



1391 N Speer Blvd, Ste 350, Denver, CO 80204 / P 720.638.7647 / trinityconsultants.com

October 15, 2024

Stationary Sources Program
Air Pollution Control Division
APCD-SS-B1
1999 Broadway
Denver, CO 80202
cdphe_apcd_ssp_application@state.co.us

RE: Novva GP-06 Construction Permit Application – AIRS ID 041-1620

Dear Kenneth Houlden,

Novva Colorado, LLC is submitting this general permit (GP-06) application to the Colorado Department of Public Health & Environment (CDPHE) for the proposed installation of three new stationary emergency generators at their Colorado Springs facility. This letter outlines the background of the project, engine information, and a regulatory applicability determination.

Project Background

Novva Colorado, LLC (Novva) operates a facility in Colorado Springs with three existing permit exempt emergency engines (AIRS IDs 041-1620-001, 041-1620-002, and 041-1620-003). Novva is proposing to install three additional emergency engines to supplement the existing engines. Each of the three new emergency generators will be equipped with 2,200 kW MTU engines with Selective Catalytic Reduction (SCR) to control NO_x emissions. Each engine will not exceed 500 hours per year, and the engines will only perform testing and maintenance during the hours of 8 am and 5 pm. Twice per year, the facility will conduct 15-minute tests during which all generators will run at once. All other maintenance and testing will be done with only one generator in operation at a time.

The calculations were performed using manufacturer and AP-42 emission factors, and the emissions are summarized in Table 1 below. The application forms are included as attachments to this letter. Please find the emission calculations for the new engines, manufacturer's specifications, and EPA emissions certification in Attachment C.

Table 1. Summary of Emissions

	Pollutant (tpy)								
	PM ₁₀	PM _{2.5}	TSP	NO _x	VOC	CO	SO ₂	HAPs	GHG
Existing Emergency Generators PTE	2.75	2.75	2.75	48.02	1.17	1.73	0.03	0.03	2,745.27
Proposed Emergency Generators PTE	0.44	0.44	0.44	2.71	0.68	7.16	0.02	0.03	2,624.33
Post Project Site Wide PTE ¹	3.19	3.19	3.19	50.73	1.85	8.89	0.04	0.05	5,369.60
APEN Threshold ²	2	2	2	2	2	2	2	0.13	--
Permit Threshold ³	5	2	10	10	5	10	10	--	--
GP-06 Threshold ⁴	--	--	--	90	90	90	--	--	--
Title V Operating Permit Levels (tpy) ^{5,6}	100	100	100	100	100	100	100	10	--
Project Emissions Exceed APEN Thresholds?	No	No	No	Yes	No	Yes	No	No	No
Facility Emissions Exceed GP-06 Threshold?	No	No	No	No	No	No	No	No	No
Facility Emissions Exceed Title V Operating Permit Levels?	No	No	No	No	No	No	No	No	No

1. Post Project Site Wide PTE (tpy) = Potential Emissions per Engine (tpy) * Number of Engines (including the three existing and three proposed engines)

2. APEN Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

3. Permit Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

4. GP-06 Threshold come from the Emission Limitation Requirements for ILA.1, as the facility is located outside of the Denver ozone nonattainment area.

5. Part 70 source levels come from the definition of Major Source in 40 CFR 70.2 and Colorado Regulation No. 3, Part A, Section I.B.25.

6. Note that the relevant threshold for HAPs is 25 tpy total HAPs or 10 tpy of any individual HAP.

Regulatory Review

Based on the requested up to 500 hours per year per engine, the proposed new engines are above the APEN and permitting thresholds for NO_x. The engines qualify for the GP-06 General Permit as they are diesel fuel-fired Reciprocating Internal Combustion Engines (RICE) at a minor source with the facility emissions for NO_x, CO, and VOC below 90 tpy each (per facility emission requirements outlined in II.A.2 of GP-06).

Owners and operators of diesel engines (non-fire pump engines) manufactured after April 1, 2006 are subject to New Source Performance Standards Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines, which requires:

- ▶ Usage of a certified engine (per 40 CFR 60.4205(b) and 60.4211(c))
- ▶ Operation and maintenance of the engine in accordance with the manufacturer's instructions (per 40 CFR 60.4206 and 60.4211(a))
- ▶ The emergency engine must be equipped with a non-resettable hour meter if not certified to meet non-emergency standards (per 40 CFR 60.4209(a))
- ▶ A limit of 100 hr/yr for non-emergency maintenance and testing purposes with up to 50 of the hours for non-emergency usage (per 40 CFR 60.4211(f))
- ▶ Ultra low sulfur diesel (ULSD) with a maximum sulfur content of 15 ppm is required to be purchased after October 1, 2010 (40 CFR 60.4207(b))

Since the new diesel engines will be at an area source (minor source) of hazardous air pollutants, per 40 CFR 63.6590(c)(1), Novva will also satisfy the requirements of the National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, 40 CFR 63 Subpart ZZZZ, for the diesel engines by complying with NSPS Subpart IIII.

Summary

Novva appreciates CDPHE's review of the construction permitting application for three new emergency engines. If you have any questions, or need further information, please do not hesitate to contact me at (720) 638-7647 ext. 5601 or via email at avjones@trinityconsultants.com. Alternatively, please feel free to reach out to Anthony Gustin with Novva at (385) 415-9065 or via email at a.gustin@novva.com.

Sincerely,
Trinity Consultants

A handwritten signature in cursive script that reads "Ashley Jones".

Ashley Jones

Attachment A: Application Fee

Attachment B: Air Pollutant Emissions Notices (APENs)

Attachment C: Emission Calculations and Supporting Documentation

Attachment D: Modeling Determination Form APCD-114

Attachment E: Facility Emissions Inventory

Attachment F: Flow Diagram and Plot Plan

Attachment G: Environmental Justice Report & CDPHE Concurrence



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

Permit Application/Registration Checklist Form APCD-100

- A complete permit application must include the documentation outlined in this form unless otherwise noted.
- If the permit application does not include the required documentation, it may be rejected.
- Filing fees for permit applications that are rejected due to incompleteness will not be refunded.
- Certain types of emission sources may require additional forms. Refer to the Division's [APENs and air permits webpage](#) to see whether any APEN supplement forms are required for your source.
- If the application is for a major NANSR or PSD permit, send eight (8) total copies.

Company Name: Novva Colorado, LLC

Facility/Site Name(s): Colorado Springs

What type of permit coverage is requested by this application?

- ☐ Traditional construction permit
☒ General permit (e.g. GP01, GP03, etc.)

Are you requesting (an) individual or facility-wide permit(s)?

- ☒ Individual permit(s) covering (a) single emissions point(s).
☐ Facility-wide permit covering multiple emissions points.

Check one box in each section of the following table to certify that the referenced documentation is included with the permit application. Do not check more than one box per section unless otherwise noted.

Section	Description of Required Permit Application Element
A	☒ The relevant filing fee(s) are being submitted with this application, or were already submitted.
B	☒ This application contains the relevant Air Pollutant Emission Notice(s). (APCD Form Series 200)
C	☒ This application contains relevant emission calculations and supporting documentation.
D	☐ This application contains company contact information documentation. (Form APCD-101)
	☒ There is only a single point of contact for this application. (Form APCD-101 is not required.)

(Checklist continued on next page)

Required Permit Application Element Checklist (continued):

E	<u>Environmental Justice Documentation</u> ☒ A complete Environmental Justice (EJ) Summary for this project was submitted prior to this application, and was reviewed and verified by the Division. The verification number for this EJ Summary is _____. EJ Concurrence (attached) received prior to verification number system. ☐ This application is exempt from EJ Summary requirements for the following reason(s), per Colorado Regulation Number 3, Part B, Section III.B.5.e. (check all that apply): ☐ This application is only for an administrative permit amendment. (Section III.B.5.e.(i)) ☐ This application requests an overall decrease or no change in the facility-wide annual emission limits of NO_x, VOC, PM_{2.5}, and BTEX pollutants. (Section III.B.5.e.(ii)) ☐ This application is for a modification at an existing source of emissions, and an up-to-date EJ Summary was already verified by the Division on _____. (Section III.B.5.e.(iii))
F	<u>Ambient Air Impact Analysis Documentation</u> ☐ This application is exempt from modeling determination requirements for the following reason(s), per the document Permitting Section Addendum to the Modeling Guideline (2/21/2024) (check all that apply): ☐ “No Emission Increases or ‘Pure Decreases’ in a Permit Modification” (Section 2.1) ☐ “Only VOC Increases” (Section 2.2) ☐ “APEN-exempt and Permit-exempt Emission Sources” (Section 2.3) ☐ “Land Development Projects Requesting Coverage Under a General Permit (GP03)” (Section 2.4) ☒ A request for modeling determination for the project(s) included in this application has been submitted, and the Division determined that additional modeling was not required. This application contains the version of the modeling determination request that was <u>reviewed and approved by the Division.</u> (Form APCD-114) ☐ This application is for a traditional construction permit, and a modeling analysis for the project(s) included in this application has been submitted, but not yet approved by the Division. ☐ A modeling analysis for the project(s) included in this application has been approved by the Division. This application contains any relevant documentation of this approval, including the submitted modeling analysis and the Division’s modeling review comments which document compliance with the NAAQS and the conditions of approval for the proposed project(s). ☐ This application is for a traditional construction permit, and a NAAQS monitoring plan is being submitted with this application, or has already been submitted. If this monitoring plan has already been reviewed and approved by the Division, this application contains the plan itself and documentation of plan approval.

(Checklist continued on next page)

Required Permit Application Element Checklist (continued):

G	General Permit Monitoring Compliance Documentation	
	☒ This application is: A) requesting coverage under a traditional construction permit, and/or B) the emission source(s) contained in this application are not located in a Disproportionately Impacted (DI) Community.	
	(For the following three options) This application is requesting coverage under a general permit, the emission source(s) contained in this application are located in a Disproportionately Impacted (DI) Community, and:	
	☐ This source will comply with source-specific monitoring requirements as outlined in Regulation Number 3, Part B, Section III.J.2.	
	☐ This source will pay community monitoring fees as outlined in Regulation Number 3, Part B, Section III.J.3.	
☐ This source will comply with well production facility monitoring requirements as outlined in Regulation Number 3, Part B, Section III.J.4.		
☐ This source is not subject to Regulation Number 3, Part B, Sections III.J.2., III.J.3, or III.J.4.		
H	☒ This application contains a facility-wide emissions inventory. (Form APCD-102 for oil & gas sources, or form APCD-102a for non-oil & gas sources)	
I	☒ This application contains a process description, flow diagram, and plot plan of the emissions unit and/or facility, as relevant.	
J	☐ This application contains the relevant Operating & Maintenance (O&M) Plan documentation. (APCD Form Series 300)	
	☒ This application is: A) for a true minor source of emissions, and/or B) for an emissions source that is not associated with the oil & gas industry, and/or C) requesting coverage under a general permit. (APCD Form Series 300 is not required.)	

Applicant Certification:

I hereby certify that all information contained herein and information submitted with this application is complete, true, and correct.

Anthony Gustin

Signature of Legally Authorized Person (not a vendor or consultant)

10/17/2024

Date

Anthony Gustin

Name (print)

Director of Microgrid Systems

Title

Send the application with all required information/documentation (including this form) and any applicable fees to:

CDPHE - Air Pollution Control Division
 APCD-SS-B1
 4300 Cherry Creek Drive South
 Denver, CO 80246-1530

Attachment A
Application Fee

Attachment B
Air Pollutant Emissions Notices (APENs)

Attachment C
Emission Calculations and Supporting Documentation

Table 1. Summary of Emissions

	Pollutant (tpy)								
	PM ₁₀	PM _{2.5}	TSP	NO _x	VOC	CO	SO ₂	HAPs	GHG
Existing Emergency Generators PTE	2.75	2.75	2.75	48.02	1.17	1.73	0.03	0.03	2,745.27
Proposed Emergency Generators PTE	0.44	0.44	0.44	2.71	0.68	7.16	0.02	0.03	2,624.33
Post Project Site Wide PTE ¹	3.19	3.19	3.19	50.73	1.85	8.89	0.04	0.05	5,369.60
APEN Threshold ²	2	2	2	2	2	2	2	0.13	--
Permit Threshold ³	5	2	10	10	5	10	10	--	--
GP-06 Threshold ⁴	--	--	--	90	90	90	--	--	--
Title V Operating Permit Levels (tpy) ^{5,6}	100	100	100	100	100	100	100	10	--
Project Emissions Exceed APEN Thresholds?	No	No	No	Yes	No	Yes	No	No	No
Facility Emissions Exceed GP-06 Threshold?	No	No	No	No	No	No	No	No	No
Facility Emissions Exceed Title V Operating Permit Levels?	No	No	No	No	No	No	No	No	No

1. Post Project Site Wide PTE (tpy) = Potential Emissions per Engine (tpy) * Number of Engines (including the three existing and three proposed engines)

2. APEN Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

3. Permit Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

4. GP-06 Threshold come from the Emission Limitation Requirements for II.A.1. as the facility is located outside of the Denver ozone nonattainment area.

5. Part 70 source levels come from the definition of Major Source in 40 CFR 70.2 and Colorado Regulation No. 3, Part A, Section I.B.25.

6. Note that the relevant threshold for HAPs is 25 tpy total HAPs or 10 tpy of any individual HAP.

Table 2. Key Parameters/Constants for Existing Emergency Generator Engine Emission Calculations

Parameter	Value	Unit
Engine Power(@1800 rpm) ¹	3,196	bhp
Annual Hours	500	hrs/yr
Number of Engines	3	Engines

1. Engine Power per manufacturer specifications.

Table 3. Emission Factors

Pollutant	Value	Unit
VOC ¹	1.56	lb/hr
NO _x ¹	64.02	lb/hr
CO ¹	2.30	lb/hr
PM	0.52	g/hp-hr
PM ₁₀ ¹	0.52	g/hp-hr
PM _{2.5} ¹	0.52	g/hp-hr
SO _x ²	5.50E-03	g/hp-hr

1. NO_x, CO, PM, and VOC emission factors per manufacturer specifications. It is assumed that the hydrocarbons (HC) are entirely VOCs.

2. The engine will use ultra low sulfur diesel fuel. The emission factor is based on a fuel sulfur content of 0.0015% for ultra low sulfur diesel fuel, as defined under 40 CFR 80, Subpart I, Section 80.510(c)(1). The SO₂ emission factor from AP-42 Section 3.4, Table 3.4-1 (10/96) was used.

3. Conversion from g/hp-hr to g/kW-hr: 1 g/kW-hr = 0.75 g/hp-hr

Table 4. HAP Emissions per Engine

Pollutant	Emission Factor		Hourly PTE (lb/hr) ³	Annual PTE	
	(lb/MMBtu) ¹	(lb/hp-hr) ²		(lb/yr) ⁴	(tpy)
Benzene	7.76E-04	5.43E-06	1.74E-02	8.68	4.34E-03
Toluene	2.81E-04	1.97E-06	6.29E-03	3.14	1.57E-03
Xylenes	1.93E-04	1.35E-06	4.32E-03	2.16	1.08E-03
Formaldehyde	7.89E-05	5.52E-07	1.77E-03	0.88	4.41E-04
Acetaldehyde	2.52E-05	1.76E-07	5.64E-04	0.28	1.41E-04
Acrolein	7.88E-06	5.52E-08	1.76E-04	0.09	4.41E-05
Naphthalene	1.30E-04	9.10E-07	2.91E-03	1.45	7.27E-04
Acenaphthylene	9.23E-06	6.46E-08	2.06E-04	0.10	5.16E-05
Acenaphthene	4.68E-06	3.28E-08	1.05E-04	0.05	2.62E-05
Fluorene	1.28E-05	8.96E-08	2.86E-04	0.14	7.16E-05
Phenanthrene	4.08E-05	2.86E-07	9.13E-04	0.46	2.28E-04
Anthracene	1.23E-06	8.61E-09	2.75E-05	0.01	6.88E-06
Fluoranthene	4.03E-06	2.82E-08	9.02E-05	0.05	2.25E-05
Pyrene	3.71E-06	2.60E-08	8.30E-05	0.04	2.08E-05
Benzo(a)anthracene	6.22E-07	4.35E-09	1.39E-05	0.01	3.48E-06
Chrysene	1.53E-06	1.07E-08	3.42E-05	0.02	8.56E-06
Benzo(b)fluoranthene	1.11E-06	7.77E-09	2.48E-05	1.24E-02	6.21E-06
Benzo(k)fluoranthene	2.18E-07	1.53E-09	4.88E-06	2.44E-03	1.22E-06
Benzo(a)pyrene	2.57E-07	1.80E-09	5.75E-06	2.87E-03	1.44E-06
Indeno(1,2,3-cd)pyrene	4.14E-07	2.90E-09	9.26E-06	4.63E-03	2.32E-06
Dibenz(a,h)anthracene	3.46E-07	2.42E-09	7.74E-06	3.87E-03	1.94E-06
Benzo(g,h,i)perylene	5.56E-07	3.89E-09	1.24E-05	6.22E-03	3.11E-06
Total HAPs per Engine:			3.52E-02	17.60	0.01
Total HAPs All Engines:			1.06E-01	52.80	0.03

1. HAP Emission Factors per AP-42 Chapter 3.4, Table 3.4-3 and Table 3.4-4 (10/96)

2. Conversion from Btu to hp-hr: 1 hp-hr =

7000 Btu per AP-42 Chapter 3-4, Table 3.4-1 (10/96).

3. Hourly PTE (lbs/hr) = Emission Factor (g/hp-hr) * Engine Power (bhp)

4. Annual PTE (lbs/yr) = Hourly Emissions (lb/hr) * Annual Hours (hrs/yr)

Table 5. Potential Emissions per Engine

Pollutant	Hourly PTE (lb/hr) ¹	Annual PTE	
		(lb/yr) ²	(tpy)
VOC	1.6	780.0	0.39
NO _x	64.0	32,010.0	16.01
CO	2.3	1,150.0	0.58
PM	3.7	1,832.0	0.92
PM ₁₀	3.7	1,832.0	0.92
PM _{2.5}	3.7	1,832.0	0.92
SO _x	0.0	19.4	0.01
HAP	0.0	17.6	0.01

1. Hourly PTE (lb/hr) = Emission Factor (g/hp-hr) * Engine Power (bhp) / 453.592 (grams/lb)

2. Annual PTE (lb/year) = Hourly Emissions (lb/hr) * Annual Hours (hr/year)

Table 6. Greenhouse Gas Potential to Emit per Engine

Pollutant	Global Warming Potential ¹	Emission Factor (kg/MMBtu) ²	CO ₂ e emissions	
			(lb/yr) ³	(tpy)
CO ₂	1.0	74.0	1,823,921	911.96
CH ₄	25.0	3.00E-03	1,850	0.92
N ₂ O	298.0	6.00E-04	4,409	2.20
Total CO2e Emissions per Engine (tpy):				915.09
Total CO2e Emissions All Engines (tpy):				2,745.27

1. Global Warming Potentials are obtained from Subpart A of 40 CFR 98, Table A-1 "Global Warming Potentials."

2. Emission factor for carbon dioxide is obtained from 40 CFR 98, Table C-1 to Subpart C for Distillate Fuel Oil No. 2. Emission factors for methane and nitrous oxide are obtained from 40 CFR 98, Table C-2 to Subpart C.

3. CO₂e Potential Emissions (lb/year) = GWP * Emission Factor (kg/MMBtu) * 1000 (g/kg) * 7,000 (Btu/hp-hr) / 1,000,000 (Btu/MMBtu) * Annual Hours (hr/year) * Engine Power (bhp) / 453.592 (grams/lb)

4. Conversion from Btu to hp-hr: 1 hp-hr = 7000 Btu per AP-42 Chapter 3-3, Table 3.4-1 (10/96).

Table 7. Total Emissions for all Existing Engines

Pollutant	Hourly PTE (lb/hr)	Annual PTE	
		(lb/yr)	(tpy)
VOC	4.7	2,340.0	1.17
NO _x	192.1	96,030.0	48.02
CO	6.9	3,450.0	1.73
PM	11.0	5,495.9	2.75
PM ₁₀	11.0	5,495.9	2.75
PM _{2.5}	11.0	5,495.9	2.75
SO _x	0.1	58.2	0.03
HAP	0.1	52.8	0.03

Table 8. Key Parameters/Constants for Proposed New Emergency Generator Engine Emission Calculations

Parameter	Value	Unit
Engine Power(@1800 rpm) ¹	2280	kW
Engine Power(@1800 rpm) ²	3055	hp
Annual Hours	500	hrs/yr
Number of Engines	3	Engines

1. Engine Power per manufacturer specifications.

2. Converted assuming 1 kW = 1.34 hp

Table 9. Emission Factors

Pollutant	Value	Unit
VOC ¹	0.18	g/KW-hr
NO _x ³	0.72	g/KW-hr
CO ¹	1.90	g/KW-hr
PM ²	0.12	g/KW-hr
PM ₁₀ ²	0.12	g/KW-hr
PM _{2.5} ²	0.12	g/KW-hr
SO ₂ ¹	4.00E-03	g/KW-hr

1. CO, SO₂, PM, and VOC emission factors per manufacturer specifications. It is assumed that the nonmethane hydrocarbons (NMHC) are entirely VOCs.

2. Conversion from g/hp-hr to g/kW-hr: 1 g/kW-hr = 0.75 g/hp-hr

3. Engines are equipped with Selective Catalytic Reduction (SCR). Controlled NO_x emission rate was provided by manufacturer.

Table 10. HAP Emissions per Engine

Pollutant	Emission Factor		Hourly PTE (lb/hr) ³	Annual PTE	
	(lb/MMBtu) ¹	(lb/hp-hr) ²		(lb/yr) ⁴	(tpy)
Benzene	7.76E-04	5.43E-06	1.66E-02	8.30	4.15E-03
Toluene	2.81E-04	1.97E-06	6.01E-03	3.00	1.50E-03
Xylenes	1.93E-04	1.35E-06	4.13E-03	2.06	1.03E-03
Formaldehyde	7.89E-05	5.52E-07	1.69E-03	0.84	4.22E-04
Acetaldehyde	2.52E-05	1.76E-07	5.39E-04	0.27	1.35E-04
Acrolein	7.88E-06	5.52E-08	1.69E-04	0.08	4.21E-05
Naphthalene	1.30E-04	9.10E-07	2.78E-03	1.39	6.95E-04
Acenaphthylene	9.23E-06	6.46E-08	1.97E-04	0.10	4.93E-05
Acenaphthene	4.68E-06	3.28E-08	1.00E-04	0.05	2.50E-05
Fluorene	1.28E-05	8.96E-08	2.74E-04	0.14	6.84E-05
Phenanthrene	4.08E-05	2.86E-07	8.73E-04	0.44	2.18E-04
Anthracene	1.23E-06	8.61E-09	2.63E-05	0.01	6.58E-06
Fluoranthene	4.03E-06	2.82E-08	8.62E-05	0.04	2.15E-05
Pyrene	3.71E-06	2.60E-08	7.93E-05	0.04	1.98E-05
Benzo(a)anthracene	6.22E-07	4.35E-09	1.33E-05	0.01	3.33E-06
Chrysene	1.53E-06	1.07E-08	3.27E-05	0.02	8.18E-06
Benzo(b)fluoranthene	1.11E-06	7.77E-09	2.37E-05	0.01	5.93E-06
Benzo(k)fluoranthene	2.18E-07	1.53E-09	4.66E-06	2.33E-03	1.17E-06
Benzo(a)pyrene	2.57E-07	1.80E-09	5.50E-06	2.75E-03	1.37E-06
Indeno(1,2,3-cd)pyrene	4.14E-07	2.90E-09	8.85E-06	4.43E-03	2.21E-06
Dibenz(a,h)anthracene	3.46E-07	2.42E-09	7.40E-06	3.70E-03	1.85E-06
Benzo(g,h,i)perylene	5.56E-07	3.89E-09	1.19E-05	5.95E-03	2.97E-06
Total HAPs:			3.37E-02	16.83	8.41E-03
Total HAPs All Engines:			1.01E-01	50.48	0.03

1. HAP Emission Factors per AP-42 Chapter 3.4, Table 3.4-3 and Table 3.4-4 (10/96)

2. Conversion from Btu to hp-hr: 1 hp-hr =

7000 Btu per AP-42 Chapter 3-4, Table 3.4-1 (10/96).

3. Hourly PTE (lbs/hr) = Emission Factor (lb/hp-hr) * Engine Power (bhp)

4. Annual PTE (lbs/yr) = Hourly Emissions (lb/hr) * Annual Hours (hrs/yr)

Table 11. Potential Emissions per Engine

Pollutant	Hourly PTE (lb/hr) ¹	Annual PTE	
		(lb/yr) ²	(tpy)
VOC	0.9	452.4	0.23
NO _x	3.6	1,809.6	0.90
CO	9.6	4,775.2	2.39
PM	0.6	291.5	0.15
PM ₁₀	0.6	291.5	0.15
PM _{2.5}	0.6	291.5	0.15
SO ₂	0.0	10.1	5.03E-03
HAP	0.0	16.8	8.41E-03

1. Hourly PTE (lb/hr) = Emission Factor (g/kW-hr) * Engine Power (kW) / 453.592 (grams/lb)

2. Annual PTE (lb/year) = Hourly Emissions (lb/hr) * Annual Hours (hr/year)

Table 12. Greenhouse Gas Potential to Emit per Engine

Pollutant	Global Warming Potential ¹	Emission Factor (kg/MMBtu) ²	CO ₂ e emissions	
			(lb/yr) ³	(tpy)
CO ₂	1.0	74.0	1,743,568	871.78
CH ₄	25.0	3.00E-03	1,768	8.84E-01
N ₂ O	298.0	6.00E-04	4,215	2.11E+00
Total CO ₂ e Emissions (tpy):				874.78
Total CO₂e Emissions All Engines (tpy):				2,624.33

1. Global Warming Potentials are obtained from Subpart A of 40 CFR 98, Table A-1 "Global Warming Potentials."

2. Emission factor for carbon dioxide is obtained from 40 CFR 98, Table C-1 to Subpart C for Distillate Fuel Oil No. 2. Emission factors for methane and nitrous oxide are obtained from 40 CFR 98, Table C-2 to Subpart C.

3. CO₂e Potential Emissions (lb/year) = GWP * Emission Factor (kg/MMBtu) * 1000 (g/kg) * 7,000 (Btu/hp-hr) / 1,000,000 (Btu/MMBtu) * Annual Hours (hr/year) * Engine Power (bhp) / 453.592 (grams/lb)

4. Conversion from Btu to hp-hr: 1 hp-hr = 7000 Btu per AP-42 Chapter 3-3, Table 3.4-1 (10/96).

Table 13. Total Emissions for all New Engines

Pollutant	Hourly PTE (lb/hr)	Annual PTE	
		(lb/yr)	(tpy)
VOC	2.7	1,357.2	0.68
NO _x	10.9	5,428.7	2.71
CO	28.7	14,325.6	7.16
PM	1.7	874.6	0.44
PM ₁₀	1.7	874.6	0.44
PM _{2.5}	1.7	874.6	0.44
SO ₂	0.1	30.2	0.02
HAP	0.1	50.5	0.03



Contents

	Genset	Marine	O & G	Rail	C & I
Application	X				
Engine model	16V4000G74S				
Rated power [kW]	2280				
Rated speed [rpm]	1800				
Application Group	3D				
Legislative body	EPA Stationary EMERG T2 (40CFR60)				
Test cycle	D2				
Data Set No.	XZ54854100580				
Data Set Basis	EPA Nonroad T2 (40CFR1039)				
Fuel sulphur content [ppm]	8.9				

Content	Page
Disclaimer.....	2
Emission data sheet (EDS).....	3
Not to exceed emission values.....	5

		PDF	Name	Project no. na	Size A4		
		Configurator	Ungermann, Stefanie (TARC)	Order no. na			
		Approver1	Kneifel, Alexander (TSLE)	EDS-ID			
		Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023			
		Approver3	Buecheler, Otto (TVM)	Title Emission data sheet			
		Approver4					
User	NA/schroederch						
Description of Revision		Frequency		All industrial property rights reserved. Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.		Engine model 16V4000G74S	
Data generated by EDS Creator version 1.0 and unipilot. Ref.-dataset: 19.010.44.02_RP139_200513_DVP_ADEC_Values;1_D;1.nc for 798 in EDS platform.		Emissionstage EPA Stationary EMERG T2 (40CFR60)		Sheet 1			
				of 6			
Configuration-ID 798		Documentation For Nick Paolo with Smith Power Products Inc by Adam Fierstad		Emissionstage basis EPA Nonroad T2 (40CFR1039)			



General Disclaimers (valid for Measured and NTE values)

Please note that these data are physical and/or technical values only referring to and representing a normative defined operating condition. Any change in operating time and conditions will have impact on physical values and engine behavior, which must be considered and assessed within the complete propulsion system especially in regard to emission compliance and product safety.

Measurements listed in this EDS are representative of the listed engine rating at the time of testing. These measurements and results can change according to instrumentation, boundary condition, and engine to engine variability. In addition - changes to the engine family hard or software may occur which could result in changes to some of the listed values.

Emissions data measurement procedures are conducted according to applicable rules and standards as per "Emission Stage/Optimization". Potential deviations from these procedures are documented internally.

The listed emission values relate to the corresponding certification data. Seller doesn't take any responsibility or liability neither out or in connection with the contract nor on any other basis

- beyond these specified operating conditions of the engine
- and for any installation/modification of the entire propulsion system by the customer itself or any third party

and the customer will indemnify MTU on first demand for any third party claim out or in connection with this.

Seller reserves the right to amend specifications and information without notice and without obligation or liability. No liability for any errors, facts or opinions is accepted. Customers must satisfy themselves as to the suitability of this product for their application. No responsibility for any loss as a result of any person placing reliance on any material contained in this data sheet will be accepted.

Seller reserves all rights in the information contained in this data sheet. It shall not be reproduced, made available to a third party or otherwise used in any way whatsoever.

When applicable, emission values are measured after combined exhaust streams.

Measured Emissions data is based on single operating points and thus cannot be used to compare to regulations which use values based on a weighted cycle.

Field emission test data are not guaranteed to these levels. Actual field test results may vary due to test site conditions, installation, fuel specification, test procedures, and instrumentation. Over time deterioration may occur which may have an impact on emission levels.

The SO₂ emission rates comprehend exclusively the SO₂ content as found in the fuel source, oil consumption effects are not included. Variation of sulfur content in the fuel changes only the stated SO₂ emissions, cross sensitivity to other emissions (e.g. particulates) is not possible.

All values based on metric units, inaccuracies for non metric values can occur, values are not binding.

Specific to gas engines: The listed emission values are based on gas composition at the time of certification measurement. Gas composition is as displayed in the EDS-document. Carbon dioxide and methane concentrations have direct influence on the corresponding displayed carbon dioxide and methane emissions.

EAT Specific Disclaimers (valid for EDS values)

NH₃ emissions levels measured with AVL SESAM i60/ 4 FT Multi Component Exhaust Measurement System (FTIR) including EPA 40 CFR 1065 legislation compliant automated checks for linearity.

Generators or engines with exhaust after-treatment systems require a stabilization period of approximately 1 hour to ensure stable temperatures across SCR prior to performing an emissions test. Performing emissions measurements before a stable temperature has been achieved can result in inconsistent emission values. NO_x Values only applicable if temperatures across SCR reached for DEF Dosing.

NTE Disclaimers (valid for NTE calculated values)

Calculated not to exceed values (NTE) are not proven by tests and therefore the accuracy is not guaranteed.

All emission data shown in chapters Emission Data Sheet, Not to Exceed Values, and Type Approval were gathered from a corresponding certification engine under test conditions shown above and complying to corresponding TEN data.

		PDF	Name	Project no. na	Size A4
		Configurator	Ungermann, Stefanie (TARC)	Order no. na	
		Approver1	Kneifel, Alexander (TSLE)	EDS-ID	
		Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023	
		Approver3	Buecheler, Otto (TVM)	Title Emission data sheet	
		Approver4			
		User	NAIschroederch		
		Engine model 16V4000G74S			
Description of Revision		Frequency			
Data generated by EDS Creator version 1.0 and uniplot. Ref.-dataset: 19.010.44.02_RP139_200513_DVP_ADEC_Values;1_D;1.nc for 798 in EDS platform.		All industrial property rights reserved. Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.			
		Emissionstage EPA Stationary EMERG T2 (40CFR60)			
Configuration-ID 798		Documentation For Nick Paolo with Smith Power Products Inc by Adam Fierstad Emissionstage basis EPA Nonroad T2 (40CFR1039)			
		Sheet 2 of 6			



Engine data

	Genset	Marine	O & G	Rail	C & I
Application	X				
Engine model	16V4000G74S				
Application Group	3D				
Legislative body	EPA Stationary EMERG T2 (40CFR60)				
Test cycle	D2				
Fuel sulphur content [ppm]	8.9				
mg/mN ³ values base on residual oxygen value of [%]	Measured				

Engine raw emissions*

Cycle point	[-]	n1	n2	n3	n4	n5
Power	kW	2279	1709	1138	569	228
Power relative	[-]	1	0.75	0.5	0.25	0.1
Engine speed	rpm	1800	1800	1800	1800	1800
Engine speed relative	[-]	1	1	1	1	1
Filter smoke number	FSN	0.68	0.9	0.33	0.7	0.19
Exhaust temperature after ETC	grdC	508.1	454.3	420.4	367.1	244.1
Exhaust back pressure after ETC (static)	mbar	65	46	31	16	8
Exhaust back pressure after ETC (total)	mbar	76	54	36	19	9
Exhaust mass flow wet	kg/h	12925	11133	9095	6801	4990
NOX-Emissions specific	g/kWh	5.56	4.99	3.93	2.94	8.72
SO2-Emissions specific	g/kWh	0.004	0.004	0.004	0.005	0.006
CO-Emissions specific	g/kWh	1.12	0.99	0.49	1.24	4.85
HC1-Emissions specific	g/kWh	0.11	0.13	0.24	0.62	1.68
NMHC-Emissions specific	g/kWh	0.11	0.14	0.24	0.62	1.68

		PDF	Name	Project no. na	Size A4	
		Configurator	Ungermann, Stefanie (TARC)	Order no. na		
		Approver1	Kneifel, Alexander (TSLE)	EDS-ID		
		Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023		
		Approver3	Buecheler, Otto (TVM)			
		Approver4				
		User	NAIschroederch			
		Engine model 16V4000G74S			Title Emission data sheet	
Description of Revision		Frequency				
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		Emissionstage EPA Stationary EMERG T2 (40CFR60)				Sheet 3
Configuration-ID 798		Documentation For Nick Paolo with Smith Power Products Inc by Adam Flerstad Emissionstage basis EPA Nonroad T2 (40CFR1039)				of 6



NOX+HC1-Emissions specific	g/kWh	5.67	5.12	4.17	3.56	10.4
NOX+NMHC-Emissions specific	g/kWh	5.67	5.12	4.17	3.56	10.4
CO2-Emissions specific	g/kWh	672.6	679.6	735	875.4	1095
PM-Emissions specific (Meas.)	g/kWh	0.077	0.117	0.062	0.214	0.45
NOX-Emissions (based on O2 meas)	mg/m3N	1531	1182	754	372	594
NOX+HC1-Emissions (based on O2 meas)	mg/m3N	1557	1210	794	442	697
CO2-Emissions (based on O2 meas)	mg/m3N	165335	144049	126033	99138	66670
CO-Emissions (based on O2 meas)	mg/m3N	274.2	210.6	84.1	140	295.4
HC1-Emissions (based on O2 meas)	mg/m3N	26.4	28.5	40.7	70.4	102.5
SO2-Emissions (based on O2 meas)	mg/m3N	0.9	0.8	0.7	0.6	0.4
PM-Emissions (based on O2 meas)	mg/m3N	19	24.9	10.7	24.2	27.4

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			Configurator	Ungermann, Stefanie (TARC)	Order no. na	
			Approver1	Kneifel, Alexander (TSLE)	EDS-ID	
			Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023	
			Approver3	Buecheler, Otto (TVM)	Title Emission data sheet	
Approver4						
User	NA/schroederch					
Data generated by EDS Creator version 1.0 and uniplot. Ref.-dataset: 19.010.44.02_RP139_200513_DVP_ADEC_Values;1_D;1.nc for 798 in EDS platform.		Engine model 16V4000G74S				
Configuration-ID 798		Documentation For Nick Paolo with Smith Power Products Inc by Adam Fierstad		Emissionstage EPA Stationary EMERG T2 (40CFR60)		Sheet 4
				Emissionstage basis EPA Nonroad T2 (40CFR1039)		of 6



Engine data

	Genset	Marine	O & G	Rail	C & I
Application	X				
Engine model	16V4000G74S				
Application Group	3D				
Legislative body	EPA Stationary EMERG T2 (40CFR60)				
Test cycle	D2				
Fuel sulphur content [ppm]	8.9				
mg/mN ³ values base on residual oxygen value of [%]	Measured				

Not to exceed emission values*

Cycle point	[-]	n1	n2	n3	n4	n5
Power	kW	2279	1709	1138	569	228
Power relative	[-]	1	0.75	0.5	0.25	0.1
Engine speed	rpm	1800	1800	1800	1800	1800
Engine speed relative	[-]	1	1	1	1	1
NOX-Emissions specific	g/kWh	7.23	6.48	5.11	4.41	16.57
CO-Emissions specific	g/kWh	1.9	1.69	0.93	2.47	9.71
HC1-Emissions specific	g/kWh	0.18	0.23	0.45	1.24	4.88
NMHC-Emissions specific	g/kWh	0.18	0.23	0.45	1.25	
NOX+HC1-Emissions specific	g/kWh	7.41	6.71	5.56	5.66	21.45
NOX+NMHC-Emissions specific	g/kWh	7.41	6.71	5.57	5.66	
PM-Emissions specific (Meas.)	g/kWh	0.116	0.188	0.094	0.32	1.665
NOX-Emissions (based on O2 meas)	mg/m3N	1990	1537	980	558	1129
NOX+HC1-Emissions (based on O2 meas)	mg/m3N	2035	1585	1057	699	1426
CO-Emissions (based on O2 meas)	mg/m3N	466.2	358.1	159.8	280.1	590.9

		PDF	Name	Project no. na	Size A4
		Configurator	Ungermann, Stefanie (TARC)	Order no. na	
		Approver1	Kneifel, Alexander (TSLE)	EDS-ID	
		Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023	
		Approver3	Buecheler, Otto (TVM)		
Approver4					
User	NAIschroederch				
Description of Revision		Frequency	All industrial property rights reserved. Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.		Title Emission data sheet
Data generated by EDS Creator version 1.0 and unipilot. Ref.-dataset: 19.010.44.02_RP139_200513_DVP_ADEC_Values;1_D;1.nc for 798 in EDS platform.					
		Emissionstage EPA Stationary EMERG T2 (40CFR60)			Sheet 5
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		Emissionstage basis EPA Nonroad T2 (40CFR1039)			



HC1-Emissions (based on O2 meas)	mg/m3N	44.8	48.5	77.3	140.7	297.2
PM-Emissions (based on O2 meas)	mg/m3N	28.6	39.8	16.1	36.3	101.4

Description of Revision		Frequency	All industrial property rights reserved. Disclosure, reproduction or use for any other purpose is prohibited unless our express permission has been given. Any infringement results in liability to pay damages.	PDF	Name	Project no. na	Size A4
				Configurator	Ungermann, Stefanie (TARC)	Order no. na	
				Approver1	Kneifel, Alexander (TSLE)	EDS-ID	
				Approver2	Pizzuto, Gustave (TAR)	2229-24.01.2023	
				Approver3	Buecheler, Otto (TVM)	Title Emission data sheet	
				Approver4			
User	NAIschroederch						
Data generated by EDS Creator version 1.0 and unipilot. Ref.-dataset: 19.010.44.02_RP139_200513_DVP_ADEC_Values;1_D;1.nc for 798 in EDS platform.		Engine model 16V4000G74S		Sheet 6 of 6			
		Emissionstage EPA Stationary EMERG T2 (40CFR60)					
Configuration-ID 798	Documentation For Nick Paolo with Smith Power Products Inc by Adam Fierstad	Emissionstage basis EPA Nonroad T2 (40CFR1039)					

Attachment D
Modeling Determination Form APCD-114



Facility and Project Information Submittal Form for Modeling Requirements Determination Form APCD-114

Please answer all questions on this form. If requested information does not apply to your project, insert "N/A." Form completion and submission of all associated documentation is required to obtain a Permit Modeling Unit (PMU) Determination. This Determination must describe and include all substantially related changes to the source that are being made as part of the modification(s) leading to this permit action, even if those changes are being, or have been, submitted under a separate application, and even if those changes are not being permitted as part of this permit action. All information submitted to obtain this modeling determination must be the same as that submitted to the Division's permitting staff in support of the permit application, including, but not limited to, requested emission limitations, requested annual operating hours, facility configuration, and stack characteristics provided on the Air Pollutant Emissions Notice (APEN). Any changes to this information can result in the need for a new modeling determination. Please submit this form and all attachments to cdphe_apcd_modelingdeterminations@state.co.us.

- 1) Date: 5/1/2024
- 2) Company Name: Novva Colorado, LLC
- 3) Company Contact Information

Name: Anthony Gustin

Email: a.gustin@novva.com

Phone Number: (385) 415-9065
- 4) Applicant Contact Information (if different than company contact)

Name: Sophia Gump

Email: s.gump@novva.com

Phone Number: _____
- 5) Facility Name: Colorado Springs
- 6) Is this a new facility or a modification to an existing facility? New Facility ☐ Modification ☒

If new, please provide location (LAT/LONG or UTM coordinates and zone): _____

Describe the existing modified and new emission points (including APEN- and permit-exempt sources), AIRS ID number, and location (LAT/LONG or UTM):

<u>Description</u>	<u>AIRS ID Number</u>	<u>LAT/LONG or UTM</u>
<u>Generator 4 (new)</u>	_____	_____
<u>Generator 5 (new)</u>	_____	_____
<u>Generator 6 (new)</u>	_____	_____
_____	_____	_____
_____	_____	_____

- 11) Is the proposed permitting action a conversion of a GP09 or GP10 to a construction permit?

Yes ☐No ☒

If yes, when was the original GP09 or GP10 registration request submitted to the Division?

- 12) Please provide a 1:24,000 topographical map with the new or modified emissions point(s), structures, and site boundary shown.
- 13) **Attach** facility criteria pollutant (NOX, SO₂, CO, PM₁₀ and PM_{2.5}) potential to emit (PTE) emission estimates for all new and modified emission units, as well as facility totals, before and after this modification (including all substantially related changes) and the total change in emissions. If the source is subject to the Environmental Justice provisions, provide facility benzene, toluene, ethylbenzene, xylenes, and total BTEX potential to emit (PTE) emission estimates for all modified and new emission units, as well as facility totals, before and after this modification (including all substantially-related changes) and the total change in emissions. Include fugitive and APEN- and permit-exempt emission units. Provide release parameters for each emissions unit (as provided in tables below). Include Form APCD-102 or APCD-102a for the facility. The tables below provide a guide for the information required to make the modeling determination. Please provide details in an attachment, as the below tables do not provide adequate space.

Point Sources (e.g. stacks and isolated vents) with a vertical release (not a flare)									
Pollutant:									
Source ID	Description of source	Location LAT/LONG or UTM	Emission rate (tpy)	Emission rate (lb/hr)	Source release height above ground (m)	Stack gas exit temperature (K)	Stack gas exit velocity (m/s)	Stack inside diameter (m)	Capped, J-tube, or Horizontal release?
Example. Do not complete this table. Please attach information according to instructions.									

Flares								
Pollutant:								
Source ID	Description of source	Location LAT/LONG or UTM	Emission rate (tpy)	Emission rate (lb/hr)	Effective Stack Height	Stack gas exit temperature	Stack gas exit velocity	Effective Stack inside Diameter
					Value (m)	Value (K)	Value (m/s)	Value (m)
Example. Do not complete this table. Please attach information according to instructions								

Calculate the effective stack parameters for flares as discussed in the AERSCREEN User's Guide. For ECDs provide source release height and stack inside diameter.

Volume Sources (releases at an elevation e.g. multiple vents, conveyor belts)							
		Pollutant:					
Source ID	Description of source	Location LAT/LONG or UTM	Emission rate (tpy)	Emission rate (lb/hr)	Release height	Initial lateral dimension σ_y	Initial vertical dimension σ_z
					Value (m)	Value (m)	Value (m)
Example. Do not complete this table. Please attach information according to instructions.							

Use procedures in Table 3-2 of the AERMOD User's Guide to calculate vertical and lateral dimensions.

Area Sources (low level releases e.g. storage piles, slag dumps, lagoons)							
Pollutant:							
Source ID	Description of source	Location LAT/LONG or UTM	Emission rate (tpy)	Emission rate (lb/hr)	Release height	Length of side X- and Y-dimension	Initial vertical dimension σ_z
					Value (m)	Values (m)	Value (m)
Example. Do not complete this table. Please attach information according to instructions.							

Use this table to include Areacircle and Areapoly sources as well.

Openpit Sources							
Pollutant:							
Source ID	Description of source	Location LAT/LONG or UTM	Emission rate (tpy)	Emission rate (lb/hr)	Release height above base of pit	Length of side X- and Y-dimension	Pit Volume
					Value (m)	Values (m)	Value (m ³)
Example. Do not complete this table. Please attach information according to instructions.							

14) Please provide the source's operating schedule:

Daily starting and ending hours (e.g. 7 AM - 5 PM): maintenance/testing 8-5pm, as needed for emergencies

Days of the week (e.g. Monday - Friday): as needed for emergencies/maintenance/testing

15) If emissions points are located adjacent to buildings or other structures, please provide structure dimensions.

<u>Building Description</u>	<u>Height (m)</u>	<u>Length (m)</u>	<u>Width (m)</u>
TBD			

- 16) Has this facility been modeled before? Yes ☐ No ☒

If yes, provide any records of previous modeling demonstrations that the facility will not cause or contribute to a violation of the NAAQS.

- 17) If you do not believe modeling should be required for the proposed permitting action, please provide clear justification for this, along with the information requested above.

The proposed new engines will only operate intermittently and the combined PTE for them is low. The proposed units will operate less than 500 hours per year, will limit maintenance and testing to 100 hours per year per engine between the hours of 8 am and 5 pm, and will be equipped with Selective Catalytic Reduction (SCR) emissions control units. Twice per year, the facility will conduct 15-minute tests during which all generators will run at once. All other maintenance and testing will be done with only one generator in operation at a time.

- 18) Has a permit application already been submitted for this facility and still awaiting permit approval? Yes ☐ No ☒

If yes, when was the application submitted? _____

----- INTERNAL USE ONLY - DO NOT WRITE BELOW THIS LINE -----

1) Modeling determination identification number: APCD MD_1555

2) Existing Source Facility ID and AIRS number: 041-1620

3) Is the proposed facility located in a Cumulatively Impacted Community?

Yes ☐

No ☒

4) Based on the application information submitted, is modeling required to determine source-specific monitoring requirements?

Yes ☐

No ☒

5) Based on the application information submitted, is modeling needed to complete the required NAAQS analysis?

Yes ☐

No ☒

6) Justification for Modeling Determination (e.g., previous NAAQS modeling demonstration has been made):

The facility is not located in a Cumulatively Impacted Community, therefore additional modeling under AQCC Regulation 3 Part B III.B.4 is not applicable.

As part of the prior permitting action for this source, the Division made a determination this source will not cause an exceedance of any National Ambient Air Quality Standards ("NAAQS") as required by Colorado Air Quality Control Commission Regulation 3, Part B. The Division is not reconsidering that prior determination. In every permitting action, however, the Division must conduct a NAAQS analysis regarding whether the proposed source or activity which is the basis of the new permit application will cause an exceedance of the NAAQS. Depending on several variables, modeling may be required in some cases to conduct the required NAAQS analysis. However, requiring modeling solely because modeling was not previously used to conduct the required NAAQS analysis is not justified. This permitting action must be evaluated on its own merit and site-specific/case-specific facts.

In this current permit application, NOVVA is proposing to install three additional emergency engines at the Colorado Springs Facility. The proposed project is represented to result in net increases of 7.16 tpy (9.6 lb/hr) CO, 0.02 tpy (0.005 lb/hr) SO₂, 2.71 tpy (0.62 lb/hr) NO_x, and 0.44 tpy (5.4 lb/day) PM_{10/2.5}. The lb/hr emissions for NO_x and SO₂ are annualized based on 500 hr/yr operation, and maintenance is limited to 8 am - 5 pm and testing will not be done simultaneously. The emissions for CO are not annualized and are the maximum lb/hr of just one engine, since the engines can't operate simultaneously. The emissions for PM are also not annualized and take into account the limit to maintenance and testing of 9 hours per day not to be done simultaneously. Although the applicant has represented that testing multiple engines at once is sometimes necessary this is relatively infrequent, 15 minute tests twice per year, so the emissions evaluated remain based on one engine operating for testing at a time since that is the predominant operating scenario. The proposed emission rates for these pollutants are below the attainment thresholds in Table 1 of the Colorado Minor NSR Source Modeling Guideline for Air Quality Permits (May 2023). The threshold amounts in Table 1 are considered de minimis emissions, which have a low probability of causing or contributing to an exceedance of any NAAQS. This facility has adequate dispersion characteristics and a review of nearby sources shows low potential nearby CO impacts associated with the location of the facility (El Paso County) within the CO attainment maintenance area. Based on the conditions at and surrounding the site PMU has concluded that it is unlikely the proposed source or activity which is the basis for this permit modification will cause an exceedance of any NAAQS. Therefore, modeling is not required, or justified, to conduct the NAAQS analysis.

- 7) If modeling is required, which criteria pollutants and averaging periods need to be modeled to demonstrate compliance with the National Ambient Air Quality Standards and Colorado Ambient Air Quality Standards?

N/A

- 8) If BTEX modeling is required, which pollutants need to be modeled to determine applicability to the Source Specific Monitoring Thresholds?

N/A

- 9) If modeling is needed, provide modeling procedure guidance.

N/A

- 10) Date modeling decision provided to Applicant and CDPHE Permitting Representative

5/15/2024

- 11) Number of hours spent on modeling determination

.5

APPROVED
MODELING NOT REQUIRED

Table 1. Summary of Emissions

	Pollutant (tpy)								
	PM ₁₀	PM _{2.5}	TSP	NO _x	VOC	CO	SO ₂	HAPs	GHG
Existing Emergency Generators PTE	2.75	2.75	2.75	48.02	1.17	1.73	0.03	0.03	2,745.27
Proposed Emergency Generators PTE	0.44	0.44	0.44	2.71	0.68	7.16	0.02	0.03	2,624.33
Post Project Site Wide PTE ¹	3.19	3.19	3.19	50.73	1.85	8.89	0.04	0.05	5,369.60
APEN Threshold ²	2	2	2	2	2	2	2	0.13	--
Permit Threshold ³	5	2	10	10	5	10	10	--	--
GP-06 Threshold ⁴	--	--	--	90	90	90	--	--	--
Title V Operating Permit Levels (tpy) ^{5,6}	100	100	100	100	100	100	100	10	--
Project Emissions Exceed APEN Thresholds?	No	No	No	Yes	No	Yes	No	No	No
Facility Emissions Exceed GP-06 Threshold?	No	No	No	No	No	No	No	No	No
Facility Emissions Exceed Title V Operating Permit Levels?	No	No	No	No	No	No	No	No	No

1. Post Project Site Wide PTE (tpy) = Potential Emissions per Engine (tpy) * Number of Engines (including the three existing and three proposed engines)

2. APEN Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

3. Permit Thresholds (attainment) per <https://cdphe.colorado.gov/apens-and-air-permits/do-you-need-an-apen-or-air-permit>

4. GP-06 Threshold come from the Emission Limitation Requirements for II.A.1. as the facility is located outside of the Denver ozone nonattainment area.

5. Part 70 source levels come from the definition of Major Source in 40 CFR 70.2 and Colorado Regulation No. 3, Part A, Section I.B.25.

6. Note that the relevant threshold for HAPs is 25 tpy total HAPs or 10 tpy of any individual HAP.

Table 2. Key Parameters/Constants for Existing Emergency Generator Engine Emission Calculations

Parameter	Value	Unit
Engine Power(@1800 rpm) ¹	3,196	bhp
Annual Hours	500	hrs/yr
Number of Engines	3	Engines

1. Engine Power per manufacturer specifications.

Table 3. Emission Factors

Pollutant	Value	Unit
VOC ¹	1.56	lb/hr
NO _x ¹	64.02	lb/hr
CO ¹	2.30	lb/hr
PM	0.52	g/hp-hr
PM ₁₀ ¹	0.52	g/hp-hr
PM _{2.5} ¹	0.52	g/hp-hr
SO _x ²	5.50E-03	g/hp-hr

1. NO_x, CO, PM, and VOC emission factors per manufacturer specifications. It is assumed that the hydrocarbons (HC) are entirely VOCs.

2. The engine will use ultra low sulfur diesel fuel. The emission factor is based on a fuel sulfur content of 0.0015% for ultra low sulfur diesel fuel, as defined under 40 CFR 80, Subpart I, Section 80.510(c)(1). The SO₂ emission factor from AP-42 Section 3.4, Table 3.4-1 (10/96) was used.

3. Conversion from g/hp-hr to g/kW-hr: 1 g/kW-hr = 0.75 g/hp-hr

Table 4. HAP Emissions per Engine

Pollutant	Emission Factor		Hourly PTE (lb/hr) ³	Annual PTE	
	(lb/MMBtu) ¹	(lb/hp-hr) ²		(lb/yr) ⁴	(tpy)
Benzene	7.76E-04	5.43E-06	1.74E-02	8.68	4.34E-03
Toluene	2.81E-04	1.97E-06	6.29E-03	3.14	1.57E-03
Xylenes	1.93E-04	1.35E-06	4.32E-03	2.16	1.08E-03
Formaldehyde	7.89E-05	5.52E-07	1.77E-03	0.88	4.41E-04
Acetaldehyde	2.52E-05	1.76E-07	5.64E-04	0.28	1.41E-04
Acrolein	7.88E-06	5.52E-08	1.76E-04	0.09	4.41E-05
Naphthalene	1.30E-04	9.10E-07	2.91E-03	1.45	7.27E-04
Acenaphthylene	9.23E-06	6.46E-08	2.06E-04	0.10	5.16E-05
Acenaphthene	4.68E-06	3.28E-08	1.05E-04	0.05	2.62E-05
Fluorene	1.28E-05	8.96E-08	2.86E-04	0.14	7.16E-05
Phenanthrene	4.08E-05	2.86E-07	9.13E-04	0.46	2.28E-04
Anthracene	1.23E-06	8.61E-09	2.75E-05	0.01	6.88E-06
Fluoranthene	4.03E-06	2.82E-08	9.02E-05	0.05	2.25E-05
Pyrene	3.71E-06	2.60E-08	8.30E-05	0.04	2.08E-05
Benzo(a)anthracene	6.22E-07	4.35E-09	1.39E-05	0.01	3.48E-06
Chrysene	1.53E-06	1.07E-08	3.42E-05	0.02	8.56E-06
Benzo(b)fluoranthene	1.11E-06	7.77E-09	2.48E-05	1.24E-02	6.21E-06
Benzo(k)fluoranthene	2.18E-07	1.53E-09	4.88E-06	2.44E-03	1.22E-06
Benzo(a)pyrene	2.57E-07	1.80E-09	5.75E-06	2.87E-03	1.44E-06
Indeno(1,2,3-cd)pyrene	4.14E-07	2.90E-09	9.26E-06	4.63E-03	2.32E-06
Dibenz(a,h)anthracene	3.46E-07	2.42E-09	7.74E-06	3.87E-03	1.94E-06
Benzo(g,h,i)perylene	5.56E-07	3.89E-09	1.24E-05	6.22E-03	3.11E-06
Total HAPs per Engine:			3.52E-02	17.60	0.01
Total HAPs All Engines:			1.06E-01	52.80	0.03

1. HAP Emission Factors per AP-42 Chapter 3.4, Table 3.4-3 and Table 3.4-4 (10/96)

2. Conversion from Btu to hp-hr =

7000 Btu per AP-42 Chapter 3-4, Table 3.4-1 (10/96).

3. Hourly PTE (lbs/hr) = Emission Factor (g/hp-hr) * Engine Power (bhp)

4. Annual PTE (lbs/yr) = Hourly Emissions (lb/hr) * Annual Hours (hrs/yr)

Table 5. Potential Emissions per Engine

Pollutant	Hourly PTE (lb/hr) ¹	Annual PTE	
		(lb/yr) ²	(tpy)
VOC	1.6	780.0	0.39
NO _x	64.0	32,010.0	16.01
CO	2.3	1,150.0	0.58
PM	3.7	1,832.0	0.92
PM ₁₀	3.7	1,832.0	0.92
PM _{2.5}	3.7	1,832.0	0.92
SO _x	0.0	19.4	0.01
HAP	0.0	17.6	0.01

1. Hourly PTE (lb/hr) = Emission Factor (g/hp-hr) * Engine Power (bhp) / 453.592 (grams/lb)

2. Annual PTE (lb/year) = Hourly Emissions (lb/hr) * Annual Hours (hr/year)

Table 6. Greenhouse Gas Potential to Emit per Engine

Pollutant	Global Warming Potential ¹	Emission Factor (kg/MMBtu) ²	CO ₂ e emissions	
			(lb/yr) ³	(tpy)
CO ₂	1.0	74.0	1,823,921	911.96
CH ₄	25.0	3.00E-03	1,850	0.92
N ₂ O	298.0	6.00E-04	4,409	2.20
Total CO₂e Emissions per Engine (tpy):				915.09
Total CO₂e Emissions All Engines (tpy):				2,745.27

1. Global Warming Potentials are obtained from Subpart A of 40 CFR 98, Table A-1 "Global Warming Potentials."

2. Emission factor for carbon dioxide is obtained from 40 CFR 98, Table C-1 to Subpart C for Distillate Fuel Oil No. 2. Emission factors for methane and nitrous oxide are obtained from 40 CFR 98, Table C-2 to Subpart C.

