



Guidance Document (Form Series 400)

Oil and Gas Industry Construction Permit Self-Certification Form Completion

In June 2008 the Air Pollution Control Division (APCD) participated in a lean management process improvement activity known as a Kaizen event. The focus of the Kaizen event was to eliminate waste, reduce delays and improve the air pollution permitting process for oil and gas industry minor emissions sources. As a result of the Kaizen event, the APCD modified the oil and gas industry permitting process.

One of the modifications altered the process by which owners or operators obtain final authority to operate the emissions source. Previously, the APCD issued operators an Initial Approval permit and upon subsequent self-certification, reissued the permit as Final Approval. Both of these permit issuances required engineering staff time. Under the new process, the APCD will issue the operator a permit titled a Construction permit. The permit document will not contain the Initial or Final approval designation and will only need to be issued once. The Construction permit will contain requirements to self-certify compliance similar to former Initial Approval permits. However, once the operator completes the self-certification, the APCD will not reissue the permit. Rather, APCD Final Approval coordination staff will issue the operator a Final Authorization to Operate letter for the Construction permit. This process will eliminate the need for engineering staff to spend time reissuing Final Approval permits and create more time for Initial Approval type permitting activity.

To facilitate the self-certification process, Construction permits issued under the new permit process will contain permit specific "Construction Permit Self-Certification Forms" for the operator to review, fill out and return to the APCD. The intent of this new approach is to clearly communicate to the operator what supporting documentation must be submitted to the APCD along with the self-certification form. Typical supporting documentation may include: compliance test results, opacity readings and initial notifications for sources subject to Federal MACT or NSPS.

The remainder of this guidance document is intended to explain in greater detail the process to self-certify compliance with construction permit terms and conditions in order to obtain a "Final Authority to Operate" the covered emissions source.

The permit specific self-certification form issued with your Construction permit must be completed in its entirety and submitted to the Division within 180 days of start-up of a process or piece of equipment. If your Construction permit was not issued with a specific self-certification form, the Generic Self-Certification form (Form APCD – 400) may be used. If form APCD-400 is used, you may wish to contact the APCD to obtain guidance on what supplemental information is needed to ensure a complete self-certification package for your specific construction permit.

If all equipment covered by your permit will start at the same time, a single self-certification form may be filed. However, if not all equipment will have the same start-up date, as in the case of a facility-wide permit with phased construction, a self-certification must be filed for each emissions point within 180 days of its commencing operation. In this case, the operator must submit a Self-Certification Timeline

Table (Form APCD-401) each time certification of an additional emissions point occurs. Form APCD-401 is intended to help the APCD and operator track the progress of self-certifications for phased plant construction. If multiple emissions points commence operation at the same time, they may be certified together on a single self-certification form. Please use the following procedure:

1. On the Self-Certification form, list the source AIRS IDs for each emissions point for which the self-certification is applicable. Then, complete the rest of the form, referring only to the AIRS ID points you have listed. For instance, if stack testing is required only for equipment that has not yet started, you may skip the stack testing section of the form. Be sure to complete all sections of the form that apply to the equipment that has started operating.
2. Complete Form APCD-401, the Self-Certification Timeline Table. List the AIRS ID for each emissions point certified to and fill in the data fields for each column in the corresponding row. If compliance testing is not required for the emissions point, write "NA" in the column. Submit Form APCD-401 along with the self-certification form.

Once self-certification forms are received for a portion of the emissions points covered by a permit, the APCD will create a file of this information. A "Final Authorization to Operate" letter will not be issued to the operator until such time that all equipment is installed and self-certification completed. Follow the procedure above for each subsequent emissions point start-up in order to meet the 180-day deadline to self-certify compliance with associated permit conditions. Once all emissions points covered by a permit have been certified, the APCD will issue a "Final Authorization to Operate" letter for the construction permit. Please note, the construction permit requires the operator to commencement construction of the emissions sources within 18 months of issuance date of the permit or the construction commencement date proposed in the permit application. For facility wide permits, with phased construction, the 18-month limitation applies to each emissions point. If a particular emissions point will not commence construction within the 18-month window of time, the operator may request a one-time extension of this deadline. If the 18-month construction window expires prior to commencement of construction, the authority to construct the associated emissions point expires as well.

Please note, a permit specific self-certification form was mailed to you with your Construction permit. *This is the version that should be returned to the Division.* If you need an additional copy, please contact the Division at the number below. You may also download a general self-certification form (Form APCD-400) on the APCD website at www.state.co.us/ap/oilgaspermitting.html. If you use the general self-certification form, you may wish to contact the Division for guidance on supporting documents that will be required.

If you have any questions about how to complete the self-certification process, please contact the Division at 303-692-3150.