions from the engine in question exceed those defined in the Operating Permit. Any non-compliance will be considered to exist from the day the replacement engine started operation.

Hazardous Air Pollutants

The applicable requirement is for the reporting of estimated emissions above the appropriate bin thresholds established in Appendix D of Regulation No. 3. Hazardous air pollutant emissions for each source are estimated from manufacturer's information, AP-42 and GRI technical reports. A Revised APEN must be submitted when there is an increase in hazardous air pollutants of 50 percent (%) or five (5) tons per year, whichever is less, above the level of the last APEN submitted. The Division accepts this source was in compliance at the time the Title V application was submitted.

Permit Shield

The intent of the permit shield is to provide limited protection to the plant in the event of an error in the evaluation of whether a regulation, or portion of a regulation applies. The plant identifies the issue and presents its position. The Division reviews the position. If the Division and the plant mutually agree on the position, the issue is recorded in the permit. If, at a later date, it is determined that an error was made in the mutual decision, the plant is protected from enforcement action until the permit can be reopened and the correct requirements and a compliance schedule inserted.

In this application, an extensive list of non-applicable sections of the Federal and State regulations are identified for the sources, and the request for the shield justified.

Accidental Release Prevention Plan (Section 112(r))

Section 112(r) of the Clean Air Act mandates a new federal focus on the prevention of chemical accidents. Sources subject to these provision must develop and implement risk management programs that include hazard assessment, a prevention program, and an emergency response program. They must prepare and implement a Risk Management Plan (RMP) as specified in the Rule.

Section 68.215(e) of the Federal Clean Air Act requires the Division to address four issues in regards to operating permit sources subject to 112(r):

1. Verify source submitted and register an RMP by deadline

EPA is in the process of setting up a Website specifically for 112(r) plans. All 112(r) sources will electronically submit their plans to this "designated central location". The Division will require sources certify in their annual compliance certification that they are/are not subject to 112(r) and they have/have not submitted a Risk Management Plan (RMP) to the designated central location by June 20, 1999. In addition, the Division will check the 112(r) website to verify that a RMP was actually submitted to the website by the deadline. Failure to submit a RMP by the June deadline by sources subject to 112(r) will be considered a permit deviation for reporting purposes under Title V.

2. Verify that source owner/operator has submitted a source certification or in its absence has submitted a compliance schedule.

As mentioned above, the Division will require that sources certify in their annual compliance certification that they are/are not subject to 112(r) and they have/have not submitted a Risk Management Plan (RMP) to the designated central location by June 20,1999. If they are subject to 112(r) but did not submit an RMP on time, a compliance schedule under the provisions of Title V must be submitted to the Division by the source. Failure to submit a RMP or a compliance schedule by the June deadline by sources subject to 112(r) will be considered a permit deviation for reporting purposes under Title V.

3. For some or all sources use one or more mechanisms such as completeness check, source audits, record review, or facility inspections to ensure permitted sources are in compliance with the requirements of this part

The Division may choose to perform any or all of the activities listed under this subsection. Although there is no specific number of such actions required in the 112(r) rule, a June 3, 1997 draft 112(r) implementation guidance from EPA states that "Congress considered a requirement that 1.4 percent of the RMPs be audited annually, but dropped that provision."

The Division will, at a minimum, perform a "completeness check" on an unspecified number of Title V 112(r) sources. The website that EPA is in the process of developing to accept 112(r) RMP's will include software that will electronically conduct a completeness check on the RMP's. For the purposes of this operating permit, such check shall serve as the completeness check required under 68.215(e)(3). As noted in the Preamble to the final 112(r) rule (June 20, 1996 Federal Register, page 31691), "EPA agrees that the review for quality or adequacy of the RMP is best accomplished by the implementing agency..." In Colorado, the implementing agency is the U.S. EPA. If the EPA website software indicates that a source did not submit a complete plan, it will be considered a permit deviation for

reporting purposes under Title V and the Division may initiate an enforcement action for failure to meet the Title V permit condition (see below). Per the Preamble (page 31691), the Division may perform the completeness checks in a time frame consistent with the source's Title V certifications.

4. Initiate enforcement action as necessary

This refers to enforcement under Title V, not under Part 68 (112(r)). If a source fails to file a RMP or a compliance schedule by the June deadline or the EPA software indicates that the RMP is not complete, it will be considered a permit deviation for reporting purposes under Title V and the Division may initiate an enforcement action.

Short Term Limits

As noted at the start of this review document, new procedures resulted in the removal of short term emission and production/throughput limits from Construction Permits. The table below documents existing short term Construction Permit limits that were not incorporated in the Operating Permit.

Construction Permit	Emission Point	NOx, lb/hr	CO, lb/hr	VOC, lb/hr	PM & PM_{10}, lb/hr	SO2, lb/hr	Fuel Use or Process rate
97WE0304	P004; P008; P012; P013 - 1232 HP Engine	5.43	5.43	2.42			10,069 scf/hr
	P005; P006; P007 - 711 HP Engine	3.13	3.13	1.57			5,812 scf/hr
	P003; P009 - 1100 HP Engine	4.85	4.85	2.43			8,721 scf/hr
	P001 - 330 HP Engine	1.46	1.46	0.73			2,697 scf/hr
	P002 - 450 HP Engine	1.98	1.98	0.99			3,678 scf/hr
	P010 - 750 HP Engine	3.31	3.31	1.65			6,130 scf/hr
	P011 - 100 HP Engine	0.44	0.44	0.22			1,038 scf/hr
	P019 - Condensate Loadout			3.13			24,291 gpd
	P012 - 10 MMBtu/Hr Heater	1.35	0.34	0.03	0.13	0.01	9,615 scf/hr

Construction Permit	Emission Point	NOx, lb/hr	CO, lb/hr	VOC, lb/hr	PM & PM_{10}, lb/hr	SO2, lb/hr	Fuel Use or Process rate
97WE0304	D014 - Hydration Inhibition Unit			0.71			25 MMscf/d & 57.0 gph recirculation rate
	D015 - TEG Dehydration Unit			0.0			25MM scf/d & 3.0 gpm recirculation rate
	F017 - Plant B Fugitive VOC			0.61			
	F018 - Plant A Fugitive VOC			3.87			
	Total Plant Emissions	49.4	48.3	32.4			

Miscellaneous

From time to time published emission factors are changed based on new or improved data. A logical concern is what happens if the use of the new emission factor in a calculation results in a source being out of compliance with a permit limit. For this operating permit, the emission factors or emission factor equations included in the permit are considered to be fixed until changed by the permit. Obviously, factors dependent on the fuel sulfur content or heat content can not be fixed and will vary with the test results. The formula for determining the emission factors is, however, fixed. It is the responsibility of the permittee to be aware of changes in the factors, and to notify the Division in writing of impacts on the permit requirements when there is a change in factors. Upon notification, the Division will work with the permittee to address the situation.