

# DRAFT STATE OF COLORADO

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
AIR POLLUTION CONTROL DIVISION  
TELEPHONE: (303) 692-3150



## CONSTRUCTION PERMIT

PERMIT NO: **14PO1437**

**Issuance 1**

DATE ISSUED:

ISSUED TO: **TriStar Global Vapor Control**

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Portable thermal oxidizer for use during tank degassing and cleaning at multiple sites in Colorado, home-based at 12600 North Featherwood, Suite 330, in Houston, Texas.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

AIRS Point	Description
001	Portable LPG-fired thermal oxidizer for reduction of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions during tank degassing and cleaning at multiple sites in Colorado: Make: Mako Industries Model: 4000 CFM Makotherm (DG) Serial Number: MIM298 Design Rate: 4000 scfm, 8 MMBtu/hr

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR POLLUTION PREVENTION AND CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS INCLUDED IN THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

### REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL

1. **YOU MUST notify the Air Pollution Control Division (Division) no later than fifteen days after commencement of operation under this permit by submitting a Notice of Startup (NOS) form to the Division.** The Notice of Startup (NOS) form may be downloaded online at <https://www.colorado.gov/pacific/cdphe/other-air-permitting-notice>. Failure to notify the Division of startup of the permitted source is a violation of AQCC Regulation No. 3, Part B, Section III.G.1 and can result in the revocation of the permit.
2. Within one hundred and eighty days (180) after commencement of operation, compliance with the conditions contained on this permit shall be demonstrated to the Division. It is the permittee's responsibility to self certify compliance with the conditions. Failure to demonstrate compliance within 180 days may result in revocation of the permit or enforcement action by the Division. Information on how to certify compliance was mailed with the permit or can be obtained from the

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

Division's website at <https://www.colorado.gov/pacific/cdphe/air-permit-self-certification>. (Reference: Regulation No. 3, Part B, III.G.2).

3. This permit shall expire if the owner or operator of the source for which this permit was issued: (i) does not commence construction/modification or operation of this source within 18 months after either, the date of issuance of this construction permit or the date on which such construction or activity was scheduled to commence as set forth in the permit application associated with this permit; (ii) discontinues construction for a period of eighteen months or more; (iii) does not complete construction within a reasonable time of the estimated completion date. The Division may grant extensions of the deadline per Regulation No. 3, Part B, III.F.4.b. (Reference: Regulation No. 3, Part B, III.F.4.)
4. Within one hundred and eighty days (180) after commencement of operation, the operator shall complete all initial compliance testing and sampling as required in this permit and submit the results to the Division as part of the self-certification process. (Reference: Regulation No. 3, Part B, Section III.E.)
5. The owner or operator shall develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. **Compliance with the O&M plan shall commence at startup.** Within one hundred and eighty days (180) after commencement of operation, the owner or operator shall submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. (Reference: Regulation No. 3, Part B, III.E.)
6. Within thirty (30) days after commencement of operation, the AIRS ID number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)

## **EMISSION LIMITATIONS AND RECORDS**

7. Emissions of air pollutants shall not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). Monthly records of the actual emission rates shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation No. 3, Part B, Section II.A.4)

### **Monthly Limits:**

AIRS Point	Tons per Month			Emission Type
	VOC	NO <sub>x</sub>	CO	
001	3.3	0.3	0.6	Point

The monthly limits included in this permit were derived from the annual limits based on a 31-day month. The owner or operator shall calculate monthly emissions based on the calendar month.

For facilities that are not a major source:

Facility-wide emissions of each individual hazardous air pollutant shall be less than 1,358.9 pounds per month.

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

Facility-wide emissions of total hazardous air pollutants shall be less than 3,397.3 pounds per month.

**Annual Limits:**

AIRS Point	Tons per Year			Emission Type
	VOC	NO <sub>x</sub>	CO	
001	39.0	3.1	6.8	Point

See "Notes to Permit Holder #4" for information on emission factors and methods used to calculate limits.

For facilities that are not a major source:

Facility-wide emissions of each individual hazardous air pollutant shall be less than 8.0 tpy. Compliance with the annual limits shall be determined by recording the facility's annual emissions for all HAPs above the de minimus reporting level on a rolling twelve (12) month total.

Facility-wide emissions of total hazardous air pollutants shall be less than 20.0 tpy. Compliance with the annual limits shall be determined by recording the facility's annual emissions for all HAPs above the de minimus reporting level on a rolling twelve (12) month total.

During the first twelve (12) months of operation, compliance with both the monthly and yearly emission limitations shall be required. After the first twelve (12) months of operation, compliance with only the yearly limitation shall be required.

Compliance with the annual limits shall be determined by recording the facility's annual emissions for the pollutants listed in the table above on a rolling twelve (12) month total. By the end of each month a new twelve-month total shall be calculated based on the previous twelve months' data. The permit holder shall calculate monthly emissions and keep a compliance record on site, or at a local field office with site responsibility, for Division review.

- The following control equipment shall be maintained and operated to ensure satisfactory performance. The uncontrolled emissions shall be reduced by at least the control efficiencies listed below. The owner or operator shall monitor compliance with this condition through the results of approved compliance tests (when required), compliance with the Operating and Maintenance Plan, compliance records, and other methods as approved by the Division. (Reference: Regulation No. 3, Part B, Section III.E.)

AIRS Point	Control Device	Controlled Pollutants	Control Efficiency
001	Thermal Oxidizer	VOC & HAPs	96.0%

**PROCESS LIMITATIONS AND RECORDS**

- This source shall be limited to the following maximum consumption, processing and/or operational rates as listed below. Monthly records of the actual process rate shall be maintained

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

by the applicant and made available to the Division for inspection upon request. (Reference: Regulation 3, Part B, II.A.4)

### Consumption Limits

<b>AIRS Point</b>	<b>Process Parameter</b>	<b>Annual Limit</b>	<b>Monthly Limit (31 days)</b>
<b>001</b>	Consumption of LPG	327,624 gal/yr	27,825.6 gal/month

The monthly limits included in this permit were derived from the annual limits based on a 31-day month. The owner or operator shall calculate monthly emissions based on the calendar month.

During the first twelve (12) months of operation, compliance with both the monthly and yearly process limitations shall be required. After the first twelve (12) months of operation, compliance with only the yearly limitation shall be required.

Compliance with the yearly process limits shall be determined on a rolling twelve (12) month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months' data. The permit holder shall calculate monthly process rate and keep a compliance record on site or at a local field office with site responsibility, for Division review.

## **STATE REGULATORY REQUIREMENTS**

10. Visible emissions shall not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity shall be determined using EPA Method 9. (Reference: Regulation No. 1, Section II.A.1. & 4.)
11. This source is subject to the odor requirements of Regulation No. 2. (State only enforceable)
12. When relocating this equipment the owner or operator shall (Reference: Regulation No. 3, Part A, Section II.C.1.f and Part B, Section III.E.):
  - a. Submit a Relocation Notice each time this equipment is moved to a new location. The Relocation Notice shall be received by the Division at least ten (10) days prior to the change in location.

The Relocation Notice shall include a facility emission inventory that includes all emission units at the new location. An ambient air quality impact analysis for the site shall be submitted with the Relocation Notice for this equipment if so requested by the Division.
  - b. Maintain records of compliance with all additional requirements that are triggered by the relocation. Such requirements may include, but are not limited to:
    - (1) State or Federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT), and Generally Available Control Technology (GACT) requirements; and

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

- (2) Major source requirements, including Title V Operating Permit, Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD) program requirements; and
    - (3) Permitting requirements for sources no longer permit exempt due to the relocation of this unit to the site (i.e. previously Air Pollutant Emission Notice (APEN) required, permit exempt sources).
  - c. Keep a record of all relocation notices submitted to the Division.
13. This unit shall not remain at any one site for more than two (2) years. Permittee shall keep records of time spent at each site (Reference: Regulation No. 3, Part A, I.B.36.). If this unit remains at a site for two years then the permittee shall submit a revised Air Pollutant Emission Notice (APEN) requesting a permit as a non-portable stationary source.  
  
Note: If this replaces a unit and is intended to perform the same function as the unit being replaced then the cumulate time for both units, including the time between removal of the original unit and installation of the replacement unit, will be counted toward the total time spent at the site.
14. If this source relocates to a site causing the facility to become Title V Operating Permit major (see Regulation No. 3, Part A, I.B.25.) or relocates to an existing Title V Permitted source then this source is subject to the provisions of Regulation No. 3, Part C, Operating Permits (Title V of the 1990 Federal Clean Air Act Amendments). The application for the Operating Permit, or modification for inclusion in the existing Operating Permit, is due within one year of the date of relocation to the site.
15. This source is located in an ozone non-attainment or attainment-maintenance area and subject to the Reasonably Available Control Technology (RACT) requirements of Regulation Number 3, Part B, III.D.2. The requirements of condition number 8 above were determined to be RACT for this source.

## **OPERATING & MAINTENANCE REQUIREMENTS**

16. The owner or operator shall develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. **Compliance with the O&M plan shall commence at startup.** Within one hundred and eighty days (180) after commencement of operation, the owner or operator shall submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. (Reference: Regulation No. 3, Part B, III.E.)

## **COMPLIANCE TESTING AND SAMPLING**

### **Initial Testing Requirements**

17. A source initial compliance test shall be conducted on the thermal oxidizer during the degassing and cleaning of an above ground storage tank that is storing material that contains VOC and HAPs to measure the emission rate(s) for the pollutants listed below in order to demonstrate compliance with the control efficiency listed in condition number 8. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No compliance test shall be conducted without prior approval from the Division. Any compliance test conducted to show compliance with a monthly or annual emission limitation shall have the results projected up to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time (Reference: Regulation No. 3, Part B., Section III.G.3)

Volatile Organic Compounds using EPA approved methods.  
Hazardous Air Pollutants using EPA approved methods.

## **ADDITIONAL REQUIREMENTS**

18. The AIRS ID number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)
19. A Revised Air Pollutant Emission Notice (APEN) shall be filed: (Reference: Regulation No. 3, Part A, Section II.C.)

- a. Annually whenever a significant increase in emissions occurs as follows:

### **For any criteria pollutant:**

For sources emitting **less than 100 tons per year**, a change in actual emissions of five tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NO<sub>x</sub>) sources in an ozone non-attainment area emitting **less than 100 tons of VOC or nitrogen oxide per year**, a change in actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted; or

For sources emitting **100 tons per year or more of a criteria pollutant**, a change in actual emissions of five percent or 50 tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting **any amount of lead**, a change in actual emissions, above the level reported on the last APEN submitted, of fifty (50) pounds of lead

### **For any non-criteria reportable pollutant:**

If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.

- b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
- c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or
- d. Whenever a permit limitation must be modified; or
- e. No later than 30 days before the existing APEN expires.

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

- 20. The requirements of Colorado Regulation No. 3, Part D shall apply at such time that any stationary source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation that was established after August 7, 1980, on the capacity of the source or modification to otherwise emit a pollutant such as a restriction on hours of operation (Colorado Regulation No. 3, Part D, Section VI.B.4 or V.A.7.B).

With respect to this Condition, Part D requirements may apply to future modifications if emission limits are modified to equal or exceed the following threshold levels:

AIRS Point	Equipment Description	Pollutant	Emissions (tons per year)	
			Threshold	Current Permit Limit
001	Thermal Oxidizer	VOC	100, 250, or 40 depending on facility	39.0

### **GENERAL TERMS AND CONDITIONS:**

- 21. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation No. 3, Part B, Section II.B upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
- 22. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit is considered initial approval and does not provide "final" approval for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and AQCC Regulation No. 3, Part B, Section III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the Requirements to Self-Certify for Final Approval section of this permit.** The operator shall retain the permit final approval letter issued by the Division after completion of self-certification with the most current construction permit.
- 23. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity specifically identified on the permit.

By: \_\_\_\_\_ By: \_\_\_\_\_  
 Renee Lee R K Hancock III, P.E.  
 Permit Engineer Construction Permits Unit Supervisor

#### **Permit History**

Issuance	Date	Description
Issuance 1	This Issuance	Issued to TriStar Global Vapor Control

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

Notes to Permit Holder (as of date of permit issuance):

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the production/processing rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedence of any specific emission control regulation or any ambient air quality standard. A revised air pollutant emission notice (APEN) and application form must be submitted with a request for a permit revision.
  
- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee shall notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the Common Provisions Regulation. See: <https://www.colorado.gov/pacific/cdphe/aqcc-regs>.
  
- 3) The following emissions of non-criteria reportable air pollutants are estimated based upon the process limits as indicated in this permit. This information is listed to inform the operator of the Division's analysis of the specific compounds emitted if the source(s) operate at the permitted limitations.

AIRS Point	Pollutant	CAS #	Uncontrolled Emission Rate (lb/yr)	Are the emissions reportable?	Controlled Emission Rate (lb/yr)
001	Benzene	71432	4,466	YES	179
	Toluene	108883	20,001	YES	800
	Ethylbenzene	100414	5,437	YES	15
	Xylene	1330207	8,544	YES	24
	Hexane	110543	17,476	YES	49

- 4) The emission levels contained in this permit are based on the following emission factors:

Process emissions from tank degassing:

Pollutant	Uncontrolled Emission Factor	Emission Factor Source	Control Device	Control Efficiency
VOC	n/a	EPA TANKS 4.0.9d	Thermal Oxidizer	96.0%
Benzene	Assume = 0.23% of VOC	EPA Speciates Profile #1100 - Refueling (benzene updated based on newer information)		
Toluene	Assume = 1.03% of VOC			
Ethylbenzene	Assume = 0.28% of VOC			
Xylene	Assume = 0.44% of VOC			
Hexane	Assume = 0.90% of VOC			

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

Emissions from LPG combustion as supplemental fuel:

Pollutant	Uncontrolled Emission Factor (lb/1000gal)	Emission Factor Source	Control Device	Control Efficiency
NOx	13.0	AP-42 Table 1.5-1	None	0%
CO	7.5			
VOC	1.0			

Emissions from process stream combustion:

Pollutant	Uncontrolled Emission Factor (lb/MMBtu)	Emission Factor Source	Control Device	Control Efficiency
NOx	0.068	AP-42 Table 13.5-1	None	0%
CO	0.37			

- 5) In accordance with C.R.S. 25-7-114.1, each Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years from the date it was received by the Division. A revised APEN shall be submitted no later than 30 days before the five-year term expires. Please refer to the most recent annual fee invoice to determine the APEN expiration date for each emissions point associated with this permit. For any questions regarding a specific expiration date call the Division at (303)-692-3150.
- 6) This facility is classified as follows:

Applicable Requirement	Status
Operating Permit	Synthetic Minor Source of VOC & HAPs
PSD	Synthetic Minor Source of VOC
NANSR	Synthetic Minor Source of VOC

- 7) The permit holder is required to pay fees for the processing time for this permit. An invoice for these fees will be issued after the permit is issued. The permit holder shall pay the invoice within 30 days of receipt of the invoice. Failure to pay the invoice will result in revocation of this permit (Reference: Regulation No. 3, Part A, Section VI.B.)
- 8) Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the provisions of Section 25-7-114.5(7)(a), C.R.S.
- 9) Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof shall constitute a rejection of the entire permit and upon such occurrence, this permit shall be deemed denied *ab initio*. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action.

TriStar Global Vapor Control  
Permit No. 14PO1437  
Issuance 1

- 10) Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollutant Emission Notice (APEN) must **pay an annual fee** to cover the costs of inspections and administration. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
  
- 11) Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.

# DRAFT STATE OF COLORADO

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT  
AIR POLLUTION CONTROL DIVISION  
TELEPHONE: (303) 692-3150



## CONSTRUCTION PERMIT

PERMIT NO: **14PO1438**

**Issuance 1**

DATE ISSUED:

ISSUED TO: **TriStar Global Vapor Control**

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Portable thermal oxidizer for use during tank degassing and cleaning at multiple sites in Colorado, home-based at 12600 North Featherwood, Suite 330, in Houston, Texas.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

AIRS Point	Description
001	Portable LPG-fired thermal oxidizer for reduction of volatile organic compound (VOC) and hazardous air pollutant (HAP) emissions during tank degassing and cleaning at multiple sites in Colorado: Make: Mako Industries Model: 2000 CFM Makotherm (DG) Serial Number: MIM1445 Design Rate: 2000 scfm, 4 MMBtu/hr

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR POLLUTION PREVENTION AND CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS INCLUDED IN THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

### REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL

1. **YOU MUST notify the Air Pollution Control Division (Division) no later than fifteen days after commencement of operation under this permit by submitting a Notice of Startup (NOS) form to the Division.** The Notice of Startup (NOS) form may be downloaded online at <https://www.colorado.gov/pacific/cdphe/other-air-permitting-notice>. Failure to notify the Division of startup of the permitted source is a violation of AQCC Regulation No. 3, Part B, Section III.G.1 and can result in the revocation of the permit.
2. Within one hundred and eighty days (180) after commencement of operation, compliance with the conditions contained on this permit shall be demonstrated to the Division. It is the permittee's responsibility to self certify compliance with the conditions. Failure to demonstrate compliance within 180 days may result in revocation of the permit or enforcement action by the Division. Information on how to certify compliance was mailed with the permit or can be obtained from the

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

Division's website at <https://www.colorado.gov/pacific/cdphe/air-permit-self-certification>. (Reference: Regulation No. 3, Part B, III.G.2).

3. This permit shall expire if the owner or operator of the source for which this permit was issued: (i) does not commence construction/modification or operation of this source within 18 months after either, the date of issuance of this construction permit or the date on which such construction or activity was scheduled to commence as set forth in the permit application associated with this permit; (ii) discontinues construction for a period of eighteen months or more; (iii) does not complete construction within a reasonable time of the estimated completion date. The Division may grant extensions of the deadline per Regulation No. 3, Part B, III.F.4.b. (Reference: Regulation No. 3, Part B, III.F.4.)
4. Within one hundred and eighty days (180) after commencement of operation, the operator shall complete all initial compliance testing and sampling as required in this permit and submit the results to the Division as part of the self-certification process. (Reference: Regulation No. 3, Part B, Section III.E.)
5. The owner or operator shall develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. **Compliance with the O&M plan shall commence at startup.** Within one hundred and eighty days (180) after commencement of operation, the owner or operator shall submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. (Reference: Regulation No. 3, Part B, III.E.)
6. Within thirty (30) days after commencement of operation, the AIRS ID number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)

## **EMISSION LIMITATIONS AND RECORDS**

7. Emissions of air pollutants shall not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). Monthly records of the actual emission rates shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation No. 3, Part B, Section II.A.4)

### **Monthly Limits:**

AIRS Point	Tons per Month			Emission Type
	VOC	NO <sub>x</sub>	CO	
001	3.3	0.3	0.6	Point

The monthly limits included in this permit were derived from the annual limits based on a 31-day month. The owner or operator shall calculate monthly emissions based on the calendar month.

For facilities that are not a major source:

Facility-wide emissions of each individual hazardous air pollutant shall be less than 1,358.9 pounds per month.

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

Facility-wide emissions of total hazardous air pollutants shall be less than 3,397.3 pounds per month.

**Annual Limits:**

AIRS Point	Tons per Year			Emission Type
	VOC	NO <sub>x</sub>	CO	
001	39.0	3.1	6.8	Point

See "Notes to Permit Holder #4" for information on emission factors and methods used to calculate limits.

For facilities that are not a major source:

Facility-wide emissions of each individual hazardous air pollutant shall be less than 8.0 tpy. Compliance with the annual limits shall be determined by recording the facility's annual emissions for all HAPs above the de minimus reporting level on a rolling twelve (12) month total.

Facility-wide emissions of total hazardous air pollutants shall be less than 20.0 tpy. Compliance with the annual limits shall be determined by recording the facility's annual emissions for all HAPs above the de minimus reporting level on a rolling twelve (12) month total.

During the first twelve (12) months of operation, compliance with both the monthly and yearly emission limitations shall be required. After the first twelve (12) months of operation, compliance with only the yearly limitation shall be required.

Compliance with the annual limits shall be determined by recording the facility's annual emissions for the pollutants listed in the table above on a rolling twelve (12) month total. By the end of each month a new twelve-month total shall be calculated based on the previous twelve months' data. The permit holder shall calculate monthly emissions and keep a compliance record on site, or at a local field office with site responsibility, for Division review.

- The following control equipment shall be maintained and operated to ensure satisfactory performance. The uncontrolled emissions shall be reduced by at least the control efficiencies listed below. The owner or operator shall monitor compliance with this condition through the results of approved compliance tests (when required), compliance with the Operating and Maintenance Plan, compliance records, and other methods as approved by the Division. (Reference: Regulation No. 3, Part B, Section III.E.)

AIRS Point	Control Device	Controlled Pollutants	Control Efficiency
001	Thermal Oxidizer	VOC & HAPs	96.0%

**PROCESS LIMITATIONS AND RECORDS**

- This source shall be limited to the following maximum consumption, processing and/or operational rates as listed below. Monthly records of the actual process rate shall be maintained

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

by the applicant and made available to the Division for inspection upon request. (Reference: Regulation 3, Part B, II.A.4)

### Consumption Limits

<b>AIRS Point</b>	<b>Process Parameter</b>	<b>Annual Limit</b>	<b>Monthly Limit (31 days)</b>
<b>001</b>	Consumption of LPG	327,624 gal/yr	27,825.6 gal/month

The monthly limits included in this permit were derived from the annual limits based on a 31-day month. The owner or operator shall calculate monthly emissions based on the calendar month.

During the first twelve (12) months of operation, compliance with both the monthly and yearly process limitations shall be required. After the first twelve (12) months of operation, compliance with only the yearly limitation shall be required.

Compliance with the yearly process limits shall be determined on a rolling twelve (12) month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months' data. The permit holder shall calculate monthly process rate and keep a compliance record on site or at a local field office with site responsibility, for Division review.

## **STATE REGULATORY REQUIREMENTS**

10. Visible emissions shall not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity shall be determined using EPA Method 9. (Reference: Regulation No. 1, Section II.A.1. & 4.)
11. This source is subject to the odor requirements of Regulation No. 2. (State only enforceable)
12. When relocating this equipment the owner or operator shall (Reference: Regulation No. 3, Part A, Section II.C.1.f and Part B, Section III.E.):
  - a. Submit a Relocation Notice each time this equipment is moved to a new location. The Relocation Notice shall be received by the Division at least ten (10) days prior to the change in location.

The Relocation Notice shall include a facility emission inventory that includes all emission units at the new location. An ambient air quality impact analysis for the site shall be submitted with the Relocation Notice for this equipment if so requested by the Division.
  - b. Maintain records of compliance with all additional requirements that are triggered by the relocation. Such requirements may include, but are not limited to:
    - (1) State or Federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT), and Generally Available Control Technology (GACT) requirements; and

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

- (2) Major source requirements, including Title V Operating Permit, Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD) program requirements; and
    - (3) Permitting requirements for sources no longer permit exempt due to the relocation of this unit to the site (i.e. previously Air Pollutant Emission Notice (APEN) required, permit exempt sources).
  - c. Keep a record of all relocation notices submitted to the Division.
13. This unit shall not remain at any one site for more than two (2) years. Permittee shall keep records of time spent at each site (Reference: Regulation No. 3, Part A, I.B.36.). If this unit remains at a site for two years then the permittee shall submit a revised Air Pollutant Emission Notice (APEN) requesting a permit as a non-portable stationary source.  
  
Note: If this replaces a unit and is intended to perform the same function as the unit being replaced then the cumulate time for both units, including the time between removal of the original unit and installation of the replacement unit, will be counted toward the total time spent at the site.
14. If this source relocates to a site causing the facility to become Title V Operating Permit major (see Regulation No. 3, Part A, I.B.25.) or relocates to an existing Title V Permitted source then this source is subject to the provisions of Regulation No. 3, Part C, Operating Permits (Title V of the 1990 Federal Clean Air Act Amendments). The application for the Operating Permit, or modification for inclusion in the existing Operating Permit, is due within one year of the date of relocation to the site.
15. This source is located in an ozone non-attainment or attainment-maintenance area and subject to the Reasonably Available Control Technology (RACT) requirements of Regulation Number 3, Part B, III.D.2. The requirements of condition number 8 above were determined to be RACT for this source.

## **OPERATING & MAINTENANCE REQUIREMENTS**

16. The owner or operator shall develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. **Compliance with the O&M plan shall commence at startup.** Within one hundred and eighty days (180) after commencement of operation, the owner or operator shall submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. (Reference: Regulation No. 3, Part B, III.E.)

## **COMPLIANCE TESTING AND SAMPLING**

### **Initial Testing Requirements**

17. A source initial compliance test shall be conducted on the thermal oxidizer during the degassing and cleaning of an above ground storage tank that is storing material that contains VOC and HAPs to measure the emission rate(s) for the pollutants listed below in order to demonstrate compliance with the control efficiency listed in condition number 8. The test protocol must be in accordance with the requirements of the Air Pollution Control Division Compliance Test Manual

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

and shall be submitted to the Division for review and approval at least thirty (30) days prior to testing. No compliance test shall be conducted without prior approval from the Division. Any compliance test conducted to show compliance with a monthly or annual emission limitation shall have the results projected up to the monthly or annual averaging time by multiplying the test results by the allowable number of operating hours for that averaging time (Reference: Regulation No. 3, Part B., Section III.G.3)

Volatile Organic Compounds using EPA approved methods.  
Hazardous Air Pollutants using EPA approved methods.

## **ADDITIONAL REQUIREMENTS**

18. The AIRS ID number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)
19. A Revised Air Pollutant Emission Notice (APEN) shall be filed: (Reference: Regulation No. 3, Part A, Section II.C.)

- a. Annually whenever a significant increase in emissions occurs as follows:

### **For any criteria pollutant:**

For sources emitting **less than 100 tons per year**, a change in actual emissions of five tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NO<sub>x</sub>) sources in an ozone non-attainment area emitting **less than 100 tons of VOC or nitrogen oxide per year**, a change in actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted; or

For sources emitting **100 tons per year or more of a criteria pollutant**, a change in actual emissions of five percent or 50 tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting **any amount of lead**, a change in actual emissions, above the level reported on the last APEN submitted, of fifty (50) pounds of lead

### **For any non-criteria reportable pollutant:**

If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.

- b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
- c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or
- d. Whenever a permit limitation must be modified; or
- e. No later than 30 days before the existing APEN expires.

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

- 20. The requirements of Colorado Regulation No. 3, Part D shall apply at such time that any stationary source or modification becomes a major stationary source or major modification solely by virtue of a relaxation in any enforceable limitation that was established after August 7, 1980, on the capacity of the source or modification to otherwise emit a pollutant such as a restriction on hours of operation (Colorado Regulation No. 3, Part D, Section VI.B.4 or V.A.7.B).

With respect to this Condition, Part D requirements may apply to future modifications if emission limits are modified to equal or exceed the following threshold levels:

AIRS Point	Equipment Description	Pollutant	Emissions (tons per year)	
			Threshold	Current Permit Limit
001	Thermal Oxidizer	VOC	100, 250, or 40 depending on facility	39.0

### **GENERAL TERMS AND CONDITIONS:**

- 21. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation No. 3, Part B, Section II.B upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
- 22. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit is considered initial approval and does not provide "final" approval for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and AQCC Regulation No. 3, Part B, Section III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the Requirements to Self-Certify for Final Approval section of this permit.** The operator shall retain the permit final approval letter issued by the Division after completion of self-certification with the most current construction permit.
- 23. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity specifically identified on the permit.

By: \_\_\_\_\_ By: \_\_\_\_\_  
 Renee Lee R K Hancock III, P.E.  
 Permit Engineer Construction Permits Unit Supervisor

### **Permit History**

Issuance	Date	Description
Issuance 1	This Issuance	Issued to TriStar Global Vapor Control

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

Notes to Permit Holder (as of date of permit issuance):

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the production/processing rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedence of any specific emission control regulation or any ambient air quality standard. A revised air pollutant emission notice (APEN) and application form must be submitted with a request for a permit revision.
- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee shall notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the Common Provisions Regulation. See: <https://www.colorado.gov/pacific/cdphe/aqcc-regs>.
- 3) The following emissions of non-criteria reportable air pollutants are estimated based upon the process limits as indicated in this permit. This information is listed to inform the operator of the Division's analysis of the specific compounds emitted if the source(s) operate at the permitted limitations.

AIRS Point	Pollutant	CAS #	Uncontrolled Emission Rate (lb/yr)	Are the emissions reportable?	Controlled Emission Rate (lb/yr)
001	Benzene	71432	4,466	YES	179
	Toluene	108883	20,001	YES	800
	Ethylbenzene	100414	5,437	YES	15
	Xylene	1330207	8,544	YES	24
	Hexane	110543	17,476	YES	49

- 4) The emission levels contained in this permit are based on the following emission factors:

Process emissions from tank degassing:

Pollutant	Uncontrolled Emission Factor	Emission Factor Source	Control Device	Control Efficiency
VOC	n/a	EPA TANKS 4.0.9d	Thermal Oxidizer	96.0%
Benzene	Assume = 0.23% of VOC	EPA Speciates Profile #1100 - Refueling (benzene updated based on newer information)		
Toluene	Assume = 1.03% of VOC			
Ethylbenzene	Assume = 0.28% of VOC			
Xylene	Assume = 0.44% of VOC			
Hexane	Assume = 0.90% of VOC			

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

Emissions from LPG combustion as supplemental fuel:

Pollutant	Uncontrolled Emission Factor (lb/1000gal)	Emission Factor Source	Control Device	Control Efficiency
NOx	13.0	AP-42 Table 1.5-1	None	0%
CO	7.5			
VOC	1.0			

Emissions from process stream combustion:

Pollutant	Uncontrolled Emission Factor (lb/MMBtu)	Emission Factor Source	Control Device	Control Efficiency
NOx	0.068	AP-42 Table 13.5-1	None	0%
CO	0.37			

- 5) In accordance with C.R.S. 25-7-114.1, each Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years from the date it was received by the Division. A revised APEN shall be submitted no later than 30 days before the five-year term expires. Please refer to the most recent annual fee invoice to determine the APEN expiration date for each emissions point associated with this permit. For any questions regarding a specific expiration date call the Division at (303)-692-3150.
- 6) This facility is classified as follows:

Applicable Requirement	Status
Operating Permit	Synthetic Minor Source of VOC & HAPs
PSD	Synthetic Minor Source of VOC
NANSR	Synthetic Minor Source of VOC

- 7) The permit holder is required to pay fees for the processing time for this permit. An invoice for these fees will be issued after the permit is issued. The permit holder shall pay the invoice within 30 days of receipt of the invoice. Failure to pay the invoice will result in revocation of this permit (Reference: Regulation No. 3, Part A, Section VI.B.)
- 8) Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the provisions of Section 25-7-114.5(7)(a), C.R.S.
- 9) Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof shall constitute a rejection of the entire permit and upon such occurrence, this permit shall be deemed denied *ab initio*. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action.

TriStar Global Vapor Control  
Permit No. 14PO1438  
Issuance 1

- 10) Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollutant Emission Notice (APEN) must **pay an annual fee** to cover the costs of inspections and administration. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
  
- 11) Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.