MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
TITLE V OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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Plum Creek Northwest Lumber, Inc.
Ksanka Mill Site
P.O. Box 1990
Fortine, Montana 59918

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 and 9
Ambient Monitoring Required		X	NA
COMS Required		X	NA
CEMS Required		X	NA
Schedule of Compliance Required		X	NA
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	NA
Quarterly Reporting Required		X	NA
Applicable Air Quality Programs			
ARM Subchapter 7 Preconstruction Permitting	X		Permit #1343-02
New Source Performance Standards (NSPS)		X	NA
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	NA
Major New Source Review (NSR)		X	NA
Risk Management Plan Required (RMP)		X	NA
Acid Rain Title IV		X	NA
State Implementation Plan (SIP)	X		General SIP
Compliance Assurance Monitoring Plan		X	NA

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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 emissions units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the 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 original application submitted by Plum Creek Manufacturing, LP (Plum Creek), on July 10, 1995, additional information provided in a response letter dated September 12, 1996, the Title V permit renewal application submitted on February 19, 2002, and the Title V permit renewal application submitted on November 16, 2007.

B. Facility Location

Plum Creek owns and operates the Ksanka sawmill facility. The source is classified as a sawmill and planing mill as defined under Standard Industrial Classification (SIC) 2421.

The Ksanka sawmill is located in Lincoln County, Fortine, Montana. The sawmill is just southeast of the town of Fortine and is located within four different sections: SE¼ of the SE¼ of Section 25, Township 35 North, Range 26 West; NE¼ of the NE¼ of Section 36, Township 35 North, Range 26 West; SW¼ of the SW¼ of Section 30, Township 35 North, Range 25 West; and Section 31, Township 35 North, Range 26 West.

C. Facility Background Information

Montana Air Quality Permit (MAQP) Background

An air quality MAQP #63-100169 was issued for a modified tepee burner on July 14, 1969; the tepee burner was removed from the site 10 years prior to revocation of the permit on August 10, 1996. Permit #1343 was issued for the hog fuel boiler on September 5, 1979.

During the review of the operating permit application, it was discovered that Plum Creek should have applied to alter its permit to construct EU04 Lumber Drying Kilns in 1979. A letter was sent to Plum Creek on August 5, 1996, requiring Plum Creek to submit a permit application. On September 12, 1996, Plum Creek agreed to submit a preconstruction permit application for the sources in question. On September 28, 1996, a letter was sent to Plum Creek stating that the permit application must be received by November 15, 1996. Permit #1343-01 was issued on January 3, 1997, for the existing sources at the facility including the drying kilns. A schedule of compliance was originally included in the permit but was removed prior to issuing the proposed Operating Permit #OP1343-00 because Plum Creek had achieved compliance with the Administrative Rules of Montana (ARM) 17.8.701, *et seq*.

Plum Creek submitted a permit modification request on November 9, 1999, for several changes at the Plum Creek – Ksanka facility. Because the potential emissions from the new equipment (blower and cyclone) will be less than 15 tons per year, Plum Creek added the equipment to the facility under the de minimis rule (ARM 17.8.705(r)). Permit #1343-02 was issued on December 24, 1999, and replaced Permit #1343-01.

The air quality classification for the area is "Better than National Standards" or "Unclassifiable" for all pollutants (40 CFR 81.327) except particulate matter with an aerodynamic diameter of less than 10 micron (PM_{10}). Part of Lincoln County is currently classified as a PM_{10} nonattainment area; however, this facility is not located in the nonattainment area nor does the facility contribute to it. This designation means that Prevention of Significant Deterioration (PSD) rules potentially apply. The Ksanka mill site is located within 50 kilometers of Glacier National Park, which is designated as a Class I area.

Operating Permit Background

On August 14, 1997, Plum Creek was issued final and effective **Operating Permit #OP1343-00**. The operating permit expired on August 14, 2002.

On February 19, 2002, the Department of Environmental Quality (Department) received an application from Plum Creek for an operating permit renewal. The application was deemed administratively complete on February 19, 2002, and technically complete on April 9, 2002.

After review of the application for permit renewal and in accordance with current Department protocol for Title V operating permit requirements, the Department determined that several emitting units included in Operating Permit #OP1343-00 as significant emitting units are insignificant emitting units subject to only generally applicable requirements, as currently defined under the Title V operating permit program. Therefore, the following significant emitting units, as cited in Operating Permit #OP1343-00, were placed on the insignificant emitting unit list for Operating Permit renewal #OP1343-01.

- EU7 (Operating Permit #OP1343-01) - Sawdust Target Box;
- EU8 (Operating Permit #OP1343-01) - Chipper Cyclone;
- EU9 (Operating Permit #OP1343-01) - Planer Chipper Cyclone;
- EU14 (Operating Permit #OP1343-01) - 1000 Gallon Gasoline Tank; and
- EU15 (Operating Permit #OP1343-01) - 2000 Gallon Diesel Tank

Further, the Planer Shavