



CONSTRUCTION PERMIT

Permit Number: **25DG0038 (Issuance 1)**

Date Issued: **2/23/2026** **510737**

Issued To: **EdgeConneX, Inc.**

Facility Name: Denver Campus
Plant AIRS ID: 035-0815
Physical Location: 8451 Highfield Pkwy
County: Douglas County
General Description: Data center

Equipment or activity subject to this permit:

AIRS Point	Description
001	Eight (8) diesel-fueled internal combustion emergency engines: Make:.....MTU Model:.....12V1600 DS550 Design rating:822 horsepower (each) These engines are subject to NSPS Subpart IIII Tier 2 standards. See Attachment B for individual facility IDs and serial numbers.
002	One (1) diesel-fueled internal combustion emergency engine: Make:.....CAT Model:.....C18 Serial number: TBD Design rating: 900 horsepower This engine is subject to NSPS Subpart IIII Tier 2 standards. See Attachment B for individual facility ID.



AIRS Point	Description
003	Three (3) diesel-fueled internal combustion emergency engines: Make:..... CAT Model:..... 3516C Serial numbers:..... TBD Design rating: 3,147 horsepower (each) These engines are subject to NSPS Subpart IIII Tier 2 standards. See Attachment B for individual facility IDs.
004	Fifteen (15) diesel-fueled internal combustion emergency engines with selective catalytic reduction (SCR) controls: Make:..... CAT Model:..... 3516C Serial numbers:..... TBD Design rating: 3,147 horsepower (each) These engines are subject to NSPS Subpart IIII Tier 2 standards (prior to controls). See Attachment B for individual facility IDs.

These engines may be replaced with another engine in accordance with the temporary engine replacement provision or with another engine of the same model in accordance with the permanent replacement provision of the Alternate Operating Scenario (AOS), included in this permit as Attachment A.

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

REQUIREMENTS TO SELF-CERTIFY FOR FINAL APPROVAL

1. You must notify the Air Pollution Control Division (Division) no later than fifteen (15) days after commencement of operation of each engine under this permit by submitting a Notice of Startup (NOS) to the Division. The NOS must be submitted using the Division's online submission tool on [the Division's self-certification webpage](#). Failure to notify the Division of startup of the permitted source is a violation of AQCC Regulation Number 3, Part B, Section III.G.1, and can result in the revocation of the permit.

2. Within one hundred and eighty (180) days after commencement of operation of the engine(s) in each installation phase, compliance with the conditions contained on this permit must be demonstrated to the Division. It is the permittee's responsibility to self-certify compliance with the conditions. Failure to demonstrate compliance within 180 days may result in revocation of the permit or enforcement action by the Division. Information on how to certify compliance was mailed with the permit or can be obtained from the Division's website. Search for "Colorado air permit self-certification" in a search engine to find self-certification information. (Reference: Regulation Number 3, Part B, Section III.G.2.)
3. The portions of this permit pertaining to each engine installation phase will expire if the owner or operator of the source for which this permit was issued: (i) does not commence construction/modification or operation of each phase within eighteen (18) months after either, the date of issuance of this construction permit or the date on which such construction or activity was scheduled to commence as set forth in the permit application associated with this permit; (ii) discontinues construction for a period of 18 months or more; or (iii) does not complete construction within a reasonable time of the estimated completion date. The Division may grant extensions of the deadline per Regulation Number 3, Part B, Section III.F.4.b. (Reference: Regulation Number 3, Part B, Section III.F.4.)
4. Within one hundred and eighty (180) days after commencement of operation of the engine(s) in each installation phase, the operator must complete all initial compliance testing and sampling as required in this permit and submit the results to the Division as part of the self-certification process. (Reference: Regulation Number 3, Part B, Section III.G.2.)
5. The owner or operator must develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. Compliance with the O&M plan must commence at startup. Within one hundred and eighty 180 days after commencement of operation or issuance of this permit, whichever is later, the owner or operator must submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. Note that the Division may modify the monitoring requirements as part of the Title V Operating Permit if this facility is subject to Title V permitting. (Reference: Regulation Number 3, Part B, Section III.G.7.)
6. Within thirty (30) days after commencement of operation for each engine, the permit number and AIRS ID number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, Section III.E.) (State only enforceable.)
7. Points 002, 003, and 004: The serial number of the subject equipment must be provided to the Division within one hundred and eighty (180) days after commencement of operation of each engine. (Reference: Regulation Number 3, Part B, Section III.G.2.)

EMISSION LIMITATIONS AND RECORDS

8. The owner or operator must track emissions from all insignificant activities at the facility on an annual basis to demonstrate compliance with the facility emission limitations as indicated below. An inventory of each insignificant activity and associated emission calculations must be made available to the Division for inspection upon request. For the purposes of this condition, insignificant activities are defined as any activity or equipment, which emits any amount but does not require an Air Pollutant Emission Notice (APEN) or is permit exempt. (Reference: Regulation Number 3, Part C, Section II.E.)

Total emissions from the facility, including all permitted emissions and potential to emit from all insignificant activities, must be less than:

- a. 25 tons of NO_x per year.
9. Emissions of air pollutants must not exceed the following limitations (as calculated using the emission factors included in the “Notes to Permit Holder” section of this permit). Monthly records of the actual emission rates must be maintained by the applicant and be made available to the Division for inspection upon request. (Reference: Regulation Number 3, Part B, Section II.A.4.)

Annual Limits (tons per year):

AIRS Point	PM	PM₁₀	PM_{2.5}	NO_x	SO₂	VOC	CO	Emission Type
001	N/A	N/A	N/A	4.5	N/A	N/A	N/A	Point
002	N/A	N/A	N/A	0.8	N/A	N/A	N/A	Point
003	N/A	N/A	N/A	8.1	N/A	N/A	N/A	Point
004	N/A	N/A	N/A	10.1	N/A	N/A	N/A	Point

Compliance with the annual limits must be determined on a rolling twelve (12)-month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months’ data. The permit holder must calculate actual emissions each month and keep a compliance record on site or at a local field office with site responsibility for Division review.

The owner or operator must use the emission factors found in “Notes to Permit Holder” to calculate emissions and show compliance with the limits. The owner or operator must submit an Air Pollutant Emission Notice (APEN) and receive a modified permit prior to the use of any other method of calculating emissions.

10. The following control equipment must be maintained and operated to ensure satisfactory performance. The uncontrolled emissions must be reduced by at least the control efficiencies listed below. The owner or operator must monitor compliance with this condition through the results of approved compliance tests (when required), compliance with the Operating and Maintenance Plan, compliance records, and other methods as approved by the Division. (Reference: Regulation Number 3, Part B, Section III.E.)

AIRS Point	Control Device(s)	Controlled Pollutant(s)	Control Efficiency
004	Selective Catalytic Reduction	NOx	90.0%

PROCESS LIMITATIONS AND RECORDS

11. This source must be limited to the following maximum consumption, processing and/or operational rates as listed below. Monthly records of the actual process rate must be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation Number 3, Part B, Section II.A.4.)

Process/Consumption Limits:

AIRS Point	Process Parameter	Annual Limit
001	Operating hours	120 hours/engine
002	Operating hours	120 hours/engine
003	Operating hours	120 hours/engine
004	Operating hours	120 hours/engine

These engines are designated as emergency power generators, and therefore must only be operated to provide back-up power to the facility when electric power is interrupted, or for periodic maintenance and testing purposes.

Compliance with these operational limits must be demonstrated by installing a non-resettable hour meter on each engine and recording the hours of each engine's operation.

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

12. The following operating restrictions apply to each engine as referenced: (Reference: Regulation Number 3, Part B, Section III.D.1.c.)
- a. Operation of all engines for the purposes of maintenance and testing must only occur between the hours of 8 AM and 5 PM.
 - b. Points 002, 003, & 004: No more than one engine may be operated simultaneously for purposes of maintenance and testing.
 - c. Point 001: These engines must only be operated in the pairs as listed in the table below for purposes of maintenance and testing:

Operating Scenario	Facility ID Pairs
BA2_4	GENBA200 and GENBA400
BA1_3	GENBA100 and GENBA300
1_2	GEN01000 and GEN02000
3_4	GEN03000 and GEN04000

STATE AND FEDERAL REGULATORY REQUIREMENTS

13. Visible emissions must not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment visible emissions must not exceed thirty percent (30%) opacity for more than six minutes in any sixty (60) consecutive minutes. Opacity must be determined using EPA Method 9. (Reference: Regulation Number 1, Sections II.A.1. & 4.)
14. This source is subject to the odor requirements of Regulation Number 2. (State-only enforceable)
15. These engines are subject to the New Source Performance Standards requirements of Regulation Number 6, Part A, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) including, but not limited to, the following:
- [The requirements below reflect the rule language of 40 CFR Part 60, Subpart IIII published in the Federal Register on 1/30/2013. However, if revisions to this Subpart are published at a later date, the owner or operator is subject to the requirements contained in the revised version of 40 CFR Part 60, Subpart IIII.]
- a. Emissions of Non-Methane Hydrocarbons and Nitrogen Oxides combined shall not exceed 4.8 grams per horsepower hour.
 - b. Emissions of Carbon Monoxide shall not exceed 2.6 grams per horsepower hour.
 - c. Emissions of Particulate Matter shall not exceed 0.15 grams per horsepower hour.

- d. All fuel purchased shall meet the following specifications:
 - i. Sulfur content shall not exceed 15 ppm.
 - ii. Have a minimum cetane index of 40 or
Have a maximum aromatic compound content of 35% by volume.

Compliance shall be demonstrated by maintaining copies of the fuel specifications provided by the supplier on-site or in a readily accessible location and made available to the Division for inspection upon request.
 - e. All engines and control devices must be installed, configured, operated, and maintained according to the specifications and instructions provided by the engine manufacturer.
 - f. If engine is equipped with a diesel particulate filter, the filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. Records shall be kept of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit is approached.
 - g. If engine is used for emergency purposes, a non-resettable hour meter must be installed prior to start-up. (Reference: NSPS IIII, §60.4209(a).)
16. The owner or operator of this facility is subject to the following requirements of Regulation Number 6, Part A, Subpart A, General Provisions (40 CFR Part 60, Subpart A).
- a. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (Reference: Regulation Number 6, Part A. General Provisions from 40 CFR 60.11)
 - b. No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§60.12)
17. These engines are located in an ozone nonattainment or attainment-maintenance area, and are therefore subject to the Reasonably Available Control Technology (RACT) requirements of Regulation Number 3, Part B, Section III.D.2. The requirements of condition numbers 10 & 15 above were determined to be RACT for this source.



OPERATING & MAINTENANCE REQUIREMENTS

18. The owner or operator must develop an operating and maintenance (O&M) plan, along with a recordkeeping format, that outlines how the applicant will maintain compliance on an ongoing basis with the requirements of this permit. **Compliance with the O&M plan must commence at startup.** Within one hundred and eighty (180) days after commencement of operation or issuance of this permit, whichever is later, the owner or operator must submit the O&M plan to the Division. Failure to submit an acceptable operating and maintenance plan could result in revocation of the permit. Note that the Division may modify the monitoring requirements as part of the Title V Operating Permit if this facility is subject to Title V permitting. (Reference: Regulation Number 3, Part B, Section III.G.7.)

COMPLIANCE TESTING AND SAMPLING

Initial Testing Requirements

19. Within one hundred and eighty (180) days of startup of each engine, the owner or operator must demonstrate compliance with Condition 13, using EPA Method 9 to measure opacity from that engine. This measurement must consist of a minimum twenty-four (24) consecutive readings taken at fifteen (15) second intervals over a six (6) minute period. (Reference: Regulation Number 1, Sections II.A.1 & 4.)

Periodic Testing Requirements

20. Replacements of these units completed as Alternative Operating Scenarios may be subject to additional testing requirements as specified in Attachment A.

ADDITIONAL REQUIREMENTS

21. The permit number and AIRS ID number must be marked on the subject equipment for ease of identification. (Reference: Regulation Number 3, Part B, Section III.E.) (State-only enforceable)
22. A revised Air Pollutant Emission Notice (APEN) must be filed: (Reference: Regulation Number 3, Part A, Section II.C.)
 - a. By April 30 of the year following a significant increase in emissions. A significant increase in emissions is defined as follows:

For any criteria pollutant:

For sources emitting less than one hundred (100) tons per year, a change in actual emissions of five (5) tons per year or more, above the level reported on the last APEN submitted; or

For volatile organic compounds (VOC) and nitrogen oxide (NO_x) sources in an ozone non-attainment area emitting less than one hundred (100) tons of VOC or nitrogen oxides per year, a change in actual emissions of one (1) ton per year or more or five percent (5%), whichever is greater, above the level reported on the last APEN submitted; or



For sources emitting one hundred (100) tons per year or more of a criteria pollutant, a change in actual emissions of five percent (5%) or fifty (50) tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

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

For any non-criteria reportable pollutant:

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

- b. Whenever there is a change in the owner or operator of any facility, process, or activity.
 - c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment.
 - d. Whenever a permit limitation must be modified.
 - e. No later than thirty (30) days before the existing APEN expires.
23. The permit holder must construct and maintain exhaust stack heights as listed in the table below. (Reference: Regulation Number 3, Part B, Section III.E.)

Facility Equipment ID(s)	AIRS Point	Minimum stack height above ground level (feet)
GENBA100, GENBA200, GENBA300, GENBA400	001	10.76
GEN01000, GEN02000, GEN03000, GEN04000	001	12.17
GEN0Y100	002	9.51
GENAA100, GENAB100, GENAZ100	003	14.99
GENAC100, GENAD100, GENAE100, GENAF100, GENAG100, GENAH100, GENBA100, GENBB100, GENBC100, GENBD100, GENBE100, GENBF100, GENBG100, GENBH100, GENBZ100	004	14.99

24. Public access must be precluded in all areas within the modeling receptor exclusion zone as submitted with the modeling in the application and as shown in Attachment C. The exclusion zone must be fenced and posted with no trespassing signs. (Reference: Regulation Number 3, Part B, Section III.E.)
25. The terms, conditions and information contained in Attachment A are hereby incorporated into this permit and are enforceable as if fully set forth herein including, but not limited to, emission point description, emission factor summary, emission limits or other limitations, controls, and specific requirements. (Reference: Regulation Number 3, Part B, Section III.E.)

GENERAL TERMS AND CONDITIONS

26. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation Number 3, Part B, Section II.B. upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
27. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit is considered initial approval and does not provide "final" approval for this activity or operation of this source. Final approval of the permit must be secured from the APCD in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and AQCC Regulation Number 3, Part B, Section III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the APCD as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the "Requirements to Self-Certify for Final Approval" section of this permit.** The operator must retain the permit final approval letter issued by the Division after completion of self-certification with the most current construction permit.
28. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity(ies) specifically identified in this permit. If subsequent operations or testing at the source indicate the information supplied to obtain this permit and relied upon in the creation and issuance of this permit is inaccurate, the source must submit an application to modify the permit to address the inaccuracy(ies). (Reference: Regulation Number 3, Part B, Section III.E.)

Permit History

Issuance	Date	Description
Issuance 1	This Issuance	Issued to EdgeConneX, Inc. as initial approval to operate.

NOTES TO PERMIT HOLDER (AS OF DATE OF PERMIT ISSUANCE)

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the production/processing rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedance of any specific emission control regulation or any ambient air quality standard. A revised air pollutant emission notice (APEN) and application form must be submitted with a request for a permit revision. (Reference: Regulation Number 3, Part B, Section II.A.4.)

- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee must notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the [Common Provisions Regulation](#).
- 3) The emission levels contained in this permit are based on the following emission factors:

Emission Factors for AIRS Point 001:

Pollutant	Uncontrolled	Controlled	Units	Source
NO _x	9.2785	9.2785	lb/hour	Manufacturer

Emission Factors for AIRS Point 002:

Pollutant	Uncontrolled	Controlled	Units	Source
NO _x	12.210	12.210	lb/hour	Manufacturer

Emission Factors for AIRS Point 003:

Pollutant	Uncontrolled	Controlled	Units	Source
NO _x	44.730	44.730	lb/hour	Manufacturer

Emission Factors for AIRS Point 004:

Operating Time	Pollutant	Uncontrolled	Controlled	Units	Source
First 10 mins*	NO _x	44.730	44.730	lb/hour	Manufacturer
Subsequent 50 mins	NO _x	44.730	4.473	lb/hour	Manufacturer

*Emission calculations for the engines equipped with SCR controls assume zero NO_x control for the first 10 minutes of operation.

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

Applicable Requirement	Status
Operating Permit	Synthetic Minor: NO _x
NANSR	Synthetic Minor: NO _x

- 6) These engines are subject to 40 CFR Part 63, Subpart ZZZZ - **National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines** (Federally enforceable only). A copy of the complete subpart is available at the [Code of Federal Regulations website](#). All initial notifications, compliance demonstrations, and required documentation should be submitted directly to U.S. EPA Region 8, and copies sent to the Colorado Air Pollution Control Division.
- 7) Full text of the Title 40, Protection of Environment Electronic Code of Federal Regulations can be found at the [Code of Federal Regulations Website](#).

Part 60: Standards of Performance for New Stationary Sources

Regulation Type	CFR Citation	Subpart Name
NSPS	60.4200-60.4219	Subpart IIII

Part 63: National Emission Standards for Hazardous Air Pollutants for Source Categories

Regulation Type	CFR Citation	Subpart Name
MACT	63.6580-63.6595	Subpart ZZZZ

- 8) Manufacturer's certification of compliance with the New Source Performance Standards Subpart IIII was submitted with the original application for this permit.
- 9) The permit holder is required to pay fees for the processing time for this permit. An invoice for these fees will be issued after the permit is issued. Failure to pay the invoice will result in revocation of this permit. The permit holder must pay the invoice within thirty (30) days of receipt of the invoice. (Reference: Regulation Number 3, Part A, Section VI.B.)
- 10) Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the provisions of Section 25-7-114.5(7)(a), C.R.S.
- 11) Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof must constitute a rejection of the entire permit and upon such occurrence, this permit must be deemed denied ab initio. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action. (Reference: Regulation Number 3, Part B, Section III.F.)
- 12) Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollutant Emission Notice (APEN) must pay an annual emission fee. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.

- 13) Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.

ATTACHMENT A:

ALTERNATIVE OPERATING SCENARIOS

STATIONARY (CI) ENGINE

October 1, 2011

The current AOS requirements have been included as per below. AOS requirements can change based on new/modified regulations or changes to the facility status. The permittee must comply with the appropriate AOS requirements contained in the most recently issued version of PS-Memo 11-04, available on the Division's website, which may be different than the requirements below.

1. Alternative Operating Scenarios

The following Alternative Operating Scenario (AOS) for the temporary and permanent replacement of Stationary (CI) engines has been reviewed in accordance with the requirements of Regulation Number 3, Part A, IV.A, Operational Flexibility - Alternative Operating Scenarios, Regulation Number 3, Part B, Construction Permits, and Regulation Number 3, Part D, Major Stationary Source New Source Review and Prevention of Significant Deterioration, and it has been found to meet all applicable substantive and procedural requirements. This permit incorporates and must be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the owner or operator must be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

1.1. Engine Replacement

The following AOS is incorporated into this permit in order to deal with an engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of either a temporary or permanent replacement engine. "Temporary" is defined as in the same service for ninety (90) operating days or less in any 12-month period. "Permanent" is defined as in the same service for more than 90 operating days in any 12-month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day must count as a single day towards the 90-day total. The compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping).

The results of all tests and the associated calculations required by this AOS must be submitted to the Division within sixty (60) days. Results of all tests must be kept on site for five (5) years and made available to the Division upon request.

The owner or operator must maintain a log on-site and contemporaneously record the start and stop date of any engine replacement, the manufacturer, date of manufacture, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.

- 1.1.1. The owner or operator may **temporarily** replace an existing engine that is covered by this permit with a different engine without modifying this permit, so long as the temporary replacement engine complies with all permit limitations and other requirements applicable to the existing engine. Calculation of emissions from the temporary replacement engine must be made as set forth in section 1.1.3.
- 1.1.2. An Air Pollutant Emissions Notice (APEN) that includes the specific manufacturer, model and serial number and horsepower of the permanent replacement engine must be filed with the Division for the permanent replacement engine within fourteen (14) calendar days of commencing operation of the replacement engine. The APEN must be accompanied by the appropriate APEN filing fee, a cover letter explaining that the owner or operator is exercising an alternative operating scenario and is installing a permanent replacement engine and an analysis of any new applicable requirements for the replacement engine as required by Condition 1.2. This submittal must be accompanied by a certification from the Responsible Official indicating that “based on the information and belief formed after reasonable inquiry, the statements and information included in the submittal are true, accurate and complete”.

This AOS cannot be used for permanent engine replacement of a grandfathered or permit exempt engine or an engine that is not subject to emission limits.

The owner or operator must agree to pay fees based on the normal permit processing rate for review of information submitted to the Division in regard to any permanent engine replacement.

- 1.1.3. Compliance of the replacement engine with the applicable emission limitations of the original engine must be monitored by one of the following methods:
 - 1) Manufacturer certified emission factors showing compliance.
 - 2) Stack tests of same make and model showing compliance. This would only be considered if the test was done under similar conditions to Colorado (i.e. at altitude).
 - 3) Stack tests on the engine.



1.2. Applicable Regulations for Permanent Engine Replacements

1.2.1. NSPS for stationary compression ignition internal combustion engines: 40 CFR Part 60, Subpart IIII.

A permanent replacement engine that is ordered after July 11, 2005 and manufactured after April 1, 2006 or is modified or reconstructed after July 11, 2005 is subject to the requirements of 40 CFR Part 60, Subpart IIII. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement must be included in any request for a permanent engine replacement.

Note that under the provisions of Regulation Number 6, Part B, I.B. that Relocation of a source from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of Regulation Number 6 (i.e., the date that the source is first relocated to Colorado becomes equivalent to the date of manufacture for purposes of determining the applicability of NSPS IIII requirements).

1.2.2. MACT for Stationary Reciprocating Internal Combustion Engines: 40 CFR Part 63, Subpart ZZZZ.

Any permanent replacement engine located at either an area or major source of hazardous air pollutants is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement must be included in any request for a permanent engine replacement.

1.3. Additional Sources

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not “routine replacement” of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOS-approved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.

ATTACHMENT B

Equipment Description

AIRS Point	Building	Facility Equipment ID	Make	Model	Serial Number	Design Rating	NSPS Subpart III Tier	Emission Control(s)
001	DEN01	GEN01000	MTU	12V1600 DS550	369667-1-1-0214	822 hp	Tier 2	(none)
001	DEN01	GEN02000	MTU	12V1600 DS550	369667-1-2-0214	822 hp	Tier 2	(none)
001	DEN01	GEN03000	MTU	12V1600 DS550	95010600092	822 hp	Tier 2	(none)
001	DEN01	GEN04000	MTU	12V1600 DS550	9501060009	822 hp	Tier 2	(none)
001	DEN01	GENBA100	MTU	12V1600 DS550	95010500435	822 hp	Tier 2	(none)
001	DEN01	GENBA200	MTU	12V1600 DS550	95010500441	822 hp	Tier 2	(none)
001	DEN01	GENBA300	MTU	12V1600 DS550	95010500436	822 hp	Tier 2	(none)
001	DEN01	GENBA400	MTU	12V1600 DS550	95010501152	822 hp	Tier 2	(none)
002	DEN02	GEN0Y100	CAT	C18	TBD	900 hp	Tier 2	(none)
003	DEN02	GENAA100	CAT	3516C	TBD	3,147 hp	Tier 2	(none)
003	DEN02	GENAB100	CAT	3516C	TBD	3,147 hp	Tier 2	(none)
003	DEN02	GENAZ100	CAT	3516C	TBD	3,147 hp	Tier 2	(none)

ATTACHMENT B (CONTINUED)

Equipment Description

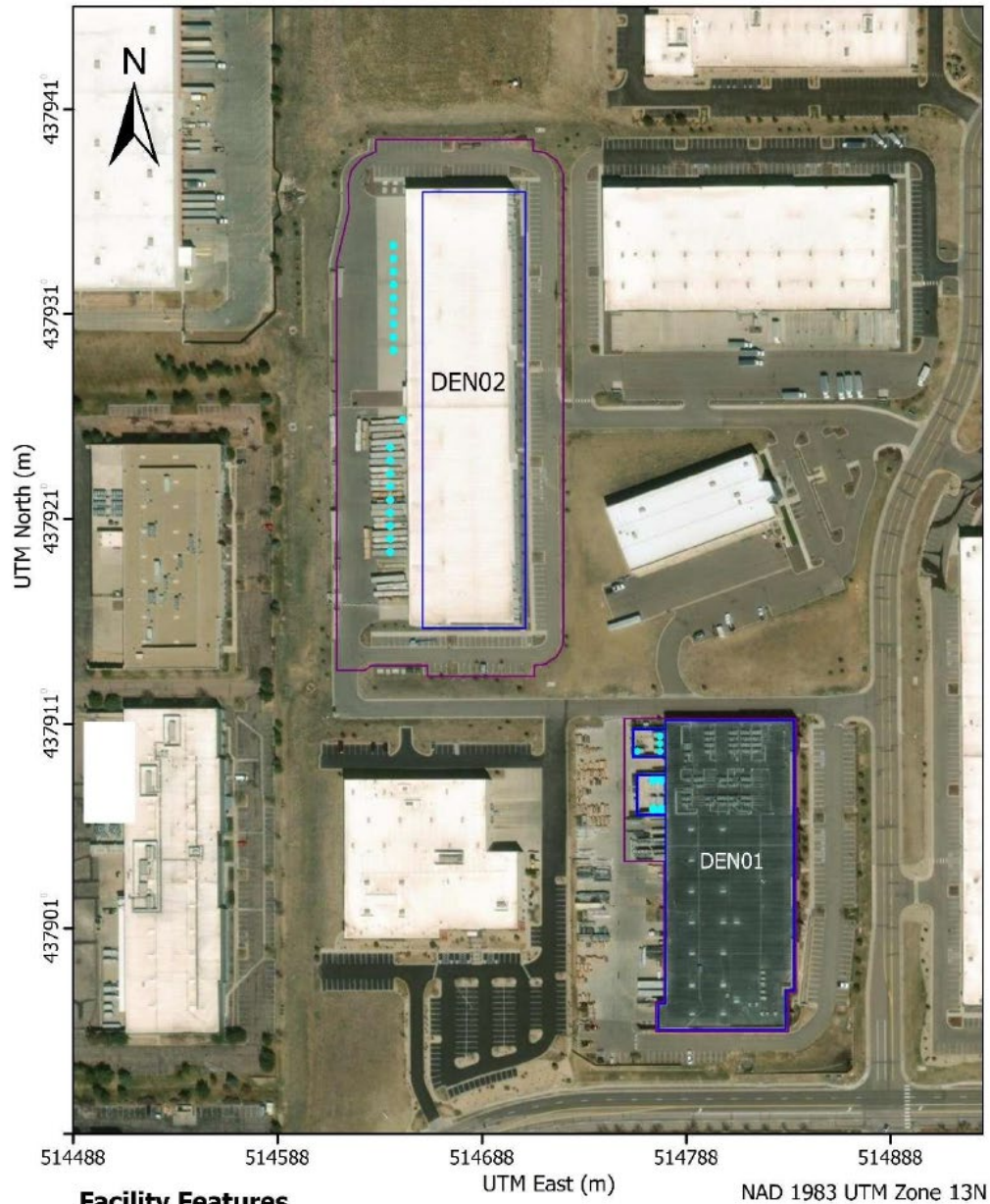
AIRS Point	Building	Facility Equipment ID	Make	Model	Serial Number	Design Rating	NSPS Subpart III Tier	Emission Control(s)
004	DEN02	GENAC100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENAD100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENAE100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENAF100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENAG100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENAH100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBA100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBB100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBC100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBD100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBE100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBF100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBG100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBH100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR
004	DEN02	GENBZ100	CAT	3516C	TBD	3,147 hp	Tier 2*	SCR

*prior to controls



ATTACHMENT C

Site Diagram and Ambient Air Boundary



Facility Features

- Generators
- Buildings
- Fence Line

