**TECHNICAL REVIEW DOCUMENT**
**for**
**OPERATING PERMIT 96OPGA137**

Wildhorse Energy Partners, LLC - Clough Compressor Station
Garfield County
Source ID 0450077

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Revised April 30, 1998 & February 3, 1999

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## 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 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. The conclusions made in this report are based on information provided in the original application submittal of February 15, 1996, supplemental technical submittals of June 14 and September 9, 1996, January 12, 1998 and telephone conversations with the source. This narrative is intended only as an adjunct for the reviewer and has no legal standing.

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 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 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 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. SOURCE DESCRIPTION:

This source is primarily classified as a natural gas compression facility defined under Standard Industrial Classification 4922. Gas is compressed to specification for transmission to sales pipelines using five (5) internal combustion engines to power compressor units. Gas is also dehydrated in contact with triethylene glycol in four (4) dehydration units to reduce the moisture content of the compressed gas to acceptable levels. This facility has undergone two transfer of ownerships and one change of name. The original construction permits associated with this operating permit have been modified to incorporate these changes as necessary.

The facility submitted a modification request during the processing of this application. The source wished to change the emission factors used for S004 to match those used for S002 & S003 since the engines are the same make and model. This will allow all three engines to be listed under Condition 2 in the Operating Permit. The source also submitted revised emission factors for the three engines resulting in a slight increase in NOx and no change in CO for S002 & S003, and a reduction in NOx and an increase in CO for S004. The facility also wished to change the emission factors for the grandfathered Waukesha engine. The source stated that they had submitted a revised APEN in December 1997 with these revised factors. The factors are equal NOx/CO and result in an increase in NOx and CO and a decrease in VOCs. New VOC limits were also requested by the source for all four dehydrators due to changes in the dehy operating parameters. These new limits result in large increases in both VOCs and HAPs.

The facility is located near the community of Rifle in Garfield County in an area designated as attainment for all criteria pollutants. The modification to change emission factors and operating parameters does not appear to result in a significant increase in emissions. The source's PTE prior to the installation of the fourth dehydrator was 248.75 tpy of VOC and the fourth dehydrator added 86.5 tpy. The facility PTE is close to the PSD threshold, however the GLYCALC models have been run in a manner that results in very conservative emissions estimates that are probably overestimating actual emissions. This source is considered to be an existing major stationary source in an attainment area (Potential to Emit > 250 tons/yr). Future modifications to this facility which are in excess of significance levels as defined in Colorado Regulation No. 3, Part A, Section I.B.58, would result in the application of PSD regulations. This facility is not subject to any Maximum Achievable Control Technology (MACT) standards at the time of permit issuance. However, a future MACT standard is being developed for operations at Oil and Gas facilities which may apply to this facility. Facility emissions are as follows:

| Pollutant | PTE (tpy) | Mod. PTE (tpy) | Actual (tpy) |
|---|---|---|---|
| NOx | 250.13 | 261.73 | 237.13 |
| VOC | 150.94 | 344.4 | 136.6 |
| CO | 132.08 | 221.68 | 130.5 |

| Pollutant | PTE (tpy) | Mod. PTE (tpy) | Actual (tpy) |
|---|---|---|---|
| HAPs | 70.07 | 210.89 | 70.58 |

Potential to Emit is based on the existing Construction Permits and the modification received during processing of the Title V application. Actual emissions are based on a 1997 AIRS/AFS report. The actual HAPs is higher than the potential due to the bin reporting levels not being triggered for reporting on construction permits. These HAPs were reported to AIRS.

This facility is within 100 kilometers of three (3) Federal Class I designated areas: Flattops Wilderness Area (WA), Maroon Bells Snowmass WA and West Elk WA. The Federal Land Manager for these areas will therefore receive a copy of the Public Comment notice. There are no affected states (within a 50 mile radius) associated with this facility.

