



Operating and Maintenance Plan Template for Fugitive Component Leak Emission Sources

Ver. September 10, 2008

The Air Pollution Control Division (Division) developed this Operating and Maintenance Plan (O&M Plan) for fugitive component leak emission sources that are permitted at synthetic minor facilities in the State of Colorado and do not have any applicable NSPS or MACT requirements. If the facility has NSPS or MACT requirements, e.g. NSPS KKK, then the source shall follow the federal requirements and a separate O&M Plan need not be submitted. If required, the O&M Plan shall be submitted with the permit application. If the O&M Plan template is completed correctly, the Division will approve the O&M Plan and a construction permit will be issued with the requirement to follow the O&M Plan as submitted. If the template is not completed correctly, the Division will work with the facility to make corrections. Once a construction permit is issued, the facility operator must comply with the requirements of the O&M Plan upon commencement of operation. Operators are not required to use this template. Independent case specific O&M Plans may be developed and submitted for approval with the permit application. However, the Division encourages the use of this template to expedite the permit application approval process.

Submittal Date: _____

Section 1 - Source Identification

For new permits some of this information (i.e. Facility AIRS ID, Facility Equipment ID, Permit Number, and AIRS Point ID) may not be known at the time of application. Please only fill out those fields that are known and leave the others blank.

Company Name: _____ Facility Location: _____
 Facility Name: _____ Facility AIRS ID (for existing facilities) _____

Units Covered by this O&M form

Facility Equipment ID						
Permit Number						
AIRS Point ID						

Section 2 - Maintenance Schedules

Check one of the following:

- Facility shall follow manufacturer recommendations for the operation and maintenance of equipment and control devices. These schedules and practices, as well as any maintenance records showing compliance with these recommendations, shall be made available to the Division upon request.
- Facility shall follow individually developed maintenance practices and schedules for the operation and maintenance of equipment and control devices. These schedules and practices, as well as any maintenance records showing compliance with these recommendations, shall be made available to the division upon request and should be consistent with good air pollution control practices for minimizing emissions as defined in the New Source Performance Standard (NSPS) general conditions.

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Air Pollution Control Division

Section 3 - Monthly Emission Modeling or Calculations

The following box must be checked for O&M plan to be considered complete.

- The source will calculate emissions based on the methods and emission factors provided in the permit application and approved by the division, as reflected in the construction permit. *Please see the operation and maintenance plan guidance document for further details and examples of emission calculations.*

Section 4 – General Monitoring Requirements

General Leak Detection Program - all sources must conduct a recorded walk-through by plant or company personnel with visual, auditory and olfactory leak detection according to the schedule in Table 1. The operator must make a reasonable attempt to fix any leaks found during these inspections. Check which box applies based on facility-wide permitted VOC emissions.

Table 1	
Permitted Facility VOC Emissions	Inspection Frequency
<input type="checkbox"/> ≥ 80 tpy	Monthly
<input type="checkbox"/> < 80 tpy	Quarterly

Section 5 - Emission Control Monitoring Requirements

- Non-KKK LDAR Program Using Method 21 – (If federally enforceable emission reductions are being requested)
- Attach an explanation of the monitoring program and recordkeeping format
 - The master component list and monitoring records shall be made available to the division upon request
 - Maintain a log of equipment and component additions and deletions

Section 6 – Recordkeeping Requirements

The following box must be checked for O&M plan to be considered complete.

- Synthetic minor sources are required to maintain maintenance and monitoring records for the requirements listed in sections 2, 3, 4 and 5 for a period of 2 years. If an applicable Federal NSPS, NESHAP or MACT requires a longer record retention period the operator must comply with the longest record retention requirement.

Section 7 - Additional Notes and O&M Activities

Please use this section to describe any additional notes or operation and maintenance activities.
