

**BEFORE THE ADMINISTRATOR
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

IN THE MATTER OF)	
)	
Clean Air Act Title V Operating Permit)	
Renewal)	
)	
Issued to Young Gas Storage Company, Ltd.)	Title V Permit No. 96OPMR177
for the Young Compressor Station)	
)	
Issued by the Colorado Department of Public)	
Health and Environment, Air Pollution)	
Control Division)	

**PETITION TO OBJECT TO CLEAN AIR ACT TITLE V OPERATING PERMIT
RENEWAL FOR YOUNG GAS STORAGE COMPANY, LTD.’S
YOUNG COMPRESSOR STATION**

Pursuant to Section 505(b)(2) of the Clean Air Act, 42 U.S.C. § 7661d(b)(2), and 40 C.F.R. § 70.8(d), the Center for Biological Diversity (“Center” or “Petitioner”) petitions the Administrator of the United States Environmental Protection Agency (“Administrator” or “EPA”) to object to the renewed Title V Operating Permit (“Title V Permit”), Permit Number 96OPMR177, issued by the Colorado Department of Public Health and Environment’s Air Pollution Control Division (“Division”) authorizing Young Gas Storage Company, Ltd. (“Young Gas Storage”) to operate the Young Compressor Station in Morgan County, Colorado.¹

The Center for Biological Diversity petitions the Administrator to object because the Division improperly exempted gas venting from the Title V Permit.

THE YOUNG COMPRESSOR STATION

The Young Compressor Station is a gas storage facility transmission and storage facility that consists of three large reciprocating internal combustion compressor engines, a triethylene glycol dehydrator, and a facility flare. Young Gas Storage uses the engines to compress gas for injection into underground storage reservoirs or for withdrawal and delivery to pipelines. The triethylene glycol dehydrator removes liquids that accumulate in stored gas. The liquids are stored in on-site tanks and hauled away by trucks. The facility flare burns hydrocarbon emissions from the dehydrator. The facility also vents emissions during various operations and

¹ Young Gas Storage, Ltd. is a joint venture owned by Kinder Morgan Inc., Xcel Energy, and Colorado Springs Utilities.

activities and leaks pollution on a regular basis from pipes, connectors, valves, and other components (called fugitive emissions).

The facility is a major source of air pollution. The facility releases large amounts of nitrogen oxides (“NO_x”) and carbon monoxide (“CO”), which are byproducts of combustion, as well as large amounts of volatile organic compounds (“VOCs”), which are a byproduct of gas handling and processing. The facility also releases large amounts of hazardous air pollutants (“HAPs”), including benzene, a known carcinogen, and toluene, ethylbenzene, and xylene.

PETITIONER

The Center for Biological Diversity is a nonprofit, 501(c)(3) conservation organization. The Center’s mission is to ensure the preservation, protection, and restoration of biodiversity, native species, ecosystems, public lands and waters, and public health through science, policy, and environmental law. Based on the understanding that the health and vigor of human societies and the integrity and wildness of the natural environment are closely linked, the Center is working to secure a future for animals and plants hovering on the brink of extinction, for the ecosystems they need to survive, and for a healthy, livable future for all of us.

PROCEDURAL BACKGROUND

The Division provided notice and a 30-day opportunity for public comment on the draft Title V Permit renewal and associated draft Technical Review Document (“TRD”) for the Young Compressor Station in May 2024. The Center submitted timely and significant comments on the draft Title V Permit renewal on June 8, 2024. *See* Exhibit 1, Center for Biological Diversity Comments on Draft Title V Permit Renewal for Young Compressor Station (June 8, 2024). The Division responded to the Center’s timely and significant comments on August 1, 2024. *See* Exhibit 2, Colorado Air Pollution Control Division, “Young Compressor Station, Response to Comments on Draft Renewal Operating Permit” (Aug. 1, 2024).

The Division subsequently forwarded the proposed Title V Permit Renewal to EPA for its 45-day review period. The EPA did not object to the issuance of the proposed Title V Permit renewal. The Division issued the final Title V Permit and final TRD on September 17, 2024. *See* Exhibit 3, Final Title V Permit (Sept. 17, 2024), and Exhibit 4, Final TRD (Sept. 17, 2024).

Pursuant to 42 U.S.C. § 7661d(b)(2), this petition is now timely submitted within 60 days following a lack of objection from the EPA during the agency’s 45-day review period.

GENERAL TITLE V PERMITTING REQUIREMENTS

The Clean Air Act prohibits qualifying stationary sources of air pollution from operating without or in violation of a valid Title V permit, which must include conditions sufficient to “assure compliance” with all applicable Clean Air Act requirements. 42 U.S.C. §§ 7661c(a), (c);

40 C.F.R. §§ 70.6(a)(1), (c)(1). “Applicable requirements” include all standards, emissions limits, and requirements of the Clean Air Act, including all requirements in an applicable implementation plan. 40 C.F.R. § 70.2. Congress intended for Title V to “substantially strengthen enforcement of the Clean Air Act” by “clarify[ing] and mak[ing] more readily enforceable a source’s pollution control requirements.” S. Rep. No. 101-228, at 347, 348 (1990), *as reprinted in* A Legislative History of the Clean Air Act Amendments of 1990, at 8687, 8688 (1993). As EPA explained when promulgating its Title V regulations, a permit should “enable the source, States, EPA, and the public to understand better the requirements to which the source is subject, and whether the source is meeting those requirements.” Operating Permit Program, Final Rule, 57 Fed. Reg. 32,250, 32,251 (July 21, 1992). Among other things, a Title V permit must include compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit. 42 U.S.C. § 7661c(c); 40 C.F.R. §§ 70.6(a)(1), (c)(1).

Under the Clean Air Act, “any person” may petition EPA to object to a proposed permit “within 60 days after the expiration of [EPA’s] 45-day review period.” 42 U.S.C. § 7661d(b)(2); *see also* 40 C.F.R. § 70.8. Each objection in the petition must have been “raised with reasonable specificity during the public comment period provided for in § 70.7(h) of this part, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.” 40 C.F.R. § 70.8(d). Any objection included in the petition “must be based on a claim that the permit, permit record, or permit process is not in compliance with applicable requirements or requirements [of 40 C.F.R. Part 70].” 40 C.F.R. § 70.12(a)(2).

Upon receipt of a petition, EPA “*shall* issue an objection within [60 days] if the petitioner demonstrates to the Administrator that the permit is not in compliance with the requirements of this chapter, including the requirements of the applicable implementation plan.” 42 U.S.C. § 7661d(b)(2) (emphasis added); *see also* 40 C.F.R. § 70.8(c) (“The Administrator will object to the issuance of any proposed permit determined by the Administrator not to be in compliance with applicable requirements or requirements under this part.”).

GROUNDINGS FOR OBJECTION

For the reasons set forth below, the Administrator must object to the issuance of the Title V Permit for the Yong Compressor Station.

I. The Division Improperly Exempted Gas Venting Emissions as an “Insignificant Activity”

In issuing the Title V Permit, the Division included “Routine or predictable gas venting emissions” in the “List of Insignificant Activities” set forth in Appendix A, effectively exempting these emissions from any oversight under the Title V Permit. Exhibit 3, Title V Permit at 72. The exemption of “Routine or predictable gas venting emissions” as an insignificant activity, however, is contrary to requirements under 40 C.F.R. § 70, as well as Colorado’s Title V permitting program approved by the EPA pursuant to 40 C.F.R. § 70.

Under Title V regulations, the EPA “may approve as part of a State program a list of insignificant activities and emission levels which need not be included in permit applications.” 40 C.F.R. § 70.5(c). To this end, the Division has promulgated a list of “insignificant activities” that have been approved by the EPA as part of Colorado’s Title V permitting program. This list, set forth at Air Quality Control Commission (“AQCC”) Regulation No. 3, Part C, Section II.E.3, includes, among other activities, “individual emission points in attainment or attainment/maintenance areas having uncontrolled actual emissions of any criteria pollutant of less than two tons per year[.]” AQCC Regulation No. 3, Part C, Section II.E.3.a.

In comments on the draft Title V Permit, Petitioner specifically raised concerns over the improper inclusion of certain emissions as “insignificant activities.” Exhibit 1, Center Technical Comments at 9. Petitioner specifically flagged that for emissions resulting from “Station emergency blowdowns,” it was not possible to conclude the emissions, which would be in the form of VOCs, would qualify as “insignificant” and that inclusion of these emissions as “insignificant” would undermine compliance with applicable VOC limits in the Title V Permit. Petitioner stated:

We are concerned over the inclusion of “Station emergency blowdowns” as insignificant activities in the draft Title V permit. By definition, emergencies are unforeseeable and unpredictable. The draft Title V permit notes that “emergencies” are defined as, “any situation arising from sudden and unforeseeable events beyond the control of the source[.]” Draft Title V permit at 77. Because emergencies are not foreseeable, it is not possible to accurately or credibly calculate emissions from such events and not possible to conclude that such emissions would qualify as insignificant. Furthermore, it is questionable whether blowdowns can or should be included as a distinct source of emissions for purposes of determining insignificant activities. Blowdown emissions, emergency or not, are presumably captured by the emission limits established for the engines, dehydrator, heaters and boiler, and pressurized condensate storage tank. It is not appropriate to exempt emergency blowdown emissions from counting toward compliance with applicable emission limits.

Id. Petitioner commented, “Emergency blowdown emissions must be removed from the list of insignificant activities and the Title V permit must make clear that such emissions must be accounted for assure compliance with applicable limits.” *Id.*

In response to this comment, the Division eliminated the reference to “Station emergency blowdowns” in the list of insignificant activities, but then proceeded to list a new activity, “Routine or predictable gas venting emissions.” Exhibit 2, Response to Comments at .pdf p. 6-7. The Division asserted that, due to revisions to AQCC Regulation No. 3, it was necessary to clarify that only “routine or predictable” venting emissions should be included and that such emissions would be “below the de minimis thresholds” for insignificant activities. *Id.* at 6.

While Petitioner appreciates that the Division removed “Station emergency blowdowns” from the list of insignificant activities, the newly included “Routine or predictable gas venting emissions” activity continues to suffer from the flaws identified by Petitioner in its comments

and continues to defy requirements under Title V and Colorado's approved Title V permitting program.²

To begin with, it is simply not clear what emissions are actually exempted as routine or predictable gas venting and therefore not clear whether inclusion of these emissions on the list of "insignificant activities" complies with Title V regulations and Colorado's Title V permitting program. The Division's response to comments offers no specific definition or explanation as to what constitutes routine or predictable gas venting. Additionally, neither the Title V Permit nor the TRD set forth any definition or explanation as to what constitutes "routine or predictable gas venting" such that it is understood where emissions are released, during what times, and for what durations. Compounding this lack of clarity is that Young Gas Storage's March 28, 2023 Title V Permit renewal application does not even identify "routine or predictable gas venting" as an emission point, let alone explain what constitutes routine or predictable gas venting.³ See Exhibit 5, Young Gas Storage Company, Ltd., Title V Operating Permit Renewal Application Package, Young Compressor Station, Permit No. 96OPMR177 (March 28, 2023).

The Division's response to comments appears to imply that routine or predictable gas venting includes all emissions that are not the result of emergencies and not the result of venting for safety reasons. See Exhibit 2, Response to Comments at .pdf p. 6. However, this could conceivably include every instance of gas venting from any piece of equipment at the Young Compressor Station for any period of time for non-emergency and non-safety reasons. Confusing things further is the list of insignificant activities in Appendix A of the Title V Permit appears to include specific routine or predictable activities where gas venting occurs, including "Condensate truck loading equipment," "Various drain sumps," "Annual station emergency shutdown device (ESD) system testing," and "Semi-annual bottom hole survey natural gas venting." It is not clear how these insignificant activities are distinguished from routine or predictable gas venting.

In its response to comments, the Division also references "blowdown" events, but it is not clear whether routine or predictable gas venting is limited just to blowdown events at the Young Compressor Station. The Division cites PS Memo 20-04 in its response to comments, which explains that routine or predictable gas venting includes myriad activities, including blowdowns. See Exhibit 6, Air Pollution Control Division, "Routine or Predictable Gas Venting Emissions Calculation and Instructions on Permitting for Oil and Natural Gas Operations," PS Memo 20-04 (Nov. 6, 2020) at 4-5. As a practical matter, the lack of specificity means the Title V Permit sets forth an extremely broad exemption for emissions from routine and predictable gas venting, further calling into question whether inclusion of these emissions on the list of "insignificant activities" complies with Title V regulations and Colorado's Title V permitting program.

² Because the Division only included "Routine or predictable gas venting emissions" in the list of insignificant activities after the close of the public comment period, Petitioner's objections to the provision are reviewable by EPA pursuant to 40 C.F.R. § 70.8(d) as the grounds for objecting arose after the close of the comment period.

³ Young Gas Storage's application does not appear to explicitly identify or list insignificant activities, even though 40 C.F.R. § 70.5(c) expressly requires that a list of insignificant activities "which are exempted because of size or production rate" must be included in the application.

The lack of specificity around the meaning of routine or predictable gas venting also calls into question whether the exemption inappropriately includes emissions from pollutant emitting equipment subject to applicable limits under the Title V Permit. Here, the Title V Permit establishes applicable VOC limits for compressor engines (Section II, Condition 1), the dehydrator (Section II, Condition 2), and the pressurized condensate storage tank (Section II, Condition 4). According to PS Memo 20-04, routine or predictable venting can occur during the operation of all of these pollutant emitting activities. Exhibit 6, Air Pollution Control Division, “Routine or Predictable Gas Venting Emissions Calculation and Instructions on Permitting for Oil and Natural Gas Operations,” PS Memo 20-04 (Nov. 6, 2020) at 4-5. For example, for storage tanks, routine or predictable gas venting can include releasing emissions through a “thief hatch, blowdown valve, venting point, or other access point for any routine or predictable activity.” *Id.* at 4. Additionally, blowdowns of compressor engines and dehydrators are also identified as examples of routine or predictable venting. *Id.* at 5.

Colorado’s Title V permitting program expressly states that emissions cannot be exempted as insignificant “if by taking such an exemption, a source would avoid any specific federal or state applicable requirement[.]” AQCC Regulation No. 3, Part C, Section II.E. Here, by broadly exempting routine or predictable gas venting emissions, the Title V Permit appears to exempt emissions that are subject to the VOC limits applicable to the compressor engines, dehydrator, and pressurized condensate storage tank. In essence, the exemption allows Young Gas Storage to ignore such emissions for purposes of assessing compliance with the applicable limits. These emissions, however, cannot be exempted as insignificant.

In addition to the lack of specificity around what constitutes routine or predictable gas venting, there also appears to be no support for the Division’s assertion that such emissions are insignificant on the basis of uncontrolled actual emissions.

In response to comments, the Division claims that “Routine or predictable gas venting” emissions would fall below “de minimis thresholds” based on “worst case estimations of emissions.” Exhibit 2, Response to Comments at .pdf p. 6-7. Under Colorado’s Title V permitting program, the applicable de minimis threshold is “uncontrolled actual emissions of any criteria pollutant of less than two tons per year[.]” AQCC Regulation No. 3, Part C, Section II.E.3.a. Accordingly, the Division appears to argue that “uncontrolled actual emissions” of VOCs from routine or predictable gas venting are below two tons per year. This claim is not supported.

Under the Colorado SIP, “uncontrolled actual emissions” are defined as, “The annual emission rate corresponding to the annual process rate listed on the Air Pollutant Emissions Notice form, without consideration of any emission control equipment or procedures.” AQCC Regulation No. 3, Part A, Section I.B.46.⁴ For routine and predictable gas venting at the Young Compressor Station, there is no corresponding Air Pollutant Emissions Notice form. Thus, there is no established “process rate” by which to assess the annual emission rate. Furthermore, even if there was a “process rate” to rely upon, such rate is to be assessed without consideration of any

⁴ Current AQCC regulations set forth the definition of “uncontrolled actual emissions” at AQCC Regulation No. 3, Part A, Section I.B.55. However, this renumbering has yet to be approved by the EPA and incorporated into the SIP. Nevertheless, the definition is the same in the SIP and in current AQCC regulations.

emission control equipment or procedures. In the case of routine and predictable gas venting at the Young Compressor Station, this means the annual emission rate must be assessed without consideration of any procedures that would limit emissions, such as procedures to limit the number, duration, and volume, and therefore the mass, or weight, of venting events.

In the case of the Young Compressor Station, the Division does not appear to have assessed uncontrolled actual VOC emissions in accordance with the Colorado SIP. In response to comments, the Division explained:

In accordance with PS Memo 20-04 the source summed all routine and predictable emissions for comparison against the permitting requirements of Colorado Regulation No. 3, Part A, Section II.B.3 and Part B, Section II.D.2 and II.D.3. In doing so the source looked back at five years of data for all blowdown and emergency shutdown events that occurred at the facility including events that were planned and unplanned, those done for safety, and those that would be considered “emergencies” per the definition reference by the commenter. The result was a source with emissions below the de minimis thresholds.

Exhibit 2, Response to Comments at .pdf p. 6. This response indicates that while Young Gas Storage may have “looked back at five years of data” and “summed all routine and predictable gas emissions,” it does not appear as if emissions were assessed according to the definition of uncontrolled actual emissions. Simply summing estimated emissions is not the same as assessing emissions based on “annual process rates” and “without consideration of any emission control equipment or procedures.”

Here, it is concerning that there seems to be no “annual process rates” related to routine or predictable gas venting. Neither the Title V Permit nor the TRD contain any information related to such annual process rates and Young Gas Storage’s application contains no information related to routine or predictable gas venting. There appears to be no federally enforceable limit on the number, duration, and volume, and therefore the mass (and weight), of venting events that would form a basis for any “annual process rate.” This means the “annual process rate” is completely at the discretion of Young Gas Storage, meaning any process rate is subject to change at any time, even if the resulting emissions could exceed de minimis thresholds.

It is further concerning that the Division’s assessment of routine or predictable gas venting emissions was not undertaken “without consideration of emission control equipment or procedures.” The assessment presented by the Division appears to have accounted for Young Gas Storage following procedures to manage routine or predictable gas venting such that it claimed VOC emissions would be below de minimis thresholds. Indeed, to reliably estimate venting emissions, it seems necessary for Young Gas Storage to have assumed adherence to certain limits on the number, duration, and volume of venting events, as opposed to assuming frequent routine and predictable venting of large volumes of gas over long periods of time. However, such procedures to limit routine or predictable gas venting VOC emissions are not to be considered when assessing uncontrolled actual emissions and the applicability of any exemptions under Colorado’s Title V permitting program.

This gets to the heart of the matter, which is that the Division and Young Gas Storage appear to have just assumed routine or predictable gas venting VOC emissions will be limited by adherence to undefined process rates and procedures that limit the number, duration, and volume, and therefore the mass, of venting. However, the Colorado SIP clearly states that uncontrolled actual emissions are based on discrete annual process rates that do not consider controls or procedures to limit emissions. The reliance on undefined process rates and procedures to assume routine or predictable gas venting emissions would be limited to below de minimis thresholds for insignificant activities is therefore contrary to Colorado's Title V permitting program, applicable requirements, and Title V regulations under the Clean Air Act.

In response to comments, the Division asserts that it relied upon "worst case estimations of emissions" related to routine or predictable gas venting. Exhibit 2, Response to Comments at .pdf p. 7. However, the "worst case" estimation of routine or predictable gas VOC venting emissions would be that Young Gas Storage vents virtually 100% of all gases for an entire year.

This is due to the fact that, aside from VOC limits for the dehydrator and pressurized condensate storage tank, there are no physical or operational constraints on gas venting. Rather, the release of gas during venting is based entirely on whether Young Gas Storage chooses to vent or not to vent. Under the Colorado SIP, a facility's potential to emit pollutants is based on "[t]he maximum capacity of a stationary source to emit a pollutant under its physical and operational design." AQCC Regulation No. 3, Part A, Section I.B.37. To the extent that limitations on potential to emit are imposed, such limits must be "state enforceable and federally enforceable." *Id.*

Since the Title V Permit imposes no state and federally enforceable limitations on the potential to emit during routine or predictable gas venting, there is no practical limit, meaning there are no actual limits on routine or predictable gas venting. Although there are VOC limits for the dehydrator and pressurized condensate storage tank, there are otherwise no limits on gas venting from the engines and other equipment at the Young Compressor Station.

Neither the Title V Permit, the TRD, nor Young Gas Storage's application provide any information regarding VOC emissions released during routine or predictable gas venting, so it is not possible to completely and accurately calculate a legitimate worst-case estimation of routine or predictable gas venting emissions. However, past permitting documents for the Young Compressor Station and other relevant sources provide insightful information regarding potential VOC emissions.

Construction Permit Number 94MR130-6, which authorized fugitive emissions at the Young Compressor Station, includes a 1998 gas composition analysis that indicates VOCs, including propane, hexane, benzene, toluene, ethylbenzene, and xylene, comprise a bit more than 6% of total gas emissions (~6.5% by weight). See Exhibit 7, Construction Permit Number 94MR130-6, Initial Approval (Nov. 20. 1998) at .pdf p. 10. The analysis also indicates the total molecular weight of emitted gas would be 18.08 lbs/lb-mol. Division's PS 20-04 Memo contains direction for calculating venting emissions, indicating that mass emissions are based on the volume of emitted gas, the molecular weight of emitted gas, the mass fraction of pollutant in the gas, and the molar volume of the ideal gas. See Exhibit 6, Air Pollution Control Division,

“Routine or Predictable Gas Venting Emissions Calculation and Instructions on Permitting for Oil and Natural Gas Operations,” PS Memo 20-04 (Nov. 6, 2020) at 12. The calculation is presented in PS 20-04 as follows:

$$E_x = Q \times MW \times X_x \times \frac{1}{C} \quad (10.4-3)$$

where:

E_x	=	Emissions of pollutant x (lb)
Q	=	Volume of emitted gas (scf)
MW	=	Molecular weight of emitted gas (lb/lbmol)
	=	Specific gravity of emitted gas × molecular weight of air
X_x	=	Mass fraction of pollutant x in gas (lb x/lb gas)
C	=	Molar volume of ideal gas, 379 scf/lb-mol at 60 degrees Fahrenheit and 1 atmosphere

Id. Using this equation and relevant information, one can develop estimates of potential emissions from venting at the Young Compressor Station.

Here, a worst-case scenario could be that the three compressor engines vent continuously for an entire year. Each engine has a throughput limit of 147.04 MMscf/year for a potential total of 441.12 MMscf to be vented. Although this would be an extraordinarily large amount of vented gas, again, there are no limits on gas venting from the engines.⁵ Using the aforementioned equation and the information from the 1998 gas analysis, one can identify the appropriate variables and then calculate potential emissions. In this case Q would equal 441,120,000 scf of gas vented, MW would equal 18.08, X_x would conservatively be 6%, and C would be 379. The equation can be calculated as follows:

$$441,120,000 \text{ scf} * 18.08 * .06 * 1/379 = 1,262,604.16 \text{ lbs/year}$$

$$1,262,604.16 \text{ lbs}/2000 = 631.30 \text{ tons of VOCs per year.}$$

Again, while this worst-case scenario VOC emission estimate is extremely high, there are no limits on routine or predictable gas venting that would prevent these potential emissions. Indeed, even if just 1% of the 441,120,000 scf total gas throughput limit for the engines is vented (4,411,200 scf), total VOC emissions could be more than six tons per year, well above de minimis thresholds for insignificant activities. Taking into account potential routine or predictable gas venting from other units, including the dehydrator, tanks, etc., it is clear that a legitimate worst-case estimate of VOC emissions from routine or predictable gas venting is very likely above de minimis thresholds.

⁵ Although there are limits on combustion exhaust emissions when the engines are operating, there are no limits on non-combustion related emissions, such as routine or predictable gas venting, from the engines. As the Title V Permit indicates, compliance with the VOC limit is based upon the amount of fuel combusted in the engines. See Title V Permit at 14, Section II, Condition 1.2.

While the Division may take issue with Petitioner’s approach to estimating worst-case emissions, the solution is to establish federally enforceable limits on routine or predictable gas venting emissions such that the Young Compressor Station’s potential to emit is legitimately constrained. Indeed, the Division has done this already in relation to other similar sources operating in Colorado. For example, in a recently issued Title V Permit authorizing Bargath, LLC to operate the Sharrard Park Compressor Station, the Division included a specific condition establishing limits on routine or predictable gas venting. *See* Exhibit 8, Air Pollution Control Division Colorado Operating Permit, Sharrard Park Compressor Station, Renewed Title V Permit No. 12OPGA364 (Nov. 1, 2023) at 50, Section II, Condition 3. The Condition established specific limits for a number of activities, including inlet piping blowdowns, compressor blowdowns, compressor purge, engine start-ups, and load out events. *Id.* at 51, Section II, Condition 3.1.

Regardless, although Petitioner’s math may need refining, it is nevertheless more than what has been provided or referenced by the Division to justify exempting routine and predictable gas venting emissions as insignificant under the Title V Permit. As it stands, there is no support for the claim that the Division conducted a proper assessment of worst-case emissions from routine or predictable gas venting and no support for the assertion that emissions are below de minimis thresholds and appropriately exempted.

CONCLUSION

Pursuant to 42 U.S.C. § 7611d(b)(2) and 40 C.F.R. § 70.8(d), the EPA must object to the issuance of the Title V Permit for the Young Compressor Station in Morgan County, Colorado. As this Petition demonstrates, the inclusion of routine or predictable gas venting emissions in the Title V Permit’s list of insignificant activities is contrary to Colorado’s Title V permitting program, Title V regulations, and applicable requirements under the Colorado SIP. Accordingly, the Administrator must object to the issuance of the Title V Permit.

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Respectfully submitted,



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cc (per 40 C.F.R. § 70.8(d)):

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TABLE OF EXHIBITS

1. Center for Biological Diversity Comments on Draft Title V Permit Renewal for Young Compressor Station (June 8, 2024).
2. Colorado Air Pollution Control Division, “Young Compressor Station, Response to Comments on Draft Renewal Operating Permit” (Aug. 1, 2024).
3. Final Title V Permit, Young Compressor Station (Sept. 17, 2024).
4. Final TRD, Young Compressor Station (Sept. 17, 2024).
5. Young Gas Storage Company, Ltd., Title V Operating Permit Renewal Application Package, Young Compressor Station, Permit No. 96OPMR177 (March 28, 2023).
6. Air Pollution Control Division, “Routine or Predictable Gas Venting Emissions Calculation and Instructions on Permitting for Oil and Natural Gas Operations,” PS Memo 20-04 (Nov. 6, 2020).
7. Construction Permit Number 94MR130-6, Initial Approval (Nov. 20. 1998).
8. Air Pollution Control Division Colorado Operating Permit, Sharrard Park Compressor Station, Renewed Title V Permit No. 12OPGA364 (Nov. 1, 2023).