

APCD O&G Permitting Updates

Brad Eades, O&G Permitting Section,
Air Pollution Control Division

RMEHSPG Q3 Meeting July 17, 2025



COLORADO
Department of Public
Health & Environment

Agenda

- Our Team
- Oil and Gas General Permit (GP) Updates
 - Upcoming changes to existing GPs
 - Development of new GP12
- Resources to help with Permitting Efficiency

Our Team

- Section Manager
 - Brad Eades
- Unit Supervisors
 - Stephanie Spector
 - Jon Lefor
 - Harrison Slaughter
- 17 Engineers/Permit Writers
 - Work Lead: Morgan Miller (Wickey)
 - GP12 Project Manager: Diego Chimendes

O&G General Permit (GP) Updates

What is a General Permit?

- Highly utilized, standardized permit with minimal lead time to construct
- Steps to register

What's New

- Revisions to General Permits
 - GP01, GP02, GP05, GP06, GP07, GP08, GP09, GP10, GP11
- New Facility-Wide GP for Well Production Facilities coming soon...
 - GP12



COLORADO
Department of Public
Health & Environment

O&G General Permit (GP) Updates

General Scope of Revisions to General Permits GP01-GP11

- Address recent reclassification of ozone nonattainment areas
- Address Regulation 7 & Regulation 26 updates
- Updates to monitoring, recordkeeping and reporting
- Additional measures to ensure compliance with National Ambient Air Quality Standards (NAAQS)
- Clarification to the application and approval process for GPs

O&G General Permit (GP) Updates

Revisions to General Permits GP01-GP11 Impacting All Registered Sources

- Restrict changes that can happen without additional approval (i.e. Alternative Operating Scenario or AOS)
- Address ozone nonattainment reclassifications
 - VOC limits in GP01, GP05, GP07 are now based on ozone classification
 - Attainment/Moderate/Marginal: 39 tpy (GP01), 10 tpy (GP05 & 07)
 - Serious or Severe: 10 tpy (GP01), 3 tpy (GP05 & 07)
 - “Grandfather” sources that became major solely due to reclassification
- Regulation 7 updates

O&G General Permit (GP) Updates

Revisions to General Permits GP01-GP11 Impacting All Registered Sources (continued)

- SO_x, PM_{2.5}, and PM₁₀ must be < 2 tpy
- Tracking of insignificant activities (i.e. activities that are exempt from permitting)
- GP02 to include permanent like-kind NG-engine replacement
- Weekly ECD monitoring in GP01, GP05, GP07, and GP08 (i.e. pilot light and visible emissions checks)
- Sampling every 5 years in GP01, GP05, and GP08

O&G General Permit (GP) Updates

Revisions to General Permits GP01-GP11 Impacting only New/Modified Registered Sources

- Prohibition on dual product tanks in GP01, GP05, GP08
- Emission limits for NO_x and CO emitted from control equipment
- Up to **daily** ECD monitoring in GP01, GP05, GP07, and GP08 (i.e. pilot light and visible emissions checks)
 - Dependent on facility-wide emissions
- Up to **annual** sampling in GP01, GP05, and GP08



COLORADO
Department of Public
Health & Environment

O&G General Permit (GP) Updates

- FAQ will be published concurrently with or shortly after GP revisions are published
- GP revisions are effective upon publication and will be published as early as July 23, 2025

O&G General Permit (GP) Updates

New Facility-Wide GP (GP12)

- Applies to O&G Well Production Facilities
 - Excluding Major Sources
- Limits more tailored to each piece of equipment (e.g similar to GP02)
- Intended to be single permit for all emitting equipment at facility
- Increased efficiencies in maintenance and implementation
- New NAAQS compliance mechanism
 - GP12 modeling tool based on thousands of AERMOD runs
- New format and organization of terms and condition for clarity and consistency
- Goal is for rollout in early 2026



COLORADO
Department of Public
Health & Environment

Resources to help with Permitting Efficiency

- Permit Section Memos ([PS Memos](#))
 - Document key permitting section policies
 - PS Memo 24-02 - Guidance and streamlined analysis for increases at Major Sources
 - PS Memo 25-02 - Forthcoming effort to compile all O&G storage tank guidance from existing memos
- Emission Calculation Manual ([ECM](#))
 - Currently includes storage tanks & gas venting/flaring from separators
 - Liquid loadout, NG-fired Engines coming soon...

Resources to help with Permitting Efficiency

- Emission Calculation and Regulatory Analysis Workbook ([ECRAW](#))
 - Includes sheets for most common equipment used in upstream and midstream O&G facilities
 - Working on updates to incorporate new rules and processes
- Permit Application/Registration Checklist ([Form APCD-100](#))
- Training Work-lead Position
- Feedback/ideas?

Thank you!

Questions/Feedback?

Contact: Brad Eades: bradley.eades@state.co.us or 303-692-3142



COLORADO
Department of Public
Health & Environment