



GENERAL CONSTRUCTION PERMIT

Oil and Gas Industry Hydrocarbon Liquid Loadout

Permit Number GP07 Version 2

Final Approval

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Note: See the Hydrocarbon Liquid Loadout Guidance document (PS Memo 14-02) for further information on definitions, and emission calculation guidelines.



I. General Permit Applicability

- I.A. Qualified Sources: The owner or operator of any oil and gas industry (exploration and production (E&P), non-E&P, midstream and downstream) operation that can comply with all of the operating conditions described in Section II of this permit and meet all of the requirements in this Section may register for this general permit. This general permit covers the following:
- I.A.1. Hydrocarbon liquid loading operations, including condensate loading, crude oil loading and dual product loading containing commingled hydrocarbon and produced water.
 - I.A.2. Combustion devices, vapor recovery units, vapor balance, or other Division approved control equipment used to reduce emissions from loading operations.
 - I.A.3. Equipment as described in Conditions I.A.1 and I.A.2 located at a true minor source synthetic minor source for Operating Permit (OP), New Source Review (NSR), and Maximum Achievable Control Technology (MACT) program applicability, except as provided for in I.A.4 below.
 - I.A.4. Stationary Sources that become subject to Title V Operating Permit requirements or become classified as an existing major stationary source for which a complete GP-07 registration request is received by the division prior to the effective date (January 27, 2020) on which the Denver-Boulder-Greeley-Ft. Collins-Loveland ozone nonattainment area (the Denver Ozone Nonattainment Area) was re- classified from moderate to serious may continue to operate under this General Permit.
- I.B. Excluded Sources: The following sources may not register for this general permit:
- I.B.1. This general permit applies only to the equipment as described in Section I.A above. Other equipment at the same stationary source must be permitted separately as required by Regulation No. 3, Part B.
 - I.B.2. Newly constructed or modified existing equipment that is part of a project permit action that is subject to Non-Attainment New Source Review (NA NSR) or Prevention of Significant Deterioration (PSD) permitting under Regulation 3, Part D



- II.B.5. Hydrocarbon liquid loading to truck tanks must be conducted by submerged fill. (Reference: Regulation 3, Part B, III.E)
- II.B.6. The owner or operator must follow loading procedures that minimize the leakage of VOCs to the atmosphere including, but not limited to (Reference: Regulation 3, Part B, III.E):
 - II.B.6.a. Hoses, couplings, and valves must be maintained to prevent dripping, leaking, or other liquid or vapor loss during loading and unloading.
 - II.B.6.b. All compartment hatches (including thief hatches) must be closed and latched at all times when loading operations are not active, except for periods of maintenance, gauging, or safety of personnel and equipment.
 - II.B.6.c. The owner or operator must inspect loading equipment and operations onsite at the time of inspections to monitor compliance with Part II.B.6 (a) and (b) above. The inspections must occur at least monthly. Each inspection must be documented in a log available to the Division on request.
- II.B.7. All hydrocarbon liquid loading operations, regardless of size, must be designed, operated and maintained so as to minimize leakage of volatile organic compounds to the atmosphere to the maximum extent practicable. (Reference: Regulation 3, Part B, III.E)

III. Alternative Operating Scenario (AOS)

- III.A. Provided that the emission limits set forth in Section II.A. are still met, the owner or operator may invoke an AOS for the following modifications to an existing loading operation registered under the general permit without modifying the general permit registration:
 - III.A.1. Increase in throughput resulting in a facility classification change.
 - III.A.2. Addition or replacement of control equipment by different type.
 - III.A.3. Relocation of the loading operation within the same quarter-quarter section, township, and range.
- III.B. The owner or operator must record in a log the date and description of any modification made under the provisions of this AOS. This log must be maintained



contemporaneously with any changes made under the AOS (Reference: Regulation No. 3, Part A, Section IV.A.1.)

- III.C. If exercising the AOS, a revised APEN should be submitted by April 30th of the year following the modification. The revised APEN must be accompanied by the appropriate APEN filing fee and a cover letter detailing all such AOS modifications that occurred within the previous calendar year.
- III.D. The following changes are not considered modifications and are not subject to Condition III.C provided that none of the modifications listed in Section III.A occurred within the same calendar year. These changes should be reflected in any revised APEN required by Condition VI.A.1.
 - III.D.1. Changes in throughput not resulting in a facility classification change.
 - III.D.2. Routine maintenance and repair.
 - III.D.3. Changes in facility emissions resulting in a facility classification change
 - III.D.4. Replacement of control technology by same type of control technology.

IV. **Operating and Maintenance Plan**

- IV.A. Flares must be enclosed, have no visible emissions, and be designed so that an observer can, by means of visual observation from the outside of the enclosed flare, or by other convenient means approved by the Division, determine whether the flare is operating properly.
- IV.B. If a control device is used to comply with the emission limits of this permit the following conditions must be met:
 - IV.B.1. Control devices must be adequately designed, and operated and maintained according to manufacturer specifications to achieve a control efficiency of at least 95%, and to handle reasonably foreseeable fluctuations in emissions of VOCs.
 - IV.B.2. The owner or operator must monitor and document the proper operation of the control device. Time intervals between monitoring must not exceed 14 days. Indications of improper operation for a flare include, but are not limited to, absence of pilot light, malfunction of electronic ignition, and/or presence of smoke. A check box is suitable for recording proper operation. Improper operation of a control device must be further documented with a description of the problem and its resolution, the date range the control was inoperable, and

the loading throughput during the downtime. During control device downtime, emissions must be considered to be uncontrolled.

- IV.B.3. The owner or operator of a facility at which vapor balancing is used to control emissions must:
- IV.B.3.a. Install and operate the vapor collection and return equipment to collect vapors during loading of tank compartments of outbound transport trucks and return these vapors to the stationary source storage tanks.
 - IV.B.3.b. Include devices to prevent the release of vapor from vapor recovery hoses not in use.
 - IV.B.3.c. Use operating procedures to ensure that hydrocarbon liquid cannot be transferred unless the vapor collection equipment is in use.
 - IV.B.3.d. Operate all recovery and disposal equipment at a back pressure less than the pressure relief valve setting of transport vehicles.
 - IV.B.3.e. Inspect thief hatch seals annually for integrity and replace as necessary. Thief hatch covers must be weighted and properly seated.
 - IV.B.3.f. Inspect pressure relief devices (PRD) annually for proper operation and replace as necessary. PRDs must be set to release at a pressure that will ensure flashing, working and breathing losses are routed to the control device under normal operating conditions.
 - IV.B.3.g. Document annual inspections of thief hatch seals and PRD with an indication of status, a description of any problems found, and their resolution.

V. **Recordkeeping Plan**

- V.A. Records must be maintained on-site or at a local field office with stationary source responsibility for Division review. Records may be kept in either electronic format or hard copy provided that they can be promptly supplied to the Division upon its request. All records must be retained for a period of five years.
- V.B. The following records must be maintained for this emission point:
- V.B.1. The current version of this general construction permit.

- V.B.2. The most recently submitted APEN
- V.B.3. The general permit registration approval letter.
- V.B.4. Records that clearly demonstrate compliance with the emission limits of this permit. This must include the most currently available loading throughput records necessary to calculate emissions in accordance with this Condition V.B.4 and documentation of all periods of control device downtime.
 - V.B.4.a. For sources located at a true minor facility, compliance with the emission limits in Section II.A must be determined by calculating the annual emissions from each emission unit for the calendar year.
 - V.B.4.b. For sources located at synthetic minor or major facilities, compliance with the emission limits in Section II.A must be determined by recording the annual emissions from each emission unit on a rolling (12) month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months' data. During the first year of operation, compliance must be assumed providing that cumulative emissions from all months of operation do not exceed the emission limits in Section II.A.
 - V.B.4.c. Records required by Conditions II.B.6.c (General operating conditions), III.B (AOS), IV.B.2 (Control device monitoring) and IV.B.3.g (Annual inspections), as applicable.

VI. **General Permit Terms and Administration**

- VI.A. A facility that is classified as a major source for Title V Operating Permit requirements and is operating under Condition I.A.4 must submit an application to incorporate the terms of this general permit into the Operating Permit. The due date for this application is one year from the date on which the facility becomes subject to Title V Operating Permit requirements.
- VI.B. In accordance with Colorado Regulation No. 3, Part C, Section V.C.5, some or all of the monitoring specified in this general permit will be incorporated as specific conditions in the source's Title V Operating Permit (if applicable). Additional monitoring not listed in this general permit may be included in the source's Operating Permit in order to satisfy the periodic monitoring requirements of Section V.C.5.b.
- VI.C. General Terms

- VI.C.1. A revised APEN shall be filed: (Reference: Regulation No. 3, Part A, Section II.C.)
- VI.C.1.a. Annually by April 30th of the year following a significant increase in emissions as follows:
 - VI.C.1.a.(i) For VOC, a change in actual emissions of five (5) tons per year or more, above the level reported on the last APEN; or
 - VI.C.1.a.(ii) For volatile organic compounds and nitrogen oxides sources in ozone non-attainment areas, a change in annual actual emissions of one ton per year or more or five percent, whichever is greater, above the level reported on the last APEN submitted to the Division; or
 - VI.C.1.a.(iii) 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.
 - VI.C.1.b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
 - VI.C.1.c. As required by the alternative operating scenario allowed by Section III.
 - VI.C.1.d. No later than 30 days before the existing APEN expires.
- VI.C.2. 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, Sections VI.B.4 and/or V.A.7.b).
- VI.C.3. Sources covered by this General Permit are subject to the Common Provisions Regulation Part II, Subpart E, Upset Conditions and Breakdowns. The owner or operator must notify the Division of any upset 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 Division's next working day, followed by written notice to the Division explaining the cause of the occurrence and that proper action has been or is being taken to correct the conditions causing said violation and to prevent such excess emission in the future.



- VI.C.4. 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 and specific terms and conditions included in this document.
 - VI.C.5. 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.
 - VI.C.6. 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.
 - VI.C.7. Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollution Emission Notice (APEN) must pay an annual fee to cover the costs of inspections and administration.
 - VI.C.8. 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.
 - VI.C.9. Registration under this permit is approved in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon 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 general permit registration.
- VI.D. Registration Revision / Termination
- VI.D.1. The Division may deny or revoke registration under the general permit under the circumstances specified in Regulation No. 3, Part B, Section III.I.3.c.
 - VI.D.2. A registration under this general permit may be reissued to a new owner or in a new company name by the Division as provided in Regulation No. 3, Part B, Section II.B. upon a request for transfer of ownership or company name change and the submittal of a revised APEN and the required fees.



- VI.D.3. Registration under this general permit is voluntary. The owner or operator may withdraw or cancel a registration under this general permit at any time by notifying the Division in writing.

VI.E. General Permit Revision / Termination

- VI.E.1. This general permit remains in effect until revised or terminated by the Division in accordance with the provisions of Regulation No. 3.
- VI.E.2. After public notice and comment as provided by Regulation No. 3, Part B, Section III.I.7., the Division may revise this general permit in order to add or delete requirements or limitations to the permit. This public notice shall be conducted in a manner consistent with the provisions of Regulation No. 3, Part B, Section III.C.4.
- VI.E.3. If a revised general permit is issued by the Division, any existing registration to use the general permit will be automatically converted to a registration to use the revised general permit, and the owner or operator is subject to requirements of the revised general permit. Persons not wishing to continue coverage under the revised general permit shall have the option of applying for an individual permit as required by Regulation No. 3, Part B.
- VI.E.4. If the Division terminates this general permit, it will provide written notice to affected registrants prior to the termination of the general permit. The notice will advise registrants that they must apply for an individual permit as required by Regulation No. 3, Part B.
- VI.E.5. The Division may require any source authorized by a general construction permit to apply for and obtain an individual permit if circumstances have changed since the time of the original general permit application so that the source is no longer appropriately controlled and/or permitted under the general construction permit. (Reference: Regulation No. 3, Part B, Section III.I.3.c.(i)(B))

VI.F. General Permit Registration Approval Process

- VI.F.1. Conditional certification of a registration under this general permit is effective from the date the complete registration request is received by the APCD. A complete registration request consists of all General Permit application materials required by the APCD. The owner or operator may commence construction and operation of the hydrocarbon liquid loading as represented in the registration upon receipt of the completed registration request by the APCD. In the event the hydrocarbon liquid loading operation(s) does not



qualify for registration under the general permit the owner or operator accepts the liability of commencing these activities.

- VI.F.2. The APCD will determine completeness of the General Permit registration request within sixty (60) days of the date of receipt of the request and provide written notification to the applicant. If the applicant does not receive notification of a completeness determination from the APCD within sixty (60) days, the General Permit registration request shall be deemed complete for the purpose of Condition VI.F.1.
- VI.F.3. The APCD has ninety (90) calendar days from the date the APCD receives a complete General Permit registration request to provide the applicant with a written approval or denial of the registration.

Permit History

Issuance	Date	Description
Issuance 1	17 April 2014	Initial issuance
Issuance 2	This Issuance	Revised to address the Denver ozone nonattainment area re-classification from moderate to serious