



Dedicated to protecting and improving the health and environment of the people of Colorado

Mr. Robert Kester  
Rebellion Photonics  
7547 South Fwy  
Houston, TX 77021

January 15, 2015 - via electronic and United States Mail

Re: Approval of Request for the Gas Cloud Imager to be an Approved Instrument Monitoring Method for Colorado Air Quality Control Commission (AQCC) Regulation No. 7 STEM and LDAR Requirements

Dear Mr. Kester:

The Air Pollution Control Division ("Division") has reviewed your request dated October 15, 2014 regarding the application of a proposed Approved Instrument Monitoring Method (AIMM) for purposes of AQCC Regulation No. 7 Storage Tank Emission Management (STEM) and Leak Detection and Repair (LDAR) requirements. In your submittal, you provided a full application, along with sufficient supplemental information received on November 14 and December 1, 2014, for the Division to issue an approval letter. Therefore, the Division hereby approves the use of the Gas Cloud Imager (GCI) as AIMM with the additional conditions of approval, as outlined below.

AQCC Regulation No. 7 §XVII.A.2 states that any AIMM approved by the Division must be capable of detecting leaks as defined in §XVII.F.6. Please refer to Regulation No. 7 §XVII.C.2. for the STEM requirements and §XVII.F.1. - XVII.F.7 for the LDAR requirements.

The Division has determined that the application and supplemental information submitted has met the minimum requirements for approval of the GCI as AIMM. The GCI has been determined to meet the Non-Quantitative Classification. Please review the following section of Regulation No. 7: §XVII.F.6.c. for Non-Quantitative requirements for terms of use under the classification.

The result of the application review has determined the following conditions of approval for the GCI also have to be met to be covered by this approval letter:

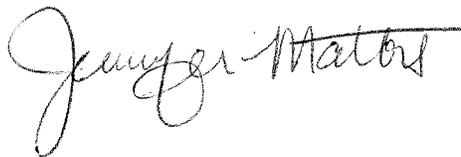
1. The GCI may only be operated by certified and trained Rebellion employees.
2. The operator must follow the operating and maintenance plan and emission leak/vent tracking and recording procedures submitted to the Division in the application.
3. The operator must be able to produce certification or training documentation demonstrating competency in using the GCI.
4. The operator must be able to produce a copy of this letter for inspection by the Division or local agency personnel.
5. The maximum distance that the GCI is approved to be utilized for Regulation No. 7 monitoring purposes is 200 feet.
6. Only the GCI is covered by this approval letter.

**For the facilities subject to Title V Operating Permit requirements:** Division approved AIMM (other than infra-red camera or EPA Method 21) must be documented within each Title V Operating Permit. A complete Title V modification application or revision to a previously submitted application must be submitted by any facility wishing to use the GCI prior to implementation.



Please note that the Division is making this determination based on a reliance on the validity and accuracy of the information that Rebellion Photonics provided in its submittal. Please do not hesitate to contact me at 303-692-3144 or [jennifer.mattox@state.co.us](mailto:jennifer.mattox@state.co.us) if you have any questions regarding this letter or would like to further discuss this approval. Thank you.

Sincerely,



Jennifer Mattox  
Enforcement Supervisor, Oil and Gas Team  
Stationary Sources Program  
Colorado Air Pollution Control Division  
APCD-SS-B1

cc:

Mr. Mark McMillan - APCD, via electronic mail  
Ms. Shannon McMillan - APCD, via electronic mail  
Ms. Amy Allen, Rebellion Photonics, via electronic mail