This facility has indicated that it is not subject to 112(r), the Accidental Release Requirements.

## III. EMISSION SOURCES:

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

**Units S001- One (1) Waukesha, F2895GU Four Cycle, Rich Burn Internal Combustion Engines, Site Rated at 310 HP. Serial No. 263059.**

Discussion:

**1. Applicable Requirements -** This engine was placed into service in December 1956 and has not undergone any modifications since. As such it is considered "grandfathered" from Construction Permit requirements and is not permitted. The only applicable requirement for this engine is the 20% opacity standard from Colorado Regulation 1. The emissions associated with this engine as requested in the modification package received during processing of the Title V application are: 44.9 tpy of NOx, 6.0 tpy of VOCs, and 44.9 tpy of CO. The source will only be required to calculate actual emissions annually for emissions fee purposes.

**2. Emission Factors -** Emissions from reciprocating engines are produced during the combustion process, and are dependent upon the air to fuel ratio adjustment 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 these engines is necessary to the extent that accurate actual emissions are required to verify the need to submit Revised APENs to

update the Division's Emission Inventory and for determining annual fees. The following factors are acceptable for 4 Cycle, Internal Combustion engines, since they are comparable to AP-42:

| Pollutant | Emission Factor | AP-42 |
|---|---|---|
| NOX | 15.0 g/hp-hr | 10 g/hp-hr |
| CO | 15.0 g/hp-hr | 8.6 g/hp-hr |
| VOC | 2.0 g/hp-hr | 0.14 g/hp-hr |

**3. Monitoring Plan -** Wildhorse Energy will calculate emissions for fee purposes based on site rated horsepower and operating hours. Specific monitoring guidance for Internal Combustion engines located in attainment areas has been developed by the Division as shown on the attached grid titled, "Compliance/Scenario Summary - Gas Fired IC Engines." Since all of the above emission factors are above AP-42 the grid indicates that only annual fuel use recordkeeping and emissions calculation and reporting will be required.

The Opacity standard of 20% will be demonstrated by a certification that the engines have used pipeline quality natural gas exclusively during the reporting period. The Division has determined, based on AP-42 emission factors and engineering judgement, that particulate emissions from these engines will be insignificant if only natural gas is burned.

**4. Compliance Status -** Current APENs reporting criteria emissions are on file with the Division. Wildhorse certified within the application that they believe the units to be in compliance. An examination of the source file found no outstanding compliance issues. Therefore, these units are currently considered to be in compliance with all applicable requirements.

**<u>Units S002, S003 and S004</u> - Three (3) Caterpillar Model G399, Rich Burn Natural Gas Fired Internal Combustion Engines, Site Rated at 472 HP Each. Serial No.'s 49C800, 49C697 and 49C771.**

Discussion:

**1. Applicable Requirements -** These engines were installed and began operation in February 1992 and January 1994. The Initial Approval Construction Permits 91GA566-(1&2) and 93GA1477 were last issued on November 14, 1997 with a change in name only with the following applicable requirements: visible emissions shall not exceed twenty percent (20%) opacity; fuel consumption of limits; emission limits on each engine for Nitrogen Oxides (NOX), Carbon Monoxide (CO) and Volatile Organic Compounds

(VOC); and APEN reporting per Colorado Regulation No. 3, Part A.II. The limits listed in the Operating Permit reflect those requested in the modification submitted during processing of the permit application.

The source commented to the Division in a letter dated March 3, 1998 that there was a discrepancy in the heating value used to calculate emissions and the heating value used by engine manufacturers to represent heat rate. The Division has agreed to use the Lower Heating Value (LHV) for emission calculations. As a consequence, the limit on throughput has been raised by 10% to compensate for the difference in HHV vs. LHV. The values listed above in the applicable requirements already represent that change.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 91GA566-(1&2) and 93GA1477 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

**2. Emission Factors -** Emissions from these reciprocating engines are produced during the combustion process, and are dependent upon the air to fuel ratio adjustment 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 this engine are necessary to the extent that accurate actual emissions are required to verify the need to submit Revised APENs to update the Division Emission Inventory. The following factors are acceptable for 4 Cycle, Rich Burn Internal Combustion engines since they are above AP-42.

| Pollutant | Emission Factor | AP-42 |
|---|---|---|
| NOX | 4.09 lbs/MMBTU | 2.3 lbs/MMBTU |
| VOC | 0.28 lbs/MMBTU | 0.03 lbs/MMBTU |
| CO | 3.39 lbs/MMBTU | 1.6 lbs/MMBTU |

**3. Monitoring Plan -** Wildhorse will calculate emissions for fee purposes and to determine compliance with permit limits using fuel consumption. The emission factors proposed are above AP-42 factors for all pollutants. Therefore, according to the monitoring grid attached, the source will be required to conduct the emission calculations and fuel use on a rolling twelve month basis. The BTU Content of the natural gas used shall be calculated using the most recent gas analysis in the equation below:

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

*where*:

$C_i$ = *Concentration of Component i mol %*

$Hc_i$ = *Heat of Combustion* (*vapor state of reactants*) *at* 60 °*F*, 14.696 *psia Btu/scf*

The Opacity standard of 20% will be demonstrated by a certification that the engines have used natural gas exclusively during the reporting period.

**4. Compliance Status -** Current APENs reporting criteria emissions are on file with the Division. Wildhorse certified within the application that they believe the units to be in compliance. An examination of the source file found no outstanding compliance issues. Therefore, these units are currently considered to be in compliance with all applicable requirements.

**<u>Unit S005 & S006</u> - Two (2) P&A Model: PA-6MM-1000-3P, Triethylene Glycol Dehydrators, Rated at 6 MMSCFD Each. Serial No.'s 188 and 189**

Discussion:

**1. Applicable Requirements -** These units were installed and began operation in December 1956 and have Colorado Initial Approval Construction permits 96GA494-1&2 with the following applicable requirements: visible emissions shall not exceed twenty percent (20%) opacity; the natural gas processing rate shall not exceed 2,190 MMSCF per year each; records of the actual natural gas process rate and actual amount of make-up triethylene glycol shall be maintained at the site and made available to the Division for inspection; emissions of air pollutants shall not exceed 19.8 tons per year each of Volatile Organic Compounds (VOCs); and APEN reporting per Colorado Regulation No. 3, Part A.II.

A future Maximum Achievable Control Technology (MACT) standard is being developed for operations at Oil and Gas facilities which may apply to emissions from glycol dehydration units.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 96GA494-1&2 and the appropriate provisions of the construction permit have been directly incorporated into this operating permit.

**2. Emission Factors -** Triethylene glycol is contacted with the natural gas stream to remove moisture. This glycol-water mixture is heated in the still vent portion of the unit which drives off the water and some entrained VOCs. Emissions from this process were predicted using the Gas Research Institute's GLYCALC Model. Emission factors of VOC and various HAPs are dependent upon the variables input into this Model. These variables include glycol recirculation rate, cubic feet of gas processed, inlet temperature and pressure of the processed wet gas, and percentage breakdown by volume of constituents in the natural gas. Combustion emissions from the heater are exhausted through a separate stack. The burners on these dehydrators are rated at 0.379 MMBTU/hr and fall under the insignificant activity category of Colorado Reg. 3, Part C, Section II.E.3.k. Therefore, these combustion emissions do not need to be regulated in the Operating Permit.

**3. Monitoring Plan -** The Gas Research Institute's manual for their GLYCALC Version 3.0 Model defines the wet gas (inlet) temperature, glycol recirculation rate, and gas BTEX content as the three critical inputs to the Model for triethylene glycol units. Changes to the gas flow rate and inlet pressure do not radically affect emissions from glycol dehydrators. Therefore, parametric monitoring of the inlet temperature, recirculation rate and BTEX content will be required as part of the monitoring plan for this site as detailed in the Operating Permit. Inlet pressure will be held constant for modeling purposes. Modeling will only be required when the measured values for inlet temperature, recirculation rate and BTEX content do not meet the comparison criteria as related to the stipulated values in the permit. The specific parameter values listed in the permit were supplied by Wildhorse and define a worst-case scenario for dehydrator emissions.

**4. Compliance Status -** A current APEN reporting criteria emissions is on file with the Division. Wildhorse certified within the application that natural gas has been used exclusively as the fuel for this unit and that they believe the unit to be in compliance. An examination of the source file found no outstanding compliance issues. Therefore, this unit is currently considered to be in compliance with all applicable requirements.

**<u>Unit S007 & S010</u> - One (1) Sivalis GCR-500-450 Model, Serial No. 42721, Rated at 12 MMSCFD and One (1) Natco, Serial No. HL-9D74602-02, Rated at 8 MMSCFD Triethylene Glycol Dehydrator**

Discussion:

**1. Applicable Requirements -** These units were installed and began operation in 1956 and 1997 and have Colorado Initial Approval Construction permits 96GA494-3 and 97GA0103 with the following applicable requirements: visible emissions shall not exceed twenty percent (20%) opacity; the natural gas processing rate shall not exceed 4,380 MMSCF per year each; records of the actual natural gas process rate and actual amount of

make-up triethylene glycol shall be maintained at the site and made available to the Division for inspection; circulation rate of triethylene glycol shall not exceed 120.0 gallons per hour for source S010; emissions of air pollutants shall not exceed 39.5 tons per year and 41.9 tons per year of Volatile Organic Compounds (VOCs); and APEN reporting per Colorado Regulation No. 3, Part A.II.

A future Maximum Achievable Control Technology (MACT) standard is being developed for operations at Oil and Gas facilities which may apply to emissions from glycol dehydration units.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permits 96GA494-3 and 97GA0103 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

**2. Emission Factors -** Triethylene glycol is contacted with the natural gas stream to remove moisture. This glycol-water mixture is heated in the still vent portion of the unit which drives off the water and some entrained VOCs. Emissions from this process were predicted using the Gas Research Institute's GLYCALC Model. Emission factors of VOC and various HAPs are dependent upon the variables input into this Model. These variables include glycol recirculation rate, cubic feet of gas processed, inlet temperature and pressure of the processed wet gas, and percentage breakdown by volume of constituents in the natural gas. Combustion emissions from the heater are exhausted through a separate stack. The burners for these dehydrators are rated at less than 5 MMBTU/hr and fall under the insignificant activity category of Colorado Reg. 3, Part C, Section II.E.3.k. Therefore, these combustion emissions do not need to be regulated in the Operating Permit.

**3. Monitoring Plan -** The Gas Research Institute’s manual for their GLYCALC Version 3.0 Model defines the wet gas (inlet) temperature, glycol recirculation rate, and gas BTEX content as the three critical inputs to the Model for triethylene glycol units. Changes to the gas flow rate and inlet pressure do not radically affect emissions from glycol dehydrators. Therefore, parametric monitoring of the inlet temperature, recirculation rate and BTEX content will be required as part of the monitoring plan for this site as detailed in the Operating Permit. Inlet pressure will be held constant for modeling purposes. Modeling will only be required when the measured values for inlet temperature, recirculation rate and BTEX content do not meet the comparison criteria as related to the stipulated values in the permit. The specific parameter values listed in the permit were supplied by Wildhorse and define a worst-case scenario for dehydrator emissions.

**4. Compliance Status -** A current APEN reporting criteria emissions is on file with the Division. Wildhorse certified within the application that natural gas has been used exclusively as the fuel for this unit and that they believe the unit to be in compliance. An examination of the source file found no outstanding compliance issues. Therefore, this unit is currently considered to be in compliance with all applicable requirements.

