



Dedicated to protecting and improving the health and environment of the people of Colorado

Submitted via email to: kariparsons@elpaso.com

September 13, 2018

El Paso County Planning Department
Attn: Kari Parsons
27 East Vermijo
Colorado Springs, CO 80903

Re: Case No. WSEO181

Dear Kari Parsons:

The Colorado Department of Public Health and Environment has the following comments on the proposed Expedition Water Solutions injection well request for comment (Case No. WSEO181).

In Colorado, most businesses that are or will be emitting air pollutants above certain levels are required to report those emissions to the Division by completing an Air Pollutant Emissions Notice (APEN). This is a two in one form for reporting air emissions and to obtain an air permit, if a permit will be required. While only businesses that exceed the AQCC reporting thresholds are required report their emissions, all businesses - regardless of emission amount - must always comply with the Colorado AQCC regulations.

Land development construction activities (earth moving) that are greater than 25 acres or more than **six months in duration** require an APEN from the Division and may be required to obtain an air permit depending on estimated emissions. In addition, a start-up notice must be submitted thirty days prior to beginning a land development project.

Please refer to the website <https://www.colorado.gov/pacific/cdphe/air-permits> for information on land use APENs and permits forms. Click on Construction Permit and APEN forms, and then click on the "Specialty APENs" to access the land development specific APEN form.



Additional information on APENs and air permits can be found at <https://www.colorado.gov/pacific/cdphe/apen-and-permitting-guidance>. This site explains the process to obtain APENs and air quality permits, as well as information on calculating emissions, exemptions, and additional requirements. You may also view AQCC Regulation Number 3 at <https://www.colorado.gov/pacific/cdphe/aqcc-regs> for the complete regulatory language. If you have any questions regarding Colorado's APEN or air permitting requirements or are unsure whether your business operations emit air pollutants, please call the Small Business Assistance Program (SBAP) at 303-692-3175 or 303-692-3148.

Please contact Sean Hackett at 303-692-3662 with any questions.

Sincerely,

Sean Hackett
Environmental Protection Specialist
Colorado Department of Public Health and Environment

