October 10, 2013

Karen Miller  
Facilities Management  
University of Colorado

RE: University of Colorado-Boulder West and East District Energy Plants  
Summary of Environmental Compliance and Permitting Support

Dear Karen:

Air Resource Specialists, Inc. (ARS) has prepared the following summary of the environmental services we provide to the University of Colorado – Boulder (UCB) Powerhouse. This summary is being provided as part of renewing the annual Standing Purchase Order between ARS and UCB. UCB operates under permits issued by the Colorado Department of Public Health and Environment (CDPHE) and CDPHE’s Air Pollution Control Division (APCD). A list of anticipated/expected services to be provided throughout 2012 and 2013:

- Coordinate 40 CFR 60 Appendix F quality control activities for the Continuous Emissions Monitoring System (CEMS), including required cylinder gas audits (CGAs) and relative accuracy test audits (RATA). Prepare specifications, solicit bids, and assist in the selection of a contractor for the annual RATA test. Review draft protocol and report before submittal to APCD;
- Conduct quarterly on-site environmental audits, and review/collect data for use in each CEMS reporting period;
- Prepare quarterly CEMS reports for submittal to APCD;
- Prepare semi-annual Title V monitoring and deviation reports for submittal to APCD;
- Prepare annual Title V certification of compliance report for submittal to APCD and EPA;
- Update and maintain the facility 12-month rolling emission tracking spreadsheet;
- Provide support during ACPD and/or EPA facility inspections;
- Coordinate and secure the annual stormwater sampling event and laboratory analysis;
- Prepare the annual stormwater report for submittal to CDPHE;
- Collect data, determine campus-wide emissions, prepare supporting documentation, and upload annual greenhouse gas (GHG) report for submittal to EPA;
• Assist UCB staff responsible for permit compliance as necessary;
• Conduct annual on-site training on air and water permits for Powerhouse personnel;
• Maintain and update as necessary the GHG Monitoring Plan;
• Revise the facility Stormwater Management Plan to reflect the new CDPHE General Permit;
• Provide regulatory interpretation on applicability for new rules and regulations (e.g. MACT/NSPS);
• Renew/revise air and water permits as required;
• Project management and administration, including invoicing and preparation of monthly financial and technical progress reports;

The tasks listed above for the Powerhouse are also expected to be performed at the new East District Energy Plant (EDEP). Additional compliance tasks are anticipated after the completion of the new (EDEP). A summary of those tasks are provided below.

• Provide assistance with the East District Energy Plant initial operations;
  • Prepare necessary notifications (e.g. startup);
  • Coordinate stack testing (emission limits compliance);
  • Prepare stormwater permit application;
  • Prepare stormwater management plan;
  • Prepare an emission tracking spreadsheet for the EDEP upon operation.

ARS is well qualified to assist UCB with these tasks. ARS currently provides ongoing support for the Title V air permitting and stormwater compliance at the UCB Powerhouse and Williams Village. ARS is also assisting UCB in securing the necessary permits for the new Cooling and Heating Plant. The ARS’ staff is very knowledgeable about UCB’s processes and the environmental regulations affecting the university. ARS’ technical strength is our extensive industry experience, past working relationships with UCB, a broad understanding of the environmental control requirements and regulations impacting universities, and professional working relationships with permitting staff at CDPHE. I am confident that ARS will continue to provide the necessary technical and regulatory skills to help UCB maintain compliance with all of their permits and the applicable regulations.

ARS provides qualified preferred customers with a discount of 5% on labor charges. Preferred customers are those clients who provide ARS with technical work on a non-competitive basis and who authorize such work within 30 days of receipt of a project budget from ARS. The University currently enjoys and will continue to receive this discount. Attached please find ARS’ Labor Rates and Commercial Terms, which provide more specific details about ARS’ costs.
If there are any questions regarding our proposal, you may contact me at 970.484.7941 or by email at amartinkus@air-resource.com. Thank you for considering ARS for this work.

Sincerely,

Aaron A. Martinkus  
Project Manager  
Environmental Compliance Section