

Submitted electronically at: <https://epcdevplanreview.com/>

The Colorado Department of Public Health and Environment (CDPHE) appreciates the opportunity to comment on this proposal. Please note that the following requirements are not intended to be an exhaustive list and it is ultimately the responsibility of the applicant to comply with all applicable rules and regulations.

Because the project may disturb greater than 1 acre, it will require a construction permit from the Water Quality Control Division.

Under Colorado Air Quality Control Commission regulations, land development refers to all land clearing activities, including but not limited to land preparation such as excavating or grading, for residential, commercial or industrial development. Land development activities release fugitive dust, a pollutant regulated by the Division. Small land development activities are not subject to the same reporting and permitting requirements as large land activities. Specifically, land development activities that are less than 25 contiguous acres and less than 6 months in duration do not need to report air emissions to the Division. However, it is important to note that even if a permit is not required, fugitive dust control measures included in the Land Development APEN Form APCD-223 must be followed at the site. Fugitive dust control techniques commonly included in the plan are included in the table below:

Control Options for Unpaved Roadways
Watering Use of chemical stabilizer Paving Controlling vehicle speed Graveling
Control Options for Mud and Dirt Carry-Out Onto Paved Surfaces
Gravel entry ways Washing vehicle wheels Covering the load Not overfilling trucks
Control Options for Disturbed Areas
Watering Application of a chemical stabilizer Revegetation Controlling vehicle speed Compaction Furrowing the soil Wind Breaks Minimizing the areas of disturbance Synthetic or Natural Cover for Slopes

The Land Development APEN Form APCD-223 and guidance document can be found here: <https://www.colorado.gov/pacific/cdphe/air/air-permit>. Click on "Land Development" to access the land development specific APEN form.

In addition to a Land Development APEN, small wastewater projects may use the following chart to estimate VOC and HAPs emissions in order to determine if they are required to submit an APEN under Regulation Number 3.

Pollutant	Emission Factor Lb/MM gallon	Reporting Threshold
VOC	3.49414	1 ton/year OR 2 ton/year
Hexamine	0.41207	250 lbs/year
Perchloroethylene	0.00890	
Benzene	0.22873	
Toluene	0.00267	
Total Xylene	0.00267	
Amonia	19.0000	

For more details about permits, best practices, technical assistance, etc., please contact CDPHE's Air Pollution Control Division. For questions concerning air permits, please contact Chip Hancock, Construction Permits Unit Supervisor, at 303-692-3168 or r.hancock@state.co.us.

Sincerely,

Sean Hackett
 Energy Liaison
 Colorado Department of Public Health and Environment

