MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT #TRD3238-01

Permitting and Compliance Division
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NE¼ of the SE¼ of Section 30, Township 21 North, Range 4 East, Cascade County, MT
415 US Highway 87
Great Falls, MT 59404

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Method 5, 7 through 7E, 9, 10 or 10B
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #3238-06
New Source Performance Standards (NSPS)	X		40 CFR 60 Subpart Dc
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR) – includes Prevention of Significant Deterioration (PSD) and/or Non-attainment Area (NAA) NSR		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
Compliance Assurance Monitoring (CAM)	X		40 CFR 64
State Implementation Plan (SIP)	X		General SIP

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the U.S. Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the application submitted by Malteurop North America, Inc. (Malteurop) on June 29, 2012.

B. Facility Location

The Malteurop facility is located approximately 2 miles north of the City of Great Falls, Montana, and approximately ½ mile west of Black Eagle Road. The legal description of the facility site is the NE¼ of the SE¼ of Section 30, Township 21 North, Range 4 East, in Cascade County, Montana.

C. Facility Background Information

Montana Air Quality Permit History

On May 17, 2003, International Malting Company, LLC (IMC) was issued final **Montana Air Quality Permit (MAQP) #3238-00** for the operation of a barley malt manufacturing plant with an initial Phase I malt and salable malt by-product production capacity of 10 million bushels per year and a final plant (after Phase II) capacity of 16 million bushels per year. The initially permitted IMC plant incorporated the following equipment:

On April 12, 2005, the Department of Environmental Quality – Air Resources Management Bureau (Department) received a complete application for the modification of IMC's MAQP #3238-00. Specifically, the modification included the replacement of 8 fabric filter baghouses (total air-flow capacity of 215,000 dry standard cubic feet per minute (dscfm) with a single fabric filter baghouse (air-flow capacity of 66,800 dscfm); replacement of the 14 previously permitted process and booster heaters (total heat input capacity 288.2 million British thermal units per hour (MMBtu/hr) with 6 proposed process heaters (total heat input capacity of 218.64 MMBtu/hr); modification of the heating system from air-to-air heat exchangers to air-to-glycol heat exchangers; change in plant layout and configuration; increase in the allowable fabric filter baghouse grain loading limit from 0.005 grains per dry standard cubic feet (gr/dscf) to 0.010 gr/dscf; and a reduction in the allowable amount of elemental sulfur (S) combusted per batch of malt from 500 pounds of S per batch (lb S/batch) to 200 lb S/batch. **MAQP #3238-01** replaced MAQP #3238-00.

On July 6, 2005, the Department received a complete permit application from IMC for the modification of MAQP #3238-01. Specifically, IMC proposed the installation and operation of two new fabric filter baghouse control units for grain receiving and product load-out operations, respectively. The baghouse controlling grain receiving operations has a maximum nominal flow rate of 7250 dscfm and a particulate matter with an aerodynamic diameter of 10 microns or less (PM_{10}) emission limit of 0.01 gr/dscf resulting in the Potential to Emit (PTE) 2.72 tons per year (TPY) of PM_{10}. The product load-out baghouse will have a maximum nominal flow rate of 3480 dscfm and a PM_{10} emission limit of 0.01 gr/dscf, resulting in the PTE 1.31 TPY of PM_{10}.

In addition, the main process baghouse (BF01) flow rate used in the ambient air quality impact analysis conducted for MAQP #3238-01 was incorrectly reported as 59,335 actual cubic feet per minute (acfm). The correct flow rate for the affected unit is 77,404 acfm (66,800 dscfm). The modeling analysis submitted for the affected permit action addressed this correction.

Further, on August 22, 2005, the Department received comments from IMC on the Department's Preliminary Determination (PD). Specifically, IMC requested the removal of the 1-hour averaging time period requirement for the applicable baghouse pound per hour (lb/hr) emission rate limits and the removal of the applicable baghouse flow-rate limitations included in the PD.

Based on the information contained in the comment letter, the Department recognized that the 1-hr averaging times for the lb/hr applicable baghouse emission limits have the effect of creating an overly stringent compliance demonstration for the affected units, in this case. Further, because the permit imposed grain loading and lb/hr emission limits on the baghouse(s) and because these limits together ensure that compliant actual emissions will not exceed emissions analyzed under the ambient air quality impact analysis conducted for the permit modification, the Department determined that the baghouse flow-rate limitations represented redundant permit requirements, in this case. Therefore, the Department modified the compliance source test requirement for the affected units to specify that the testing, including averaging times, be conducted pursuant to Method 5 and removed the subject baghouse flow-rate conditions under the Date of Decision (DD). **MAQP #3238-02** replaced MAQP #3238-01.

On November 16, 2006, the Department received notification of proposed changes in operations at the IMC facility in accordance with the provisions contained in the Administrative Rules of Montana (ARM) 17.8.745 (de minimis rule). Specifically, IMC proposed a change in the actual location of the facility fabric filter baghouses and kiln vents, updates to the kiln building dimensions, a change in the type of emission source for baghouse BF03 from a point source to a volume source, and a change in the type of emission source for the kiln vents from volume sources to point sources. The Department determined that all proposed changes could be accomplished in accordance with the de minimis rule.

However, in accordance with ARM 17.8.745(1)(a)(iii) because the current permit action would result in changed conditions of operation at the IMC facility that would affect the plume rise or dispersion characteristics of IMC emissions, IMC was required to submit an ambient air impact analysis (modeling) to demonstrate compliance with the applicable standards. A detailed discussion of ambient impacts associated with the changed conditions of operation at the IMC facility is contained in Section VI, Ambient Air Impact Analysis, of the Permit Analysis to this permit. Further, in accordance with ARM 17.8.745(1)(a)(i) and ARM 17.8.745(2), because the proposed permit action changed the stack on BF02 and BF03 from a vertical to horizontal or downward exhaust and thereby violate an existing condition in the IMC permit (Section II.A.17, MAQP #3238-02), an Administrative Amendment in accordance with ARM 17.8.764 is required for the current permit action. Because modeling conducted for the current permit action shows compliance with all applicable standards without relying on unobstructed vertical stacks for BF02 and BF03, Section II.A.17 of MAQP #3238-02, which required unobstructed vertical stacks on the affected units, was removed under the current permit action. **MAQP #3238-03** replaced MAQP #3238-02.

On February 14, 2008, the Department received a request for an administrative amendment to MAQP #3238-03 to change the corporate name from IMC to Archer Daniels Midland Company – Malting. This permit action changed the name on MAQP #3238-03. **MAQP #3238-04** replaced MAQP #3238-03.

On February 9, 2009, the Department received a request for an administrative amendment to MAQP #3238-04 to change the corporate name from Archer Daniels Midland Company – Malting to Malteurop. This permit action changed the name on MAQP #3238-04 and updated the permit to reflect the current permit language and rule references used by the Department. **MAQP #3238-05** replaced MAQP #3238-04.

On October 12, 2011, the Department received a permit modification request to add a new natural gas fired heater to the facility. Additionally, Malteurop requested to update the description of an existing boiler from "Future Plant Heater" to "HEATEC Heater #3". The newest heater is identical to the HEATEC Heater #3 and minor description edits for HEATEC Heater #3 were incorporated to reflect the "input" heater ratings rather than the "output" rating. Each of HEATEC Heaters #3 and #4 has an input rating of 57.7 MMBtu/hr. The potential emissions associated with HEATEC Heater #3 were increased to match HEATEC Heater #4 and updated in the emission inventory within the permit analysis. Additionally, the heater input ratings for the other existing heaters were revised slightly based on information provided by Malteurop and the carbon monoxide (CO) and oxides of nitrogen (NO_x) limits adjusted accordingly based on AP-42 emission factors.

On January 26, 2009, the Department received a de minimis request regarding the relocation of the product load-out baghouse (BF03). This request was reviewed and approved via letter dated March 18, 2009. There were no changes in emissions associated with the change. The request was made to improve worker safety and allow easier access for maintenance. The de minimis request and approval was inadvertently not added to MAQP #3238-05 but was incorporated into the permit. **MAQP #3238-06** replaced MAQP #3238-05.

Title V Operating Permit History

Potential emissions from the initially proposed and permitted plant exceeded the applicable major source Title V permitting thresholds; therefore, on February 26, 2005, IMC was issued final and effective **Title V Operating Permit #OP3238-00**.

Following the April 12, 2005 submittal, it was determined that IMC was no longer subject to Title V and on June 21, 2005, the Department revoked IMC's Title V operating permit.

D. Current Permit Action

On June 29, 2012, the Department received an application for a Title V Operating Permit triggered by the Tailoring Rule for greenhouse gasses (GHGs). Malteurop has a total emission inventory of GHGs of 113,111 TPY carbon dioxide equivalent (CO2e) based on their October 12, 2011, application to the Department. Therefore, under the Tailoring Rule all existing facilities that are above 100,000 TPY CO2e are required to submit an application for a Title V Operating Permit. This action will result in the issuance of Title V Permit with the designation **Operating Permit #OP3238-01**.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 105, Montana Code Annotated (MCA), the Department has conducted a private property taking and damaging assessment and has determined there are no taking or damaging implications. The checklist was completed on November 13, 2012.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

F. Compliance Designation

As of November 13, 2012, the Malteurop facility continues to operate and is currently permitted under MAQP # 3238-06. The facility was last inspected on May 16, 2012, with the last full compliance evaluation (FCE) completed on October 21, 2003. No additional FCEs were necessary once the facility was no longer a Title V facility following the revocation in 2005.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

Malteurop operates a barley malt manufacturing plant with a malt and salable malt by-product production capacity of 16 million bushels per year. A complete list of equipment is contained in Section I.A of the permit analysis for this permit.

The Malteurop plant incorporates the following current equipment:

- Up to four (4) steeping vessels, each 20-meters in diameter
- Up to eight (8) germinating vessels, each 31-meters in diameter
  Seven (7) natural gas-fired process heaters (which indirectly heat the two (2) kilns via water/air heat exchangers)
- A barley washer
- Eighty (80) silos for storing barley and malt products
- Three process fabric filter baghouses including a main process fabric filter baghouse (BF01) with an air-flow capacity of 66,800 dscfm, a grain (barley) receiving fabric filter baghouse (BF02) with an air-flow capacity of 7,250 dscfm, and a product load-out fabric filter baghouse (BF03) with an air-flow capacity of 3,480 dscfm
- Associated equipment

Malt is the processed form of barley grain and the basic ingredient in the production of beer. Malting is the process by which barley is transformed into malt. The process begins with "steeping" or soaking of clean barley kernels in large tanks of water called "steeping vessels." After steeping, the barley is then removed from the steeping vessels and placed in a germinating vessel. After a period of germination, the barley is dried and roasted in a kiln to stop the germination process and reduce the moisture content of the product, now considered malt. At this stage of the process the malt product can be easily stored and/or shipped to various locations for further processing.

B. Emission Units and Pollution Control Device Identification

The emission units regulated by this permit are the following (ARM 17.8.1211):

Emissions Unit ID	Description	Pollution Control Device/Practice
EU01	Main Process Baghouse (BF01)	
EU02	Grain Receiving Baghouse (BF02)	
EU03	Product Loadout Baghouse (BF03)	
EU04	MOCO Heater #1	
EU05	Johnston Heater #1	
EU06	Johnston Heater #2	
EU07	HEATEC Heater #1	LNB with FGR
EU08	HEATEC Heater #2	LNB with FGR
EU09	HEATEC Heater #3	LNB with FGR
EU10	HEATEC Heater #4	LNB with FGR
EU11	Kiln #1	
EU12	Kiln #2	
EU13	Barley Receiving Bins	Enclosure
EU14	Malt Loadout Spout	Enclosure
EU15	Road Emissions	

C. Categorically Insignificant Sources/Activities

Malteurop did not identify insignificant sources/activities and therefore none are shown. Because there are no requirements to update such a list, the emissions units and/or activities considered insignificant may change in the future.

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Facility-Wide Production / Process Limits

Malteurop is limited to a maximum of 16 million bushels of malt and salable malt by-product per year. This limit is based on the maximum production level as allowed under Malteurop's MAQP #3238-06.

Further, Malteurop is limited to a maximum barley throughput of 456,000 TPY. This limit is based on the maximum production level allowed under Malteurop's MAQP #3238-06.

Raw Material and Product Handling including EU01 thru EU03, and EU13 and EU14

All emissions (fugitive and stack including stack discharges from EU01 thru EU03) from material handling operations at the Malteurop plant are limited to a maximum opacity of 20% averaged over 6 consecutive minutes. This limit is established for stack emissions in accordance with the provisions of ARM 17.8.304(2).and for fugitive emissions in accordance with the provisions of ARM 17.8.308.

PM_{10} emissions from EU01, EU02 and EU03 shall be limited to 0.010 gr/dscf of air-flow (ARM 17.8.749).

All barley preparation processes shall be located within the enclosed headhouse and shall be vented to fabric filter baghouse control. Through case-by-case analysis, these requirements were established as best available control technology (BACT).

All barley shipments shall be unloaded to underground hoppers that are vented to a fabric filter baghouse. Through case-by-case analysis, these requirements were established as BACT.

All malt and salable malt by-product shall be loaded for shipment via covered conveyors, which are vented to fabric filter baghouse control. Through case-by-case analysis, these requirements were established as BACT.

All material transfer points for grain receiving and off-loading operations shall utilize at least 3-sided enclosure for the control of fugitive dust emissions. Through case-by-case analysis, these requirements were established as BACT.

EU11 and EU12 – Kiln Operations (Kiln #1, Kiln #2)

All emissions from kiln operations at the Malteurop plant are limited to a maximum opacity of 20% averaged over 6 consecutive minutes. This limit is established for stack emissions in accordance with the provisions of ARM 17.8.304(2).

Sulfur dioxide (SO_2) emissions from each kiln shall be limited to 33.33 lb/hr during elemental sulfur burning (ARM 17.8.749).

Elemental sulfur burning for kiln operations shall be limited to 200 lb S/batch (ARM 17.8.749).

Total elemental sulfur burning for kiln operations (cumulative for both kilns) shall be limited to 146,000 pounds during any rolling 12-month time period (ARM 17.8.749).

Total elemental sulfur burning for kiln operations (cumulative for both kilns) shall not exceed 2190 hours during any rolling 12-month time period (ARM 17.8.749).

The cumulative allowable time (total for both kilns) that elemental sulfur may be combusted at the Malteurop site is limited to 2190 hours during any rolling 12-month time period. This limit was established based on the maximum elemental sulfur combustion analyzed under the ambient air quality impact analysis conducted for issuance of MAQP #3238-00.

Kiln fuel is limited to the combustion of pipeline quality natural gas. Through case-by-case analysis, this requirement was established as BACT.

Each kiln shall include a screw auger for movement of malt product/by-product out of the kiln and the kiln heat exchanger shall be located at the top of each kiln (ARM 17.8.749).

<u>EU04 thru EU10 – Process Heaters</u>

All emissions from process/booster heater operations at the Malteurop plant are limited to a maximum opacity of 20% averaged over 6 consecutive minutes. This limit is established for stack emissions in accordance with the provisions of ARM 17.8.304(2).

Emissions from each of the process heaters are limited to the following emission rates. These limits were established based on the maximum allowable operations demonstrating compliance with applicable ambient air quality standards analyzed under the various MAQP permitting actions. Newer heaters have lower BACT limits versus the first heaters installed at the facility.

EU04 MOCO Process Heater #1

NOx	5.24 lb/hr
CO	4.40 lb/hr

EU05 Johnston Process Heater #1

NOx	2.39 lb/hr
CO	2.01 lb/hr

EU06 Johnston Process Heater #2

NOx	2.39 lb/hr
CO	2.01 lb/hr

EU07 HEATEC Heater #1

NOx	1.32 lb/hr
CO	2.22 lb/hr

EU08 HEATEC Heater #2

NOx	1.69 lb/hr
CO	2.83 lb/hr

EU09 HEATEC Heater #3

NOx	2.83 lb/hr
CO	4.75 lb/hr

EU10 HEATEC Heater #4

NOx	2.11 lb/hr
CO	2.83 lb/hr

Malteurop shall burn only pipeline quality natural gas in the process/booster heaters (ARM 17.8.752).

Malteurop shall utilize dry low NO_x combustion technology to control emissions from the HEATEC Heater #1, HEATEC Heater #2, and HEATEC Heater #3 (ARM 17.8.752).

Malteurop shall utilize low NO_x burners and flue gas recirculation to control emissions from HEATEC Heater #4 (ARM 17.8.752).

Malteurop shall not exceed a 57.7 MMBtu/hr input on HEATEC Heater #4 (ARM 17.8.749).

B. Monitoring Requirements

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements are contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance do not require the permit to impose the same level of rigor for all emission units. Furthermore, they do not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

The permit includes periodic monitoring or recordkeeping for each applicable requirement. The information obtained from the monitoring and recordkeeping will be used by the permittee to periodically certify compliance with the emission limits and standards. However, the Department may request additional testing to determine compliance with the emission limits and standards.

C. Test Methods and Procedures

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm its compliance status.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Great Falls Tribune* newspaper on February 1, 2013. The Department provided a 30-day public comment period on the draft operating permit from February 1, 2013, to March 4, 2013. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
None received		

D. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Section I, General Information, Page 1, Description of Process	Malteurop North America, Inc. (MENA) requests that the language in these two sentences be changed to the following, to more accurately reflect that the permitted number of vessels have not yet been installed. Only three (3) of the steeping vessels, and six (6) of the germinating vessels are currently installed at the plant. · Up to four (4) steeping vessels, each 20-meters in diameter · Up to eight (8) germinating vessels, each 31-meters in diameter	Department has modified to reflect request and also updated the language within the TRD.
Section I, General Information, Page 1, Description of Process	MENA requests that the language in the sentence be changed to the following, to more accurately reflect the fuel combustion sources regarding the kilns:	Department has modified to reflect request and also updated the language within the TRD.

	· Seven (7) natural gas fired process heaters (which indirectly heat the two (2) kilns via water/air heat exchangers)	
Section III, Permit Conditions, Page 8, Condition C.8.	The frequencies listed in the condition above appear to contradict one another. In the first paragraph, the Method 9 (and Method 5) tests are required to be performed on a variable frequency, dependent upon the source. No frequency listed is less than an annual basis. Then, the second paragraph requires MENA to perform a Method 9 semiannually, or institute a weekly survey. In addition, the first paragraph requires MENA to perform Method 9 tests, and the second provides it as a compliance option. MENA requests that the Department clarify the intended frequency of, and the option to perform, the Method 9 Visual Observations, should MENA select that compliance option.	Department has clarified the intended frequency for these sources as annual, every 2 years and every 3 years for BF01, BF02, and BF03, respectively. The semiannual requirement has been removed but the weekly survey option has been maintained.
Section III, Permit Conditions, Page 9, Condition C.9.	The frequencies listed in the condition above appear to contradict one another. In the first paragraph, the Method 9 tests are required to be performed on an "as required by the Department" basis. Then the second paragraph requires MENA to perform a Method 9 semiannually, or institute a weekly survey. MENA requests that the Department clarify the intended frequency of the Method 9 Visual Observations, should MENA select that compliance option.	Department has clarified the language for C.9 by removing the first paragraph under C.9.
Section III, Permit Conditions, Page 14, Condition E.7.	The frequencies listed in the condition above appear to contradict one another. In the first paragraph, the Method 9 tests are required to be performed on an "as required by the Department" basis. Then the second paragraph requires MENA to perform a Method 9 semiannually, or institute a weekly survey. MENA requests that the Department clarify the intended frequency of the Method 9 Visual Observations, should MENA select that compliance option. Additionally, if required to do so on an ongoing basis, MENA questions the compliance demonstration benefit of performing opacity observations on a natural gas-fired source. These sources already use the cleanest, abundantly available fuel for combustion. Particulate emissions from a natural-gas fired source are extremely low, with effectively	Department has clarified the language for E.7. The Method 9 visual survey option has been changed to annual to reduce the reporting burden for these natural gas fired sources if MENA opts for the Method 9 over visual surveys. If MENA wants to request an administrative amendment after additional data is available, the Department will reconsider the request at that time. Other references under Condition E affected by this change have also been modified.

	zero visible emissions. MENA believes the additional monitoring, recordkeeping and reporting burden is not commensurate with the perceived environmental benefit. Demonstrating compliance with Condition E.3. (combustion of pipeline quality natural gas) ensures compliance with Condition E.1. (20% opacity limit). MENA requests the removal of the ongoing requirement to perform Method 9 tests on the process heaters (EU04-EU10), and replace the frequency with "As required by the Department."	
Appendix D – Air Quality Inspector Information, Page D-1, Item #2.	Safety of the workforce and all visitors is paramount to the success of the Great Falls Malting Plant. Therefore, MENA requests that Item #2 listed above be modified to include the required Personal Protective Equipment for all visitors to the Great Falls Malting Plant: 2. Safety Equipment Required: Hard hat, safety shoes, safety glasses and hearing protection as required.	Department has modified to reflect request.

Person/Group Commenting	Comment	Change
Craig Henrikson MDEQ	In review of the visual survey language issues raised by MENA, minor wording changes were also made to Section III, Permit Condition D.	Visual survey was made to be an "or" condition and frequency was changed to semiannual within the summary table.

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Pursuant to ARM 17.8.1221, Malteurop requested a permit shield for all non-applicable regulatory requirements and regulatory orders identified in Section 7.1 of the Malteurop Title V Operating Permit Application.

The following table outlines those requirements that Malteurop had identified as non-applicable in the permit application, but, after Department review, will not be included in the operating permit as non-applicable. The table includes both the applicable requirement and reason that the Department did not identify this requirement as non-applicable.

Rule Citation	Reason
40 CFR 50 40 CFR 51 40 CFR 58 40 CFR 71	Although these rules contain requirements for the regulatory authorities and not major sources, these rules can be used as authority to impose specific requirements on a major source.
40 CFR 52, ARM 17.8.1001 ARM 17.8.1101	These rules do not have specific requirements and may or may not be relevant to a major source and should never be listed in the applicable or non-applicable requirements.
40 CFR 62 40 CFR 69 40 CFR 70	These rules do not have specific requirements and are always relevant to a major source and should never be listed in the applicable or non-applicable requirements.
40 CFR 61, Subpart M 40 CFR 63, Subpart A and Subpart B 40 CFR 68 ARM 17.8.120 et seq. ARM 17.8.514 ARM 17.8.515 ARM 17.8.611 ARM 17.8.612 ARM 17.8, Subchapter 8 ARM 17.8, Subchapter 9	These rules are procedural and have specific requirements that may become relevant to a major source during the permit span.
ARM 17.8, Subchapter 7	These rules are applicable to the source and may contain specific requirements for compliance.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards (Part 63)

As of the date of issuance of this permit, the Department is unaware of any future MACT standards that may be promulgated that will affect this facility.

B. NESHAP Standards (Part 61)

As of the date of issuance of this permit, the Department is unaware of any future NESHAPs standards that may be promulgated that will affect this facility.

Asbestos abatement projects and building demolition/renovation activities will be conducted in accordance with applicable asbestos regulatory requirements. Those regulatory requirements include, but are not limited to 29 CFR 1926.1101; 40 CFR 763 Sections 120, 121, 124, and Subpart E; 40 CFR Part 61, Subpart M; State of Montana Asbestos Control Act 75-2-501 through 519 MCA, and State of Montana Occupational Health Rules ARM 17.74.301 through 406. State-accredited asbestos abatement personnel shall conduct the abatement of regulated asbestos-containing materials. Asbestos-containing waste materials shall be transported properly and disposed of in a State-approved landfill.

C. NSPS Standards

As of the date of issuance of this permit, the Department is unaware of any future NSPS standards that may be promulgated that will affect this facility. The only identified NSPS standard currently applicable is 40 CFR 60 Subpart Dc.

D. Risk Management Plan

As of the date of issuance of this permit, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; three years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.

E. CAM Applicability

An emitting unit located at a Title V facility that meets the following criteria listed in ARM 17.8.1503 is subject to Subchapter 15 and must develop a CAM Plan for that unit:

- The emitting unit is subject to an emission limitation or standard for the applicable regulated air pollutant (unless the limitation or standard that is exempt under ARM 17.8.1503(2));
- The emitting unit uses a control device to achieve compliance with such limit; and
- The emitting unit has potential pre-control device emission of the applicable regulated air pollutant that is greater than major source thresholds.

F. PSD and Title V Greenhouse Gas Tailoring Rule

On May 7, 2010, EPA published the "light duty vehicle rule" (Docket # EPA-HQ-OAR- 2009-0472, 75 FR 25324) controlling GHG emissions from mobile sources, whereby GHG became a pollutant subject to regulation under the Federal and Montana Clean Air Act(s). On June 3, 2010, EPA promulgated the GHG "Tailoring Rule" (Docket # EPA-HQ-OAR-2009-0517, 75 FR 31514) which modified 40 CFR Parts 51, 52, 70, and 71 to specify which facilities are subject to GHG permitting requirements and when such facilities become subject to regulation for GHG under the PSD and Title V programs.

Under the Tailoring Rule, any PSD action (either a new major stationary source or a major modification at a major stationary source) taken for a pollutant or pollutants other than GHG that would become final on or after January 2, 2011 would be subject to PSD permitting requirements for GHG if the GHG increases associated with that action were at or above 75,000 TPY of CO_2e and greater than 0 TPY on a mass basis. Similarly, if such action were taken, any resulting requirements would be subject to inclusion in the Title V Operating Permit. Facilities which hold Title V permits due to criteria pollutant emissions over 100 TPY would need to incorporate any GHG applicable requirements into their operating permits for any Title V action that would have a final decision occurring on or after January 2, 2011.

Malteurop has a total emission inventory of GHGs of 113,111 TPY CO2e based on their October 12, 2011, MAQP application to the Department. Therefore, under the Tailoring Rule all existing facilities that are above 100,000 TPY CO2e were required to submit an application for a Title V Operating Permit before July 1, 2012. Malteurop submitted a timely Title V Operating Permit application and will be subject to the permit requirements once the final is issued.