**Unit F008 - Fugitive VOC Emissions from Equipment Leaks.**

Discussion:

**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. Wildhorse submitted calculations documenting VOC emissions from this plant. Total facility emissions of VOC exceed the 5 ton per year permitting threshold in Colorado Regulation 3, Part B, Section III.D.c. Therefore, Colorado Initial Approval Construction permit 96GA616 was issued on May 6, 1997 limiting VOC fugitive emissions to 2.6 tons per year. This permit was last issued on November 14, 1997 with a change in name only.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permit was issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permit 96GA616 and the appropriate provisions of the construction permit have been directly incorporated into this operating permit.

**2. Emission Factors -** Wildhorse has calculated emissions from equipment leaks based on emission factors from EPA's Protocol for Emission Leak Estimates (Table 2-6 (EPA 453/R-95-017)). Factors are multiplied by the number of components of each type (e.g. Compressor Seals) and the VOC weight percentage in the organic portion of the gas stream as determined in the most recent analysis. EPA factors are given in terms of Total Organic Compounds.

**3. Monitoring Plan -** As a means of recordkeeping, an initial physical hard-count of facility components will be conducted within 90 days of permit issuance to verify existing hardware inventory. Records shall be kept of all component additions and deletions, and a running tally maintained. A physical hard-count of facility components shall be conducted every five years following the initial count required under this condition.

**4. Compliance Status -** A current APEN reporting criteria emissions is on file with the Division. Wildhorse certified within the application that they believe the unit to be in compliance. An examination of the source file found no outstanding compliance issues.

Therefore, this unit is currently considered to be in compliance with all applicable requirements.

**<u>Unit S009</u>- One (1) Waukesha Model L36GL, Clean Burn Natural Gas Fired Internal Combustion Engines, Site Rated at 750 HP. Serial No. Unknown.**

Discussion:

**1. Applicable Requirements -** This engine was installed and began operation in 1997. The Initial Approval Construction Permit 97GA0102 was last issued on November 14, 1997 with a change in name only with the following applicable requirements: visible emissions shall not exceed twenty percent (20%) opacity; consumption of natural gas shall not exceed 61.6 MMSCF per year; emissions of air pollutants for each engine shall not exceed 18.83 tons per year of Nitrogen Oxides (NOX), 7.24 tons per year of Volatile Organic Compounds (VOC), and 12.68 tons per year of Carbon Monoxide (CO); a performance test will be conducted to measure the emission rates for Oxides of Nitrogen and Carbon Monoxide using EPA approved methods; and APEN reporting per Colorado Regulation No. 3, Part A.II.

The source commented to the Division in a letter dated March 3, 1998 that there was a discrepancy in the heating value used to calculate emissions and the heating value used by engine manufacturers to represent heat rate. The Division has agreed to use the Lower Heating Value (LHV) for emission calculations. As a consequence, the limit on throughput has been raised by 10% to compensate for the difference in HHV vs. LHV. The values listed above in the applicable requirements already represent that change.

The due date of the first semi-annual monitoring report required by this operating permit will be more than 180 days after the initial approval construction permits were issued and/or the equipment commenced operation. Therefore, the Division considers that the Responsible Official certification submitted with that report will serve as the self-certification for construction permit 97GA0102 and the appropriate provisions of the construction permits have been directly incorporated into this operating permit.

**2. Emission Factors -** Emissions from these reciprocating engines are produced during the combustion process, and are dependent upon the air to fuel ratio adjustment 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 this engine are necessary to the extent that accurate actual emissions are required to verify the need to submit Revised APENs to update the Division Emission Inventory. The following factors are acceptable for 4 Cycle, Lean Burn Internal Combustion engines.

| Pollutant | Emission Factor | AP-42 |
|---|---|---|
| NOX | 0.67 lbs/MMBTU | 3.2 lbs/MMBTU |
| CO | 0.45 lbs/MMBTU | 0.42 lbs/MMBTU |
| VOC | 0.26 lbs/MMBTU | 0.18 lbs/MMBTU |

All emission factors are above AP-42 except for NOx.

**3. Monitoring Plan -** Wildhorse will calculate emissions for fee purposes and to determine compliance with permit limits using fuel consumption. The emission factors proposed are above AP-42 factors for all pollutants except NOx. Therefore, according to the monitoring grid attached, the source will be required to conduct the emission calculations and fuel use monitoring on a rolling twelve month basis. Also portable monitoring will be required quarterly for CO and NOx. CO is included because of the inverse relationship between CO and NOx. Also, a one time performance stack test shall be conducted as required in construction permit 97GA0102. The BTU Content of the natural gas used shall be calculated as done above for S002, S003 & S004.

The Opacity standard of 20% will be demonstrated by a certification that the engines have used natural gas exclusively during the reporting period.

**4. Compliance Status -** Current APENs reporting criteria emissions are on file with the Division. Wildhorse certified within the application that they believe the units to be in compliance. An examination of the source file found no outstanding compliance issues. Therefore, these units are currently considered to be in compliance with all applicable requirements.

## IV. Insignificant Activities

New engine oil storage, 9450 gal
Crankcase oil storage, 500 gal
Two (2) TEG storage tanks, 100 & 500 gal
Ambitrol (propylene glycol solution) storage tank, 300 gal
Three (3) water storage tanks, 1050, 2520, &12600 gal
Dehydrator Units, Natural gas-fired heaters, < 5MMBtu/hr

## V. Alternative Operating Scenarios

**Temporary Engine Replacement-**

Wildhorse has requested that temporary replacement of engines during times of engine overhaul

be considered an Alternative Operating Scenario under the Operating Permit if they can determine through flue gas analyzer testing that emissions will be equal to or less than those from the engine replaced. The Division has concluded that temporary replacement will be defined as less than a 3 month period. Wildhorse must be willing to accept a determination of non-compliance should flue gas analyzer testing indicate that the emission factors for the engine in question exceed those defined in the Operating Permit. Non-compliance will be considered to have occurred from the day the engine was replaced.

## VI. Accidental Release Program - 112(r)

This facility has indicated in the application that they are not subject to the provisions of 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.

## VII. Permit Shield

The following requirements were requested to be included under the permit shield as non-applicable to the facility:

| Emission Unit Description & Number | Applicable Requirement | Justification |
|---|---|---|
| ALL | 40 CFR Part 60 New Source Performance Standard, Subpart KKK (Adopted by Reference in Colorado Regulation No. 6, Part B) - Equipment Leaks of VOC from Onshore Natural Gas Processing Plants | This facility is not a natural gas processing plant as defined in the subpart. |
| Storage Vessels | 40 CFR Part 60 New Source Performance Standard, Subparts K, Ka, and Kb (Adopted by Reference in Colorado Regulation No. 6, Part B) -Storage Vessels for Petroleum Liquids, and Volatile Organic Liquid Storage Vessels | This facility does not store materials meeting the definition or petroleum liquid or meet the size threshold given in these subparts. |
| All | 40 CFR Part 72 (Adopted by Reference in Colorado Regulation No. 6, Part B) - Acid Rain Program | This facility does not operate an affected unit as defined by this part. |
| All | Colorado Regulation No. 7 (Except Sections V, VI.B.1, VI.B.2, VII.C) | This regulation applies to facilities in ozone non-attainment areas only. This facility is located in an ozone attainment area. |

## VIII. Short Term Limits Removed from Operating Permit

- lb per hour and lb per MMscf VOC limitations
- lb per hour and lb per MMscf CO limitations
- lb per hour and lb per MMscf NOx limitations
- Scf per hour Fuel Consumption Limitation