COLORADO
Department of Public Health & Environment

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

Kari Parsons
Project Manager
El Paso County

VIA EMAIL
RE: Cherokee MD PFAS Treatment Plant 1041

Dear Kari Parsons,

The Colorado Department of Public Health and Environment's Air Pollution Control Division (APCD or Division) received a request for an air quality administrative review concerning the proposed Cherokee MD PFAS Treatment Plant project as described in your correspondence dated October 28. The Division has reviewed the project letter and respectfully offers the following comments. Please note that the following Air Quality Control Commission (AQCC) regulations may not be inclusive of the regulations the proposed project will be subject to. It is the responsibility of the involved parties to determine what regulations they are subject to and follow them accordingly.

Land Development

We also note that projects similar to this proposal often involve land development. Under Colorado air quality 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 regulation 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. It is important to note that even if a permit is not required, fugitive dust control measures including 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

Please refer to the website https://cdphe.colorado.gov/apens-and-air-permits for information on land use APENs and permit forms. Click on "Land Development" to access the land development specific APEN form. Please contact KC Houlden, Construction Permits Unit Supervisor, at 303-691-4092, kenneth.houlden@state.co.us if you have any specific questions about APENs and permit forms.

VOC and Hazardous Air Pollutants (HAPS) Analysis for Small Wastewater Projects

An Air Pollutant Emissions Notice (APEN) for VOC and HAPS may be required depending on the existing and new throughput of your facility. Municipal 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	
Ammonia	19.0000	

If you have any other questions or need additional information, please use the contact info listed above, or e-mail or call me directly. Thank you for contacting the Air Pollution Control Division about your project.

Sincerely,
Brendan Cicione
Air Quality and Transportation Planner
General SIP Unit
Air Pollution Control Division
Colorado Department of Public Health and Environment
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