

Issued on: January 17, 2025

Stefan Boekamper  
KUVA Systems, Inc.  
1035 Cambridge St, Suite 10A  
Cambridge MA 02141

RE: Approval of Request for KUVA Systems, Inc. and Work Practices to be an Alternative Approved Instrument Monitoring Method for Colorado Air Quality Control Commission (AQCC) Regulation No. 7 STEM and LDAR Requirements

Dear Stefan:

The Air Pollution Control Division (division) reviewed KUVA Systems, Inc.'s application dated March 27, 2023, applying for approval of the KUVA System and Work Practices (KUVA) 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 KUVA as an Alternative AIMM under the Non-Quantitative Classification. Please review AQCC Regulation No. 7, Part B, Sections I.L. & II.E. for the requirements for terms of use under the Non-Quantitative Classification.

On May 30, 2024, 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), KUVA is now approved as an Alternative AIMM for use statewide, and within the 8-hour ozone control area and northern Weld County.

The division approves the use of KUVA as an Alternative AIMM by operators of facilities subject to AQCC Regulation No. 7 STEM monitoring and LDAR requirements provided the following additional conditions are met:

1. The facility operator **must** follow the Work Practices for the KUVA system established in Section 4 (Proposed AAIMM Work Practices) of the application supplement. Figure 11 in Section 4.2.3 of the application supplement provides the work practice that must be followed when a detection event is reported by the system.

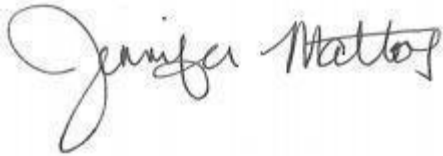


2. The KUVA System shortwave infrared (SWIR) spectroscopy camera(s) must be located no more than 120 meters from any components to be monitored. Additionally, the camera(s) must be located, positioned, and operated such that all equipment groups at a facility subject to monitoring are adequately monitored, meaning any potential emissions from those components can be detectable by the system. Components inside enclosed spaces (such as a compressor building) will require a handheld AIMM inspection according to the applicable monitoring schedule in AQCC Regulation No. 7, Part B, Sections I.L and II.E.
3. The operator of a facility monitored by KUVA 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 the KUVA system 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 KUVA Systems, Inc. in its submission 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](mailto: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:

