

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
Division or Section of APCD/Stationary Sources Program

INTER-OFFICE COMMUNICATION

TO: CP Engineers

FROM: Dennis M. Myers

DATE: June 10, 1998

RE: **PS Memo 98-004** Processing of final approval permits

This memo supersedes PPM #72 which was issued on July 9, 1985. The following procedure should be followed when processing a permit for final approval:

1. Recalculate emissions based on most current emission factors. If emissions are lower than on IA, do not change emission levels. If emissions are higher, then emission levels will need to be changed on the FA. If the higher emission levels trigger an applicable requirement, such as major mod., NSPS, etc. that was not previously triggered please let your unit supervisor know. Also see PS96-007 for more discussion on emission factor increases as they relate to final approval permits.
2. Remove short term emission limits and short term production limits where possible. Please check modeling to make sure that source was modeled at design rate. If the source was modeled at design rate, and there are no ambient issues, short term limits may be removed unless there is a regulatory basis for the short term limit (NSPS, Reg. 7, etc.- see PS Memo 98-3 for more detail on this). If there is a regulatory basis for the limit, then it should remain in the permit with the appropriate averaging time, as stated in the standard.

For fugitive sources such as gravel pits, a daily production limit will still be required, since there is no way to establish a design rate for such type of sources. The daily production limit should be determined based on modeling the source with the latest available model (currently SCREEN 3), and after factoring in the background concentration, scaling up the results to 150 ug/m³. For example, if a gravel pit was modeled at 5,000 tpd production, and the 24 hour impact was 75 ug/m³, and the background is 25ug/m³, then the final permit should be issued with a daily production limit of 8,333 tpd. This number was determined by multiplying 5,000 tpd by $(150-25)/75$, in order to scale up the modeling results to a total impact including background of 150 ug/m³.

3. Please be sure to check to see if Reg. 6, Part B applies to the source. If so, then stdcon 21 should be added to the final permit to incorporate the Part B requirements.
4. Review the file to check for any notes, correspondence, etc. that should be considered during the FA review. Also review the self certification forms and routing sheets carefully, and makes changes as appropriate. Please make sure that compliance plans (if required) have been approved by enforcement staff.
5. Check to make sure that all applicable requirements (Reg. 7, NSPS, opacity requirements, etc.) were included on the initial approval. If an applicable requirement was left out during the IA process, please let your unit supervisor know. This will need to be handled on a case-by-case basis.
6. Remove any unnecessary conditions, such as rolling total requirements on true minors, Reg.7 conditions on sources in attainment areas, stdcon 20 for sources not subject to Reg.6, Part A or B requirements, etc. Please note the reason for removing these conditions in your PA.
7. When redrafting the final approval permit conditions, please use the current standard condition permit wording found in K:\stdcons.
8. Informational notes, such as standard conditions 80 through 90, should be added to the final approval permit. However, in general, no new conditions should be added to the final permit. If you have any questions on whether a condition should be added, please see your unit supervisor. Conditions such as stdcon 3 (manufacturer model, serial no. requirement) can be removed, since this information should have been provided, and incorporated into equipment description.
9. Preliminary analysis summary sheet should be completed describing the emission changes calculated, and the changes made to the permit. Please show all calculations and make sure that explanations of why changes were made are clear. Remember that clear and accurate documentation is very important so that others can more easily follow what was done.
10. Complete (or update) the emission tracking sheet for all sources at the facility. The impact summary sheet should be placed on top of the APEN's in the front of the master file.
11. Check AIRS and Connie for all sources at the facility to ensure completeness and accuracy.
12. Complete the attached checklist.

Final Approval Review Checklist

- Check and review file, correspondence, self certification, compliance plan etc., for changes and incorporate as appropriate.
- Recalculate emissions based on latest emission factors.
- Check modeling to see if it shows compliance at design rate.
- For fugitive sources, determine daily production limit that results in daily impact of 150 ug/m³, and limit source to that daily production rate.
- Determine if all applicable requirements (Reg. 7, NSPS, etc.) have been included. If a requirement was left out, or a new applicable requirement is triggered (based on recalculated emissions), notify supervisor.
- Remove any unnecessary conditions and document reason why in PA.
- Determine if Reg. 6, Part B applies, and if so, then use stdcon 21 to include requirements.
- Draft final approval permit with current standard permit conditions found in K:\stdcons.
- Remove short term limits where appropriate. (No modeling issues and no regulatory basis for short term limit)
- Include informational notes (stdcons 80-90), however in general, do not add new conditions to the final permit.
- Complete preliminary analysis sheet.
- Complete or update emission tracking sheet.
- Check Connie for accuracy - correct as necessary.
- Save permit to the K:\permits subdirectory.

NOTES: