



COLORADO
Department of Public
Health & Environment

Issued on: December 8, 2023 via david@cleanconnect.ai

David Conley
Clean Connect AI, Inc.
7352 Greenridge Road, Unit A9
Windsor, CO 80550

RE: Approval of Request for Clean Connect Monitoring System and Work Practices to be an Alternative Approved Instrument Monitoring Method for Colorado Air Quality Control Commission (AQCC) Regulation No. 7, Part B, Sections I & II STEM and LDAR Requirements

Dear David Conley:

The Air Pollution Control Division (division) reviewed Clean Connect AI, Inc.'s application dated February 28, 2022, applying for approval of the Clean Connect Monitoring System and Work Practices (Clean Connect) as a proposed Alternative Approved Instrument Monitoring Method (Alternative AIMM) for purposes of AQCC Regulation No. 7 Storage Tank Emission Management (STEM) monitoring and Leak Detection and Repair (LDAR) requirements. That application, along with information provided to the division as described in the supplemental information and division summary, is sufficient for the division to issue an approval letter for Clean Connect as an Alternative AIMM under the Non-Quantitative Classification. Please review AQCC Regulation No. 7, Part B, Section II.E. for the requirements for terms of use under the Non-Quantitative Classification.

On May 5, 2023, the division submitted to EPA all application materials and supplemental information, including the conditions found under Regulation No. 7, Part B, Section I.L.8.a.(ii). The division did not receive a response from EPA regarding the approval or disapproval of the proposed Alternative AIMM within the allotted six months. Consistent with Regulation No. 7, Part B, Section I.L.8.a.(v), Clean Connect is now approved as an Alternative AIMM for use statewide, and within the 8-hour ozone control area and northern Weld County.

The use of Clean Connect is approved provided the following additional conditions are met:

1. The facility operator **must** follow the Work Practices for the Clean Connect Monitoring System established in Sections 5 (Operator Leak Classification Standard Operating Procedure) and 7 (Proposed Work Practices) of the application supplement. Figure 14 in Section 7.b.ii of the application supplement provides the work practice that must be followed when a detection event is reported by the system.
2. The Clean Connect optical gas imaging (OGI) camera(s) must be located no more than 100 meters from any components to be monitored. Additionally, the OGI camera(s)



must be located, positioned, and operated such that all equipment groups at a facility subject to monitoring are adequately monitored, meaning any potential emissions from those components can be detectable by the system. Components inside large fully enclosed spaces (such as a compressor building) will require a Clean Connect camera installation inside the enclosed space to ensure adequate monitoring or will require a handheld AIMM inspection according to the applicable monitoring schedule in AQCC Regulation No. 7, Part B, Sections I.L, II.C, or II.E.

3. The operator of a facility monitored by Clean Connect must retain and make available for inspection upon request a copy of this approval letter.

For the facilities subject to Title V Operating Permit requirements: Division-approved Alternative AIMM (other than infrared camera or EPA Method 21) must be documented within each Title V Operating Permit. A complete Title V modification application or revision to a previously submitted application must be submitted by any operator seeking to use Clean Connect at a facility prior to implementation.

Please note that the division is making this determination based on a reliance on the validity and accuracy of the information provided by Clean Connect AI, Inc. in its submittal and through working meetings identified in the divisions' Summary of the Alternative AIMM. Please do not hesitate to contact me at 303-921-8134 or jennifer.mattox@state.co.us if you have any questions regarding this letter or would like to further discuss this approval. Thank you.

Sincerely,



Jennifer Mattox
Compliance Monitoring Section Manager
Oil & Gas Program
Colorado Air Pollution Control Division

cc:

