



April 15, 2016

Denver International Airport, Revenue Management  
8500 Peña Boulevard, AOB Room 9870  
Denver, Colorado 80249

Colorado Department of Public Health  
Air Pollution Control Division  
4300 Cherry Creek Drive South, APCD-SS-B1  
Denver, Colorado 80246-1530

**SUBJECT: City & County of Denver DEN Production Facilities  
Submittal of Leak Detection and Repair (LDAR) Annual Report Form**

Via electronically by email to: [cdphe\\_reg7LDAR\\_annualreports@state.co.us](mailto:cdphe_reg7LDAR_annualreports@state.co.us)

Ladies/Gentlemen:

The City and County of Denver (CCD) is submitting the required LDAR annual report form for 2015 per requirements outlined under Regulation 7, XVII.F.9. The 2015 annual report is due to the Division by May 31, 2016. All monitoring was conducted in accordance with requirements outlined under XVII.F. A FLIR camera was used to perform the required approved instrument monitoring method (AIMM) inspections. Documentation of identified leaks and repairs are maintained by CCD's contract operator, Petro Pro Engineering (PPE).

In 2015, two (2) facilities were subject to quarterly LDAR monitoring and monthly audio, visual, olfactory (AVO) inspections. CCD is committed to APCD's policy to minimize emissions to the extent reasonably practicable through operation and maintenance activities. As such, PPE has elected to have operators include AVO inspections as part of their daily facility inspection check list. Per Section 7.1 of PS Memo 14-04, only the count of required monthly AVO inspections (12 per year) is included on the report.

Facilities subject to one-time LDAR monitoring frequency (26 facilities) were also inspected in 2015 to comply with the requirement completion by January 1, 2016 under XVII.F.4.b. These facilities are subject to AVO inspections beginning January 1, 2016 and are therefore not included in 2015 reporting.

LDAR and AVO inspections conducted in 2015 identified 25 leaks. All leaks were repaired and re-monitored to confirm the repair was successfully made in accordance with requirements under XVII.F.7. Records will be maintained for the required two (2) years and are available upon request.

If you should need any additional information or have any questions please contact me at (303) 342-2508, Irina Tenenbaum at (303) 342-2743, or you can contact Lesair Environmental at (303) 904-2525.

Sincerely,

A handwritten signature in blue ink, appearing to read "Francisco Alonzo", written over a horizontal line.

Francisco Alonzo  
Director of Commercial Property

cc: PetroPro Engineering, Inc.



# Leak Detection and Repair (LDAR) Annual Report Form<sup>1</sup>



Please submit via email to: [cdphe\\_reg7LDAR\\_annualreports@state.co.us](mailto:cdphe_reg7LDAR_annualreports@state.co.us)

## Section 1: General Information

Company Name:	City and County of Denver		
Inspection Year:	2015	# Facilities Inspected: <sup>2</sup>	28
Contact Person:	Julie Branting	Title:	Operator
Phone Number:	303-638-7484	E-mail Address:	petropro@comcast.net

## Section 2: LDAR Inspections

Inspection Method	# Inspections <sup>3</sup>
AIMM at Natural Gas Compressor Stations:	0
AIMM at Well Production Facilities:	34
AVO at Well Production Facilities:	24
<b>TOTAL</b>	<b>58</b>

## Section 3: Leaking Components Details

Component Type	# Leaks Identified <sup>4</sup>	# Leaks Repaired	# Leaks on Delay of Repair List as of Dec 31
Valves:	7	7	0
Connectors:	12	12	0
Flanges:	1	1	0
Pump Seals:	0	0	0
Pressure Relief Devices:	5	5	0
<b>TOTAL</b>	<b>25</b>	<b>25</b>	<b>0</b>

## Section 4: Responsible Official Certification

All information contained in the LDAR Annual Report must be certified by a responsible official as defined in Colorado Regulation No. 3, Part A, Section 1.B.38.

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

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

Printed/Typed Name - Responsible Official:	Title:
Francisco Alonzo	Director of Business Development, Denver Interl Airport
Signature:	Date:

**Section 5: Additional Notes**

This report covers a total of 28 facilities. Two of these facilities were subject to quarterly LDAR and monthly AVO inspections beginning 1/1/2015. LDAR inspections were performed at these two facilities for all four quarters of 2015. CCD operators have elected to make AVO inspections a part of their daily facility inspection check list. AVO inspections are reported as the maximum required frequency of once per month as required under XVII.F.4.c (12 per year). The remaining 26 facilities were subject to a one-time facility AIMM to be completed by 1/1/2016. The one-time LDAR inspection of the 26 facilities was completed during the third quarter of 2015. AVO inspections are not required at these facilities until 1/1/2016. Note that thief hatch seal leaks were counted under the pressure relief device category. The valve category includes controllers and regulators.

**Section 6: Facilities Inspected**

Addendum Table 1		
Plant AIRS ID (e.g., 123/7896)	Location (e.g., Lat/Long)	Facility Name
001/1567	39.90153/-104.72218	Champlin 117 C Battery <i>(quarterly)</i>
031/2020	39.89016/-104.60255	DIA 7-22,12-44,18-24 <i>(quarterly)</i>
001/1873	39.88428/-104.71521	BOX ELDER A-1 & B-1
031/2054	39.88764/-104.63629	Box Elder C-1
031/2055	39.89468/-104.62562	Box Elder C-2
031/2056	39.88065/-104.62603	Box Elder D-2
031/1969	39.88934/-104.61513	Box Elder L-1
001/1862	39.87986/-104.58909	CE Smith 1
031/2058	39.89490/-104.66183	Champlin 125 F/J Battery
031/2057	39.87952/-104.64687	Champlin 75 E Battery
031/2022	39.89291/-104.63992	DIA 10-44,11-22,11-44
031/2158	39.87159/-104.61916	DIA 13-33
031/2043	39.88202/-104.63674	DIA 14-22
031/1934	39.86713/-104.62544	DIA 23-11
N/A	39.86494/-104.62840	DIA 23-13
031/1933	39.86679/-104.63562	DIA 23-25
031/1936	39.86128/-104.63341	DIA 23-31
031/2044	39.86119/-104.62512	DIA 23-41
001/1458	39.86471/-104.62135	DIA 24-23
001/1690	39.82662/-104.63127	DIA 3-24
031/2021	39.88539/-104.67082	DIA 4-44
001/1863	39.81420/-104.62338	Jeff Drohan 2-16 & UPRR 1-13
001/1864	39.80318/-104.62542	Liberty 1 Battery
031/2066	39.88737/-104.65575	Monaghan 1 Battery
031/2059	39.90437/-104.67191	Morris-Letterly Battery
031/2060	39.88405/-104.60952	Pugh 41-13 #2 Battery
031/2061	39.88640/-104.59975	UPRR 23 Pan Am F-1 Battery
001/1757	39.90410/-104.70957	WINN 1 & 2

Footnotes:

<sup>1</sup> The fields shaded in blue are mandatory required elements of the annual report. The remaining information is voluntary and requested to help the Division better interpret the implementation of the leak detection and repair program.

<sup>2</sup> "# of Facilities Inspected" should reflect the total number of unique physical locations (e.g. well production facilities and natural gas compressor stations) inspected during the calendar year reported.

<sup>3</sup> The "Total # of Inspections" should reflect the number of unique facility inspections events (e.g. unique complete facility AVO and AIMM events) that occurred across all facilities (as reflected in Section 1) monitored by the company during the calendar year reporting period. This number should not reflect a count representing the number of individual component(s) monitored. In addition, re-monitoring events to verify an earlier identified leak has been repaired as required by Regulation 7, Section XVII.F.7 should not be counted in the "Total # of Inspections" reported.

<sup>4</sup> The "# of Leaks Identified" should reflect the sum total of component leaks identified during all facility inspections (e.g. AVO and AIMM) that occurred during the calendar year reported.