3. CO₂e Potential Emissions (lb/year) = GWP * Emission Factor (kg/MMBtu) * 1000 (g/kg) * 7,000 (Btu/hp-hr) / 1,000,000 (Btu/MMBtu) * Annual Hours (hr/year) * Engine Power (bhp) / 453.592 (grams/lb)

4. Conversion from Btu to hp-hr: 1 hp-hr = 7000 Btu per AP-42 Chapter 3-3, Table 3.4-1 (10/96).

Table 7. Total Emissions for all Existing Engines

Pollutant	Hourly PTE (lb/hr)	Annual PTE	
		(lb/yr)	(tpy)
VOC	4.7	2,340.0	1.17
NO _x	192.1	96,030.0	48.02
CO	6.9	3,450.0	1.73
PM	11.0	5,495.9	2.75
PM ₁₀	11.0	5,495.9	2.75
PM _{2.5}	11.0	5,495.9	2.75
SO _x	0.1	58.2	0.03
HAP	0.1	52.8	0.03

Table 8. Key Parameters/Constants for Proposed New Emergency Generator Engine Emission Calculations

Parameter	Value	Unit
Engine Power(@1800 rpm) ¹	2280	kW
Engine Power(@1800 rpm) ²	3055	hp
Annual Hours	500	hrs/yr
Number of Engines	3	Engines

1. Engine Power per manufacturer specifications.

2. Converted assuming 1 kW = 1.34 hp

Table 9. Emission Factors

Pollutant	Value	Unit
VOC ¹	0.18	g/KW-hr
NO _x ³	0.72	g/KW-hr
CO ¹	1.90	g/KW-hr
PM ²	0.12	g/KW-hr
PM ₁₀ ²	0.12	g/KW-hr
PM _{2.5} ²	0.12	g/KW-hr
SO ₂ ¹	4.00E-03	g/KW-hr

1. CO, SO₂, PM, and VOC emission factors per manufacturer specifications. It is assumed that the nonmethane hydrocarbons (NMHC) are entirely VOCs.

2. Conversion from g/hp-hr to g/kW-hr: 1 g/kW-hr = 0.75 g/hp-hr

3. Engines are equipped with Selective Catalytic Reduction (SCR). Controlled NO_x emission rate was provided by manufacturer.

Table 10. HAP Emissions per Engine

Pollutant	Emission Factor		Hourly PTE (lb/hr) ³	Annual PTE	
	(lb/MMBtu) ¹	(lb/hp-hr) ²		(lb/yr) ⁴	(tpy)
Benzene	7.76E-04	5.43E-06	1.66E-02	8.30	4.15E-03
Toluene	2.81E-04	1.97E-06	6.01E-03	3.00	1.50E-03
Xylenes	1.93E-04	1.35E-06	4.13E-03	2.06	1.03E-03
Formaldehyde	7.89E-05	5.52E-07	1.69E-03	0.84	4.22E-04
Acetaldehyde	2.52E-05	1.76E-07	5.39E-04	0.27	1.35E-04
Acrolein	7.88E-06	5.52E-08	1.69E-04	0.08	4.21E-05
Naphthalene	1.30E-04	9.10E-07	2.78E-03	1.39	6.95E-04
Acenaphthylene	9.23E-06	6.46E-08	1.97E-04	0.10	4.93E-05
Acenaphthene	4.68E-06	3.28E-08	1.00E-04	0.05	2.50E-05
Fluorene	1.28E-05	8.96E-08	2.74E-04	0.14	6.84E-05
Phenanthrene	4.08E-05	2.86E-07	8.73E-04	0.44	2.18E-04
Anthracene	1.23E-06	8.61E-09	2.63E-05	0.01	6.58E-06
Fluoranthene	4.03E-06	2.82E-08	8.62E-05	0.04	2.15E-05
Pyrene	3.71E-06	2.60E-08	7.93E-05	0.04	1.98E-05
Benzo(a)anthracene	6.22E-07	4.35E-09	1.33E-05	0.01	3.33E-06
Chrysene	1.53E-06	1.07E-08	3.27E-05	0.02	8.18E-06
Benzo(b)fluoranthene	1.11E-06	7.77E-09	2.37E-05	0.01	5.93E-06
Benzo(k)fluoranthene	2.18E-07	1.53E-09	4.66E-06	2.33E-03	1.17E-06
Benzo(a)pyrene	2.57E-07	1.80E-09	5.50E-06	2.75E-03	1.37E-06
Indeno(1,2,3-cd)pyrene	4.14E-07	2.90E-09	8.85E-06	4.43E-03	2.21E-06
Dibenz(a,h)anthracene	3.46E-07	2.42E-09	7.40E-06	3.70E-03	1.85E-06
Benzo(g,h,i)perylene	5.56E-07	3.89E-09	1.19E-05	5.95E-03	2.97E-06
Total HAPs:			3.37E-02	16.83	8.41E-03
Total HAPs All Engines:			1.01E-01	50.48	0.03

1. HAP Emission Factors per AP-42 Chapter 3.4, Table 3.4-3 and Table 3.4-4 (10/96)

2. Conversion from Btu to hp-hr: 1 hp-hr =

7000 Btu per AP-42 Chapter 3-4, Table 3.4-1 (10/96).

3. Hourly PTE (lbs/hr) = Emission Factor (lb/hp-hr) * Engine Power (bhp)

4. Annual PTE (lbs/yr) = Hourly Emissions (lb/hr) * Annual Hours (hrs/yr)

Table 11. Potential Emissions per Engine

Pollutant	Hourly PTE (lb/hr) ¹	Annual PTE	
		(lb/yr) ²	(tpy)
VOC	0.9	452.4	0.23
NO _x	3.6	1,809.6	0.90
CO	9.6	4,775.2	2.39
PM	0.6	291.5	0.15
PM ₁₀	0.6	291.5	0.15
PM _{2.5}	0.6	291.5	0.15
SO ₂	0.0	10.1	5.03E-03
HAP	0.0	16.8	8.41E-03

1. Hourly PTE (lb/hr) = Emission Factor (g/kW-hr) * Engine Power (kW) / 453.592 (grams/lb)

2. Annual PTE (lb/year) = Hourly Emissions (lb/hr) * Annual Hours (hr/year)

Table 12. Greenhouse Gas Potential to Emit per Engine

Pollutant	Global Warming Potential ¹	Emission Factor (kg/MMBtu) ²	CO ₂ e emissions	
			(lb/yr) ³	(tpy)
CO ₂	1.0	74.0	1,743,568	871.78
CH ₄	25.0	3.00E-03	1,768	8.84E-01
N ₂ O	298.0	6.00E-04	4,215	2.11E+00
Total CO ₂ e Emissions (tpy):				874.78
Total CO₂e Emissions All Engines (tpy):				2,624.33

1. Global Warming Potentials are obtained from Subpart A of 40 CFR 98, Table A-1 "Global Warming Potentials."

2. Emission factor for carbon dioxide is obtained from 40 CFR 98, Table C-1 to Subpart C for Distillate Fuel Oil No. 2. Emission factors for methane and nitrous oxide are obtained from 40 CFR 98, Table C-2 to Subpart C.

3. CO₂e Potential Emissions (lb/year) = GWP * Emission Factor (kg/MMBtu) * 1000 (g/kg) * 7,000 (Btu/hp-hr) / 1,000,000 (Btu/MMBtu) * Annual Hours (hr/year) * Engine Power (bhp) / 453.592 (grams/lb)

4. Conversion from Btu to hp-hr: 1 hp-hr = 7000 Btu per AP-42 Chapter 3-3, Table 3.4-1 (10/96).

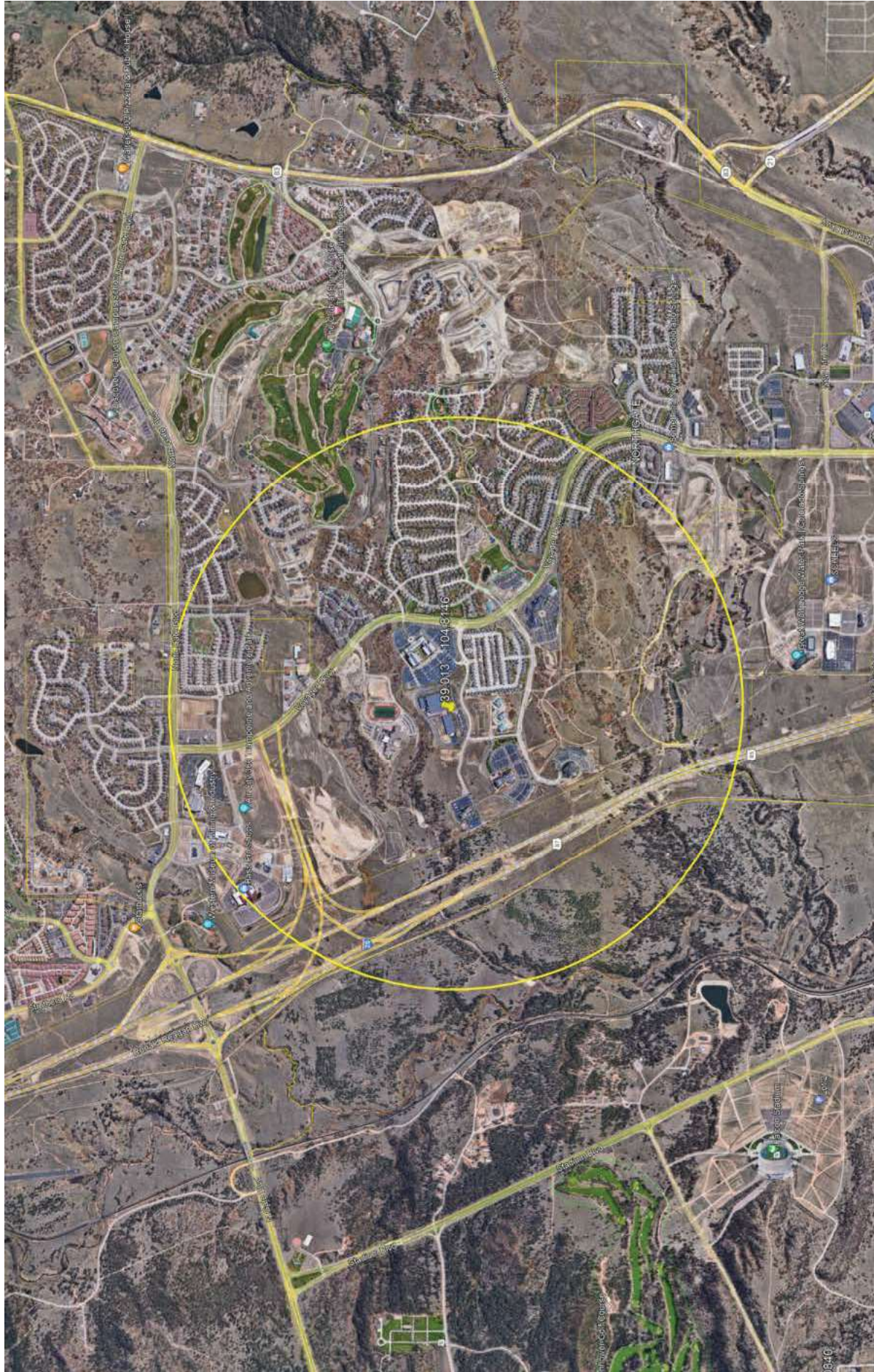
Table 13. Total Emissions for all New Engines

Pollutant	Hourly PTE (lb/hr)	Annual PTE	
		(lb/yr)	(tpy)
VOC	2.7	1,357.2	0.68
NO _x	10.9	5,428.7	2.71
CO	28.7	14,325.6	7.16
PM	1.7	874.6	0.44
PM ₁₀	1.7	874.6	0.44
PM _{2.5}	1.7	874.6	0.44
SO ₂	0.1	30.2	0.02
HAP	0.1	50.5	0.03

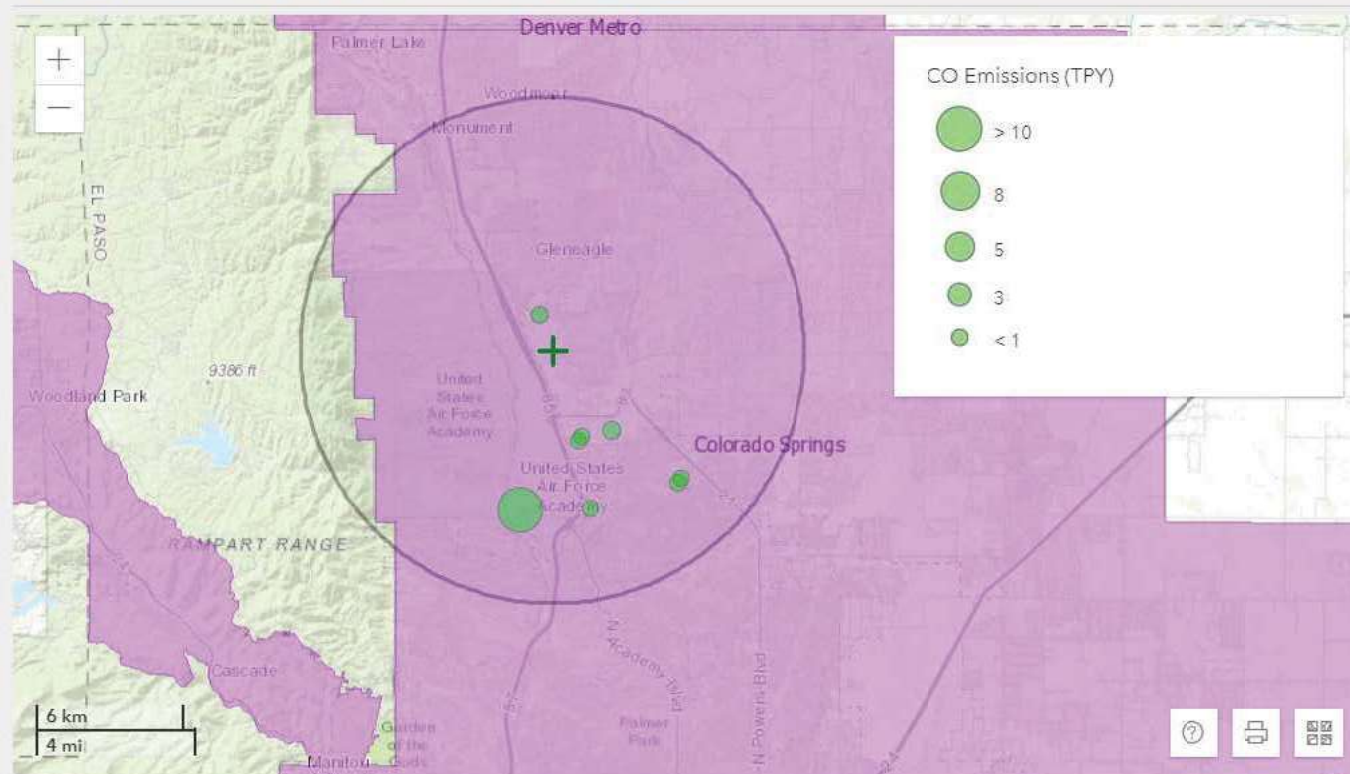
Point Source Information as Requested by CDPHE

Information Requested by CDPHE	Response
AIRS ID Number	041-1620
Facility latitude/longitude	39.014050, -104.814481 (General plant location)
Release Parameters for Existing Equipment – Gen1, Gen2, and Gen3	
Source release height	4.57 m (located on building's north roofline)
Stack gas exit temp	770 K
Stack gas exit velocity	253 m/s
Stack inside diameter	0.2 m
Capped, J-tube, or Horizontal release?	Horizontal
Release Parameters for New Equipment – Gen4, Gen5, and Gen6 (all to be connected to SCR)	
Source release height	4.57 m (to be located on building's north roofline)
Stack gas exit temp	781 K
Stack gas exit velocity	12,925 kg/hr
Stack inside diameter	TBD
Capped, J-tube, or Horizontal release?	Horizontal

Topographical Site Map



Queried Sources of Air Pollution



- ☐ O3 8-hr NAA (2015 NAAQS): ☐ ☐ O3 8-hr NAA (2008 NAAQS): ☐ ☐ O3 1-hr AMA: ☐
☐ PM10 AMA: ☐ ☒ CO AMA: ☒ ☐ Tribal land: ☐
☐ Mandatory class 1 Federal areas: ☐

This map returns an inventory of stationary sources of air pollution based on origin coordinates, radius, and pollutant. To learn more about using this product, and other features of this product, click the help [?] icon on the lower right corner of the map.

Query at Longitude -104.8145 and Latitude 39.0141 for CO sources within a 10(km) radius with emissions >0(TPY) returned:
8 sources; 23.443(TPY) total emissions

Attachment E
Facility Emissions Inventory

Facility Wide Emissions Inventory Form

Ver. September, 2019



Company Name: Novva Colorado, LLC

Source Name: Colorado Springs

Source AIRS ID: 041-1620

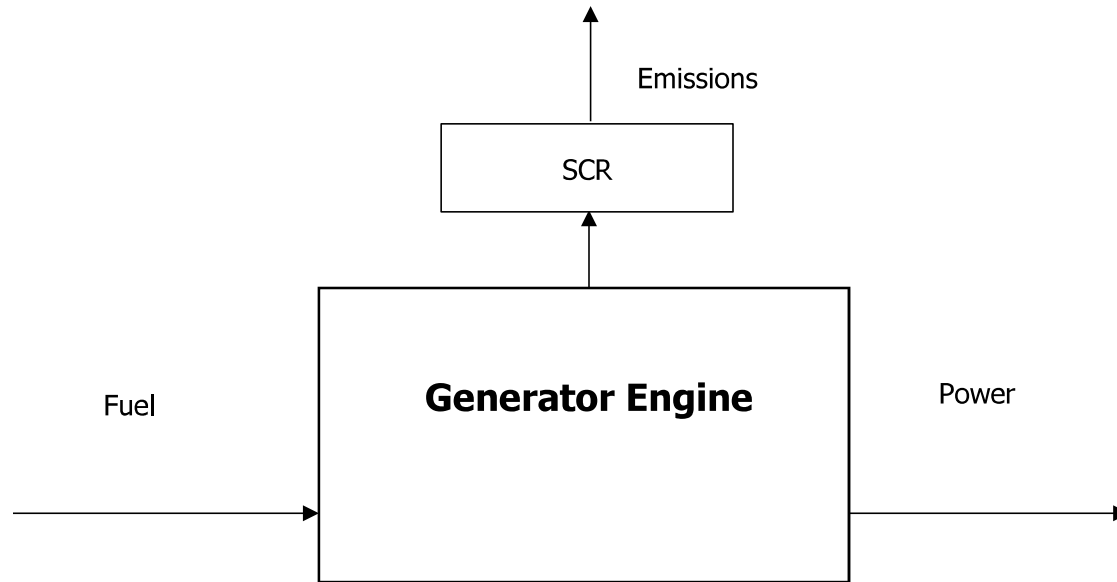
			Uncontrolled Potential to Emit (PTE)																Controlled Potential to Emit (PTE)																						
			Criteria (TPY)						HAPs (lbs/yr)										Criteria (TPY)						HAPs (lbs/yr)																
AIRS ID	Permit No.	Description	TSP	PM10	PM2.5	FUG. TSP	FUG. PM10	FUG. PM2.5	SO2	NOx	VOC	CO	Benzene	Toluene	EB	Xylene	n-Hex	HCHO	TSP	PM10	PM2.5	FUG. TSP	FUG. PM10	FUG. PM2.5	SO2	NOx	VOC	CO	Benzene	Toluene	EB	Xylene	n-Hex	HCHO							
TBD	TBD	Generator 4	0.15	0.15	0.15				5.03E+03	9.09	0.23	2.39	8.30	3.00		2.06		0.84	0.15	0.15	0.15				5.03E+03	0.90	0.23	2.39	8.30	3.00		2.06		0.84							
TBD	TBD	Generator 5	0.15	0.15	0.15				5.03E+03	9.09	0.23	2.39	8.30	3.00		2.06		0.84	0.15	0.15	0.15				5.03E+03	0.90	0.23	2.39	8.30	3.00		2.06		0.84							
TBD	TBD	Generator 6	0.15	0.15	0.15				5.03E+03	9.09	0.23	2.39	8.30	3.00		2.06		0.84	0.15	0.15	0.15				5.03E+03	0.90	0.23	2.39	8.30	3.00		2.06		0.84							
Permitted Sources Subtotal =			0.5	0.5	0.5	0.0	0.0	0.0	0.0	27.3	0.7	7.2	25	9	0	6	0	3	0.5	0.5	0.5	0.0	0.0	0.0	0.0	2.7	0.7	7.2	25	9	0	6	0	3							
APEN Only - Permit Exempt Sources																																									
041-1620-001	N/A	Generator 1	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88							
041-1620-002	N/A	Generator 2	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88							
041-1620-003	N/A	Generator 3	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88	0.92	0.92	0.92				0.01	16.01	0.39	0.58	8.68	3.14		2.16		0.88							
APEN Only Subtotal =			2.76	2.76	2.76	0.00	0.00	0.00	0.03	48.03	1.17	1.74	26.04	9.42	0.00	6.48	0.00	2.64	2.76	2.76	2.76	0.00	0.00	0.00	0.03	48.03	1.17	1.74	26.04	9.42	0.00	6.48	0.00	2.64							
APEN Exempt / Insignificant Sources																																									
Insignificant Subtotal =			0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0	0	0	0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0	0	0	0	0	0							
Total, All Sources =			3.2	3.2	3.2	0.0	0.0	0.0	0.0	75.3	1.9	8.9	51	18	0	13	0	5	3.2	3.2	3.2	0.0	0.0	0.0	0.0	50.7	1.9	8.9	51	18	0	13	0	5							
Uncontrolled HAPs Summary (TPY) =															0.0	0.0	0.0	0.0	0.0	0.0	Controlled HAPs Summary (TPY) =															0.0	0.0	0.0	0.0	0.0	0.0
Uncontrolled Total, All HAPs (TPY) =															0.0	Controlled Total, All HAPs (TPY) =															0.0										

Footnotes:

- This form should be completed to include both existing sources and all proposed new or modifications to existing emissions sources
- If the emissions source is new then enter "proposed" under the Permit No. and AIRS ID data columns
- Add and/or replace HAPS and other Non-Criteria Reportable Pollutants as necessary. HAP abbreviations include:
EB = Ethylbenzene Acro = Acrolein
HCHO = Formaldehyde n-Hex = n-Hexane
224-TMP = 2,2,4-Trimethylpentane Meth = Methanol
Acetal = Acetaldehyde
- APEN Exempt/Insignificant Sources should be included when warranted.

Attachment F
Flow Diagram and Plot Plan

Process Flow Diagram



Attachment G
Environmental Justice Report & CDPHE Concurrence



COLORADO

Air Pollution Control Division

Department of Public Health & Environment

Anthony Guslin
Novva Colorado, LLC
Colorado Springs Facility
080410072011

November 28, 2023

Dear Anthony Gustin,

We have reviewed the complete Environmental Justice Summary submitted on November 21, 2023 for the Colorado Springs facility in census block group 080410072011. Based on this information, the facility is not located in a Disproportionately Impacted Community. You can now move forward with submitting your permit application to the Air Pollution Control Division.

Please include this full document as part of your permit application package. It includes the Environmental Justice Summary information you submitted, as well as this letter of concurrence. The Environmental Justice Summary is part of the permit record. If the main permit application does not include this letter of concurrence and the information attached, it may be rejected as incomplete.

Please note: Sources with any quantifiable amount of *new or modified emissions* of nitrogen oxides (NO_x), sulfur dioxide (SO₂), particulate matter ≤ 2.5 microns in diameter (PM_{2.5}), carbon monoxide (CO), or BTEX (benzene, toluene, ethylbenzene, and/or xylene) must also submit APCD Form-114 to the Permit Modeling Unit *prior* to submitting their permit application. Learn more about when APCD Form-114 is required and explore Colorado [modeling guidance](#) for air quality permits.

If you have any questions about the Environmental Justice Summary, please email cdphe_apcd_ejreports@state.co.us.

Thank you,

Air Pollution Control Division's Environmental Justice in Permitting Team



Environmental Justice Report

Applicant Information

Company Name: Novva Colorado, LLC

Facility Name: Colorado Springs

Plant AIRS ID Number:

Permit Type:

Permit Number:

Facility location used for generating the report: 39.013 , -104.8146

Environmental Justice Summary

El Paso County

Census Block Group 080410072011

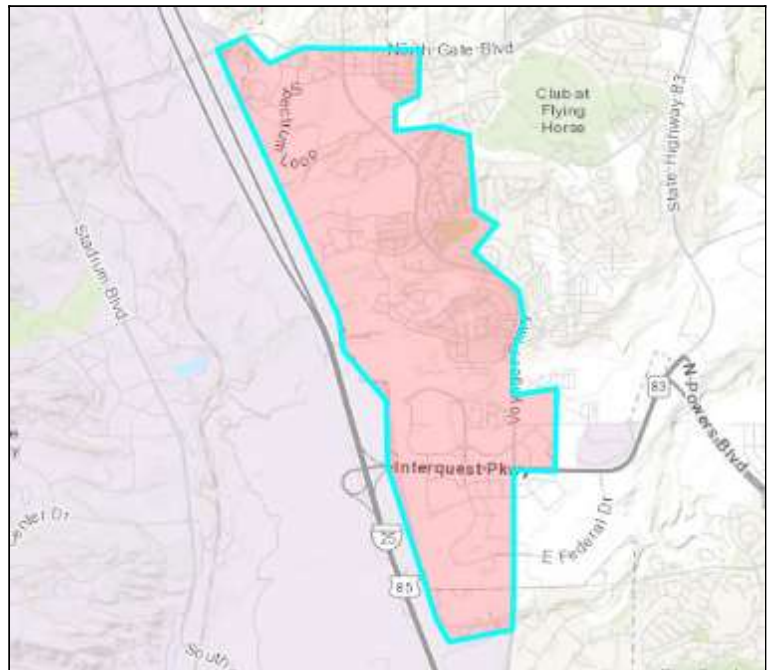
Air Quality Reg. 3 Disproportionately Impacted (DI) Community

No

Air Quality Reg. 3 Community Type

Not Disproportionately Impacted

Low-income Population	21.5%
People of Color Population	21.7%
Limited English Proficiency Population	0%
Housing Cost Burdened Population	33.7%
CO EnviroScreen Percentile Score	38.36



Environmental Justice Overview

Environmental Exposures Percentile Score 39.38

The environmental exposures score represents a community's exposure to certain environmental risks relative to the rest of the state. The score ranges from 0 to 100, with higher scores indicating higher burden. The environmental exposures score does not cover all pollutants; it is the average of data on diesel particulate matter, traffic proximity, ozone, PM 2.5, air toxics, other air pollutants, lead exposure risk, drinking water violations, and noise.

Environmental Effects Percentile Score 30.49

The environmental effects score represents how many hazardous or toxic sites are in a community relative to the rest of the state. The score ranges from 0 to 100, with a higher score indicating higher burden. The score is the average of data on proximity to mining, oil and gas operations, impaired surface waters, wastewater discharge facilities, Superfund sites, facilities that use hazardous chemicals, and facilities that generate, treat, store, or dispose of hazardous wastes.

Climate Vulnerability Percentile Score 71.4

The climate burden score represents a community's risk of drought, flood, extreme heat, and wildfire compared to the rest of the state. The score ranges from 0 to 100, the higher the score, the higher the burden.

Sensitive Populations Percentile Score 23.13

The sensitive populations score captures how at risk a community is to environmental exposures and climate impacts as it relates to health. For example, air pollution has stronger impacts on older and younger people, and people with chronic conditions such as asthma. The score ranges from 0 to 100, with a higher score being worse. The score is calculated using data on asthma hospitalization rate, cancer prevalence, diabetes prevalence, heart disease prevalence, life expectancy, low birth weight rate, mental health, population over 65, and population under 5.

Demographics Percentile Score 47.62

The demographics score represents a community's social and economic vulnerabilities. The score ranges from 0 to 100, with a higher number representing a higher vulnerability. It is calculated using data on people living with disabilities, housing cost burden, educational attainment, limited English proficiency, income, and race and ethnicity.

Pollution and Climate Indicators

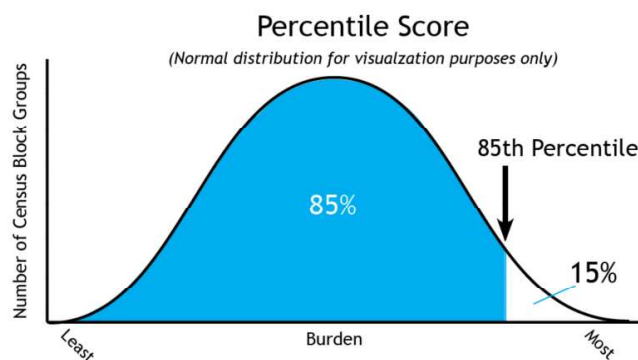
Indicator	Original Unit of Measure	Percentile
Air Toxics Emissions	distance weighted measure of estimated air toxics emissions	61.18
Diesel Particulate Matter	micrograms per cubic meter	30.16
Drinking Water Regulations	population weighted duration (in weeks) of resolved and unresolved health based violations from active community public water systems	42.81
Fine Particle Pollution (PM 2.5)	micrograms per cubic meter	24.07
Impaired Streams and Rivers	average impairment and assessment status of streams	65.02
Lead Exposure Risk	percentage of housing units built before 1960, as an indicator of potential exposure to lead	22.2
Noise	decibels A	28.88
Other Air Pollutants	distance weighted measure of estimated other air pollutant emissions	86.04
Ozone	parts per billion	86.81
Proximity to Hazardous Waste Facilities	distance weighted count of hazardous waste facilities within 5 km	22.2
Proximity to Mining Locations	distance weighted measure of the total number of active coal, hard rock, and construction materials mining permits	83.46
Proximity to National Priorities List Sites	distance weighted count of proposed or listed NPL sites with 5 km	23.1
Proximity to Oil and Gas	distance weighted measure of the total number of active oil and gas locations	86.98
Proximity to Risk Management Plan Sites	distance weighted count of RMP facilities within 5 km	16.36
Traffic Proximity and Volume	amount of vehicular traffic nearby, and distance from roads	59.29
Wastewater Discharge Indicator	toxic chemical concentrations in stream segments per km	78.78
Drought	sum of weekly total percent of an area experiencing a severe, extreme, or exceptional drought	79.53
Extreme Heat Days	average number of high heat days between May and September from 2016 to 2020	25.4
Floodplains	percentage of each geographic area where there is at least a one percent chance of flooding annually	68.54
Wildfire Risk	mean wildfire hazard potential within each geographic area as determined by the US Forest Service, 2021	87.23

Health and Social Indicators

Indicator	Original Unit of Measure	Percentile
Asthma Hospitalization Rate	rate of hospitalization per 100,000 people	9.77
Cancer Prevalence	percent of adults	41.19
Diabetes Prevalence	percent of adults	28.11
Heart Disease in Adults	percent of adults	67.92
Life Expectancy	years	34.24
Low Birth Weight	percent of singleton births	31.02
Mental Health Indicator	percent of adults	14.55
Population over 64 years of age	percent of total population	19.11
Population under 5 years of age	percent of total population	55.21
Disability	percent of total population	29.11
Housing Cost Burdened	percent of total population	61.71
Less Than High School Education	percent of total population	34.94
Linguistic Isolation	percent of total population	54.42
Low Income	percent of total population	45.6
People of Color	percent of total population	44.68

Understanding the Data

The values shown in the Pollution and Climate Indicator and Health and Social Indicator tables are percentiles. Percentiles are a way to see how one area compares to other areas in Colorado. Percentile values range from 0 - 100. A higher score indicates higher burden. Specifically, the percentile tells you the percentage of places in Colorado that have a lower score than the selected location. For example, an area with 85 percentile score for the noise indicator, ranks in the top 15% of areas impacted by noise in Colorado. That means that 85% of the other Census Block Groups in Colorado have a lower score for noise impacts.



The data in the report comes from Colorado EnviroScreen version 1.0. Developed in 2022 by CDPHE and Colorado State University, EnviroScreen maps the overlap of environmental exposures and effects, climate vulnerability, sensitive

populations, and demographics to better understand environmental injustice and environmental health risks in Colorado. For more detailed information on the data sources used in Colorado EnviroScreen Version 1.0 see the [technical documentation](#).

On the first page of the report, red text highlights if values for a census block group meet or exceed the criteria for definition of Disproportionately Impacted Community for Air Quality Regulation 3. On subsequent pages of the report, red text highlights indicators in the top percentiles for Colorado that may warrant additional consideration during the permitting process. The Environmental Justice Report is not intended to show individual health risk or exposure.

In the Environmental Justice Summary on the first page, values shown in red indicate a census block group that meets or exceeds the following criteria to qualify as a Disproportionately Impacted (DI) Community for Air Quality Reg 3:

- Over 40% of households are low-income (meaning they are at or below 200% of the federal poverty level),
- 40% of the population identify as people of color,
- 50% of households are housing-cost burdened (meaning they spend more than 30% of household income on housing costs), or
- 20% of the population is linguistically isolated (meaning no adults in a household speak English well).

A census block group that meets or exceeds any of these percentages is labeled as a Socioeconomically Vulnerable Community (SVC).

The CO EnviroScreen Percentile Score, which is also found on the first page of the Environmental Justice Report, is written in red if it is above the 80th percentile. A census block group with a CO EnviroScreen Score above the 80th percentile is labeled as a Cumulatively Impacted Community (CIC).

In other sections of the Environmental Justice Report, including the Environmental Justice Overview, Pollution and Climate Indicators, and Health and Social Indicators sections, indicator and component scores over the 80th percentile are also highlighted in red. The 80th percentile threshold is used in most cases to flag census block groups that have indicators and groups of indicators (components) that are in the top 20% of census block groups in Colorado. These indicators and components are flagged because they may warrant further review in the permitting process by the permit applicant and/or the Division staff reviewing the permit.

As explained on page 11 of the User Guide, for most indicators, the indicator is highlighted in red if it is above the 80th percentile to indicate that the census block group where the facility is located faces higher risks based on that indicator compared to other Colorado communities. However, less than 20% of census block groups in Colorado have oil and gas facilities or mining locations. Accordingly, all census block groups in Colorado score above the 80th percentile for proximity to these two types of facilities because even having zero facilities puts a community in the top 20%. Accordingly, the Environmental Justice Report highlights a census block group in red if it is above the 85th percentile for mining facilities and above the 90th percentile for oil and gas facilities. This ensures that only census block groups with a greater number of facilities than the statewide average of zero are highlighted on the EJ Report.

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Colorado EnviroScreen does:

- Show which areas in Colorado are more likely to have higher environmental health injustices.
- Identify areas in Colorado where government agencies can prioritize resources and work to reduce pollution and other sources of environmental injustice.
- Provide information to empower communities to advocate to improve public health and the environment.
- Identify areas that meet the updated definition of "Disproportionately Impacted Community" under House Bill 23-1233 adopted a definition that applies to all state agencies, including CDPHE.
- Identify areas where the Air Quality Regulation (Reg.) Number 3, which governs permitting in disproportionately impacted communities, applies.
- Identify areas that meet the prior definition of "Disproportionately Impacted Community" under the Colorado Environmental Justice Act (HB21-1266).

Colorado EnviroScreen does not:

- Define a healthy or unhealthy environment.
- Establish causal associations between environmental risks and health.
- Define all areas that may be affected by environmental injustice or specific environmental risks.
- Provide information about an individual person's health status or environment.
- Take all environmental exposures into account.
- Tell us about smaller areas within a census block group that may be more vulnerable to environmental exposures than other areas.
- Provide information about non-human health or ecosystem risks.

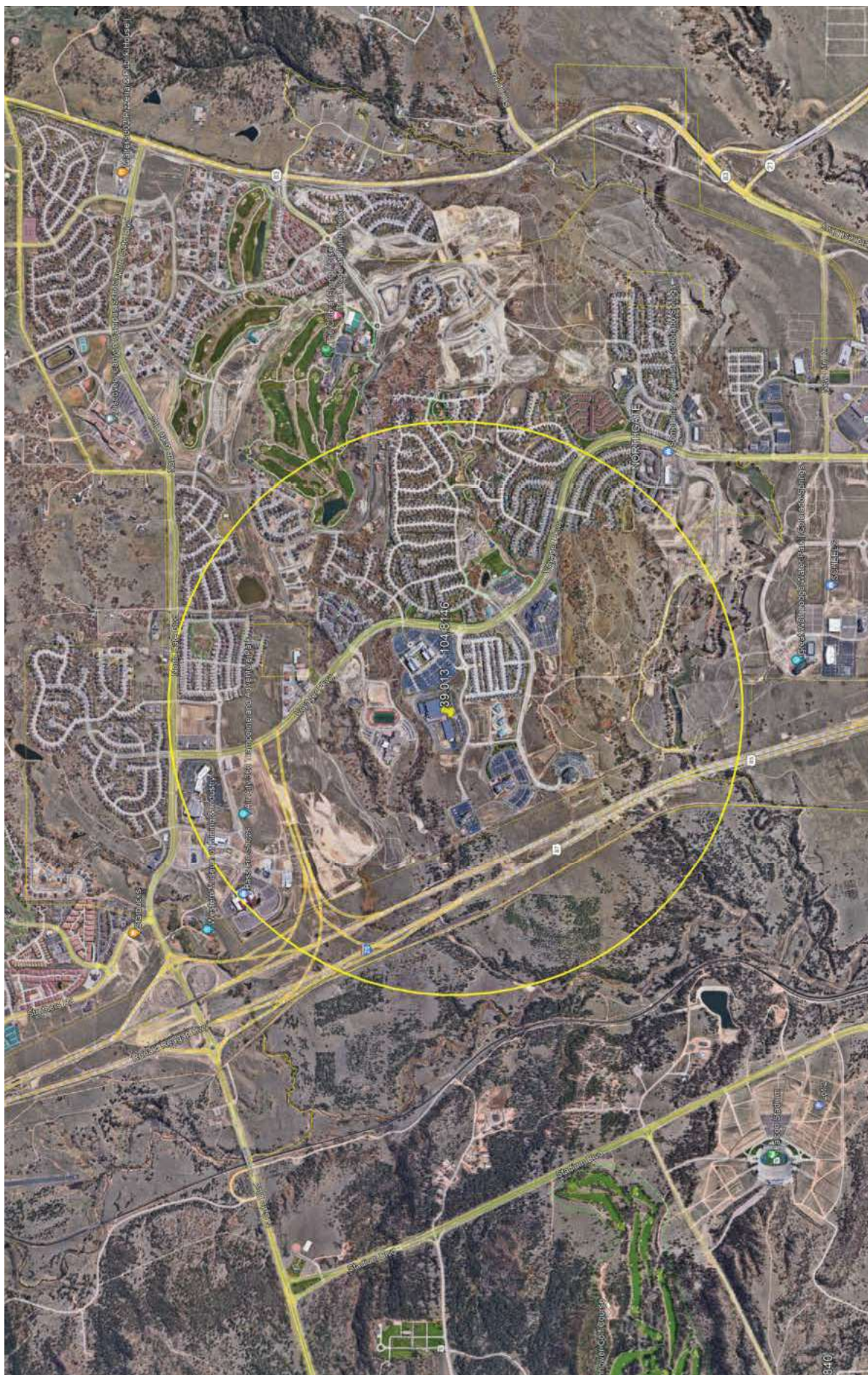
Additional Resources

[Frequently Asked Questions: Environmental Justice Report Tool for Air Quality Regulation 3](#)

[Air Pollution Control Division's Small Business Assistance Program](#)

[CDPHE Environmental Justice Program](#)

[Colorado EnviroScreen Version 1.0 Reports, Guides, and Resources Folder](#)



Environmental Justice Summary Supplemental Information for Air Quality Regulation 3

Air Pollution Control Division

Background: Under Colorado's Air Quality Regulation 3, an Environmental Justice Summary ("EJ Summary") is required for all applicable permit applications. This EJ Summary consists of:

1. **Environmental Justice Report ("EJ Report" - submitted separately as an email attachment to cdphe_apcd_ejreports@state.co.us).**
2. **Environmental Justice Summary Supplemental Information Form (this form).**
3. **Any additional supporting documentation (such as map images).**

You must submit a complete EJ Summary to the Air Pollution Control Division (APCD) for review and approval **before** submitting your main permit application. You will then receive a letter of concurrence from the Division's Environmental Justice in Permitting Specialist. The Environmental Justice Summary, including the Environmental Justice Report, is part of the permit record. If the main permit application does not include a letter of concurrence, it may be rejected as incomplete.

Additional information is available on the [EJ Report Tool website](#) and the [Guidance for Small Businesses website](#).

Note: If a [modeling determination \(form APCD-114\)](#) is required for this emission source, you should submit your modeling determination request at the same time you submit the Environmental Justice Summary by following the instructions on form APCD-114. If you are unsure whether a modeling determination is required for this emission source, please consult the [Air Pollution Control Division's website](#).

Note: Small businesses can contact the Air Pollution Control Division's Small Business Assistance Program for assistance: cdphe_apcd_sbap@state.co.us. For information about which businesses qualify for assistance as a small business, visit the program's [website](#).

A copy of your responses will be emailed to you upon form submission.

Email *

libbyhyde11@gmail.com

Section 1: Background Information (Company/Facility)

Company name *

Novva Colorado, LLC

Facility name (If the facility does not have a name, enter the company name.) *

Colorado Springs

Facility location (street address or coordinates) *

650 Sybilla Lane, Colorado Springs, CO 80921

Census block group(s) in which the facility is located (this information is found in the facility's Environmental Justice Report) *

080410072011

Which type of air permit will you be applying for? *

- ☐ Initial Title V Permit
- ☐ Title V Permit Renewal or Modification
- ☐ General Permit
- ☐ Unsure
- ☒ Other: Non-Title V Permit

Has this facility previously received an official permit or exemption letter from the Air Pollution Control Division (APCD)? *

- ☒ Yes
- ☐ No
- ☐ Unsure

Section 1: Background Information (Company/Facility)

What is the AIRS ID of this facility? (The AIRS ID number will be listed on the permit or exemption letter. It is seven or ten digits, usually written "XXX-XXXX" or "XXX-XXXX-XXX"). *

041-1620

What is the permit number or exemption number? *

N/A

Section 2: Company/Facility Contact Information

Company representative name *

Anthony Gustin

Company representative phone number *

385-415-9065

Company representative email address *

a.gustin@novva.com

Company representative name #2 (optional)

Nick Paolo

Company representative phone number #2 (optional)

303-810-1085

Company representative email address #2 (optional)

npaolo@smithppi.com

Section 3: Environmental Justice Requirements

The Environmental Justice Report Tool and how-to instructions are available on the Air Pollution Control Division's [website](#). Please run a report for your facility to answer the questions below.

Based on the Environmental Justice Report generated, is this facility located in a Disproportionately Impacted (DI) Community? *

☐ Yes

☒ No

Section 3: Environmental Justice Requirements

What type of Disproportionately Impacted (DI) Community is the facility located in based on the Environmental Justice Report? *

☐ Cumulatively Impacted (CI) Community only

☐ Socioeconomically Vulnerable (SV) Community only

☐ Both a Cumulatively Impacted (CI) Community and a Socioeconomically Vulnerable (SV) Community

Section 4: Description of Proposed Permit Application

Will this facility emit any Affected Pollutants? (Check all that apply.) *

- ☒ Volatile organic compounds (VOCs)
- ☒ Nitrogen oxides (NOx)
- ☒ Particulate matter ≤ 2.5 microns in diameter (PM2.5)
- ☒ Benzene
- ☒ Toluene
- ☐ Ethylbenzene
- ☒ Xylene
- ☐ Unsure
- ☐ Not applicable

Describe the proposed permit application, **including the estimated emission rates** (in tons per year) of any and all Affected Pollutants. For each Affected Pollutant, clearly state whether the estimated emissions would be a net increase, net decrease, or no change. If estimated emission rates of Affected Pollutants will remain the same, please still provide those estimates below. *

Please provide this information **even if your facility is not located in a Disproportionately Impacted Community**. (Note: Please **do not** send this information as additional attachments. Provide the information requested as a short plain language summary below.)

Novva Colorado, LLC is proposing to install three (3) new 2,200kW diesel-fired emergency generators.

Estimated emission increases from the project are:

VOC = 0.68 tpy

NOx = 2.71 tpy

PM2.5 = 3.19 tpy

Benzene = 0.012 tpy

Toluene = 0.0045 tpy

Xylene = 0.0031 tpy

Is the proposed permit application for a new source or modification to an existing source that will increase emissions of Affected Pollutants in a Disproportionately Impacted Community? *

☐ Yes

☒ No

Describe any mitigation measures and/or changes to the proposed emission sources that were made based on the results of the facility's Environmental Justice Report and Summary, if any (such as enhanced monitoring, recordkeeping, and/or reporting). (Note: If you prefer to send this as an email attachment to cdphe_apcd_ejreports@state.co.us, write "Will send via email." If the facility is not located in a Disproportionately Impacted Community, write "N/A.") *

N/A

Describe any emission reduction strategies that were considered in relation to the Colorado EnviroScreen indicator data, if any (i.e., information in the facility's Environmental Justice Report). (Note: If you prefer to send this as an email attachment to cdphe_apcd_ejreports@state.co.us, write "Will send via email." If the facility is not located in a Disproportionately Impacted Community or no such mitigation measures or changes were made, write "N/A.") *

N/A

Describe any changes that were made to the originally-planned source equipment or operations based on engagement with and assessment of the Disproportionately Impacted Community, if any. (Note: If you prefer to send this as an email attachment to cdphe_apcd_ejreports@state.co.us, write "Will send via email." If the facility is not located in a Disproportionately Impacted Community or no such changes were made, write "N/A.") *

N/A

I acknowledge that, if applicable, I provided complete answers to the questions above in this section OR I will submit a summary of the information requested in the questions above to cdphe_apcd_ejreports@state.co.us. *

☒ Yes

Section 5: Public Outreach

For facilities located in Disproportionately Impacted Communities, the Air Pollution Control Division encourages thoughtful and culturally-sensitive enhanced public outreach by the facility to keep communities informed and engaged with the latest information. This includes any engagement with members of the Disproportionately Impacted Community who reside within one mile of the proposed Affected Construction Source or frequent an Occupied Area within one mile of the proposed Affected Construction Source, unless the Occupied Area is under the control of the proposed Affected Construction Source's owner/operator.

You can explore community engagement, outreach, and public participation tips and best practices on [CDPHE's website](#).

Did the owner/operator of the facility conduct or plan to conduct enhanced community outreach to the impacted community prior to submitting the main permit application? *

☐ Yes

☒ No

Provide a summary of community outreach the owner/operator of the facility conducted, or plans to conduct, if any. (Note: If you prefer to send this as an email attachment to cdphe_apcd_ejreports@state.co.us, write "Will send via email." If the facility is not located in a Disproportionately Impacted Community or no such engagement will be conducted, write "N/A.") *

N/A

Describe any other considerations intended to facilitate the fair treatment and meaningful involvement of Disproportionately Impacted Community members, if any. (Note: If you prefer to send this as an email attachment to cdphe_apcd_ejreports@state.co.us, write "Will send via email." If the facility is not located in a Disproportionately Impacted Community or no such considerations have been implemented, write "N/A.") *

N/A

I acknowledge that, if applicable, I provided complete answers to the questions above in this section OR I will submit a summary of community outreach the facility conducted, or plans to conduct, to cdphe_apcd_ejreports@state.co.us. *



Yes

Section 6: Acknowledgements and Supplement Submission

To submit a complete Environmental Justice Summary to the Division, email the following documents to cdphe_apcd_ejreports@state.co.us before or after submitting this online form.

1. Facility's Environmental Justice Report generated by the Environmental Justice Report Tool.
2. If this facility is located in a Disproportionately Impacted (DI) Community, a summary of any community outreach activities conducted or planned as mentioned in Section 5.
3. Any additional supporting documentation (such as aerial or satellite map images).

I acknowledge that I will submit a complete Environmental Justice Summary to the Air Pollution Control Division prior to submitting the main permit application. *



Yes

I acknowledge that, if applicable, I must also submit a completed Form APCD-114 prior to submitting the main permit application. (Information on Form APCD-114 can be found [here](#)). *

☒ Yes

I acknowledge that I must submit an aerial or satellite image of the location of the facility as documentation of any Occupied Areas not within Owner/Operator control within one mile of the Source, to cdphe_apcd_ejreports@state.co.us. Instructions on how to submit this image are available on [the Air Pollution Control Division's website](#). *

☒ Yes

This form was created inside of State.co.us Executive Branch.

Google Forms

STATE OF
COLORADO

Underriner - CDPHE She Her, Kit <kit.underriner@state.co.us>

Fwd: Novva Colorado Springs GP-06 Application (2024-1021)

4 messages

CDPHE APCD APEN Unit <cdphe_apcd_apen_forms@state.co.us>

Thu, Nov 21, 2024 at 2:29 PM

To: Kit Underriner - CDPHE She Her <kit.underriner@state.co.us>

----- Forwarded message -----

From: **APCD SSP Application - CDPHE, CDPHE** <cdphe_apcd_ssp_application@state.co.us>

Date: Thu, Nov 21, 2024 at 12:35 PM

Subject: Fwd: Novva Colorado Springs GP-06 Application (2024-1021)

To: CDPHE_ APCD_ APEN_ Forms - CDPHE <cdphe_apcd_apen_forms@state.co.us>

Hello APEN team, would anyone be able to help with this request?

Thank you,
Sarah

----- Forwarded message -----

From: **Clara Wayman** <Clara.Wayman@trinityconsultants.com>

Date: Wed, Nov 20, 2024 at 5:04 PM

Subject: RE: Novva Colorado Springs GP-06 Application (2024-1021)

To: cdphe_apcd_ssp_application@state.co.us <cdphe_apcd_ssp_application@state.co.us>

Cc: Johnathan Price <Johnathan.Price@trinityconsultants.com>, Libby Hyde <Libby.Hyde@trinityconsultants.com>,

Sophia Gump <s.gump@novva.com>, Anthony Gustin <a.gustin@novva.com>

Hello,

Here are the serial numbers for three new stationary generators at Novva's Colorado Springs facility. Are you able to provide a completeness determination?

<u>Model</u>	<u>Serial #</u>
3516	GZS00528
3516	GZS00532
3516	GZS00529
mtu 16V4000 ds2000	95030503827
mtu 16V4000 ds2000	95030503826
mtu 16V4000 ds2000	95030503825

Best,

Clara Wayman

Associate Consultant

Trinity Consultants, Inc.

Mobile: 801.633.1229

4525 Wasatch Blvd, Suite 200, [Salt Lake City, Utah 84124](#)

Email: clara.wayman@trinityconsultants.com



From: Clara Wayman

Sent: Monday, October 21, 2024 6:10 PM

To: cdphe_apcd_ssp_application@state.co.us

Cc: Johnathan Price <Johnathan.Price@trinityconsultants.com>; Libby Hyde <Libby.Hyde@trinityconsultants.com>;

Sophia Gump <s.gump@novva.com>; Anthony Gustin <a.gustin@novva.com>

Subject: Novva Colorado Springs GP-06 Application (2024-1021)

Hello,

Novva Colorado, LLC is submitting this general permit (GP-06) application for the proposed installation of three new stationary generators at their facility in Colorado Springs. Please see attached for the GP-06 application, fee payment receipt, and letter of concurrence satisfying Environmental Justice submittal requirements. Form APCD-114 was submitted on May 1, 2024 and the modeling determination is included in Appendix D of the application.

Please let me know if there are any questions regarding this submittal.

Thank you,

Clara Wayman

Associate Consultant

Trinity Consultants, Inc

P 801.633.1229

Email: clara.wayman@trinityconsultants.com

[4525 S Wasatch Blvd, Salt Lake City, UT 84124](#)



Connect with us: [LinkedIn](#) / [YouTube](#) / trinityconsultants.com

View our capabilities in the [Environmental Consulting](#), [Built Environment](#), [Life Sciences](#), and [Water & Ecology](#) markets.

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APEN Unit
Stationary Sources



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

4300 Cherry Creek Drive South, Denver, CO 80246-1530
cdphe_apcd_apen_forms@state.co.us | www.colorado.gov/cdphe/apcd

As of January 1, 2014, the Colorado Air Pollution Control Division no longer accepts blank or incomplete APENs. If an APEN is filled out incorrectly, is missing information, or lacks payment for the filing fee, it will be rejected and the re-submittal will require a new filing fee. Please note that all APEN submissions should be completed using forms currently supplied by the Division (See Reg. 3, Part A, Section II.A). Current APEN forms can be found at: cdphe.colorado.gov/apens-and-air-permits

Underriner - CDPHE She Her, Kit <kit.underriner@state.co.us>

Thu, Dec 5, 2024 at 3:42 PM

To: Clara.Wayman@trinityconsultants.com

Cc: s.gump@novva.com, a.gustin@novva.com

Hi Clara,

I was forwarded this email from our application intake person. I have reviewed the application that was submitted and it is not complete. Engines covered by GP06 cannot be source grouped, each engine will need its own GP06 coverage.

In order to process this application there are a couple of options:

1. Individual APENs (1 per engine) can be emailed to me. I can then invoice for the missing APEN fees and GP fees (\$1,665.80 x2) when the approval letters are issued.
2. The engines can be covered by a construction permit and stay grouped together. The GP fee that was paid will be refunded when the permit is issued.

Please let me know how the applicant would like to proceed.

Thanks,

[Quoted text hidden]

--

Kit Underriner
APEN Unit Work Lead
Stationary Sources Program



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

P 720.288.0599 | F 303.782.0278

4300 Cherry Creek Drive South, Denver, CO 80246-1530

katherine.underriner@state.co.us | www.colorado.gov/cdphe/apcd

As of January 1, 2014, the Colorado Air Pollution Control Division no longer accepts blank or incomplete APENs. Incomplete APENs will be rejected and will require re-submittal. APENs will be rejected if they are filled out incorrectly, missing information, or lacking payment for the appropriate fee(s). The re-submittal will require new payment for the appropriate fee(s). Please note that all APEN submissions should be completed using forms currently supplied by the Division (See Reg. 3, Part A, Section II.A). Current APEN forms can be found at: <https://www.colorado.gov/cdphe/APENforms>

Clara Wayman <Clara.Wayman@trinityconsultants.com>

Thu, Dec 19, 2024 at 10:06 AM

To: "Underriner - CDPHE She Her, Kit" <kit.underriner@state.co.us>

Cc: "s.gump@novva.com" <s.gump@novva.com>, "a.gustin@novva.com" <a.gustin@novva.com>, Johnathan Price <Johnathan.Price@trinityconsultants.com>

Hey Kit,

Attached are the individual APENs for the three new stationary generators proposed at Novva's facility in Colorado Springs. Each engine has an *NSPS – 40 CFR Part 60, Subpart IIII Applicability APEN Addendum form for Diesel Engines* form and a *Compression Ignition Engine APEN form APCD-233*.

Please let us know once these have been received.

Do not hesitate to reach out with any questions.

Clara Wayman

Consultant

Trinity Consultants, Inc.

Mobile: 801.633.1229

4525 Wasatch Blvd, Suite 150, [Salt Lake City, Utah](#) 84124

Email: clara.wayman@trinityconsultants.com



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6 attachments



APEN 95030503825 2024-1219.pdf
665K



APEN 95030503826 2024-1219.pdf
665K



APEN 95030503827 2024-1219.pdf
664K



NSPS 95030503825 2024-1219.pdf
181K



NSPS 95030503826 2024-1219.pdf
181K



NSPS 95030503827 2024-1219.pdf
181K

Underriner - CDPHE She Her, Kit <kit.underriner@state.co.us>

Thu, Dec 19, 2024 at 11:31 AM

To: Clara Wayman <Clara.Wayman@trinityconsultants.com>

Cc: "s.gump@novva.com" <s.gump@novva.com>, "a.gustin@novva.com" <a.gustin@novva.com>, Johnathan Price <Johnathan.Price@trinityconsultants.com>

Hi Clara,

Thanks for sending those over. I will get this application logged and sent over to permitting.

Let me know if you have any questions.

Thanks!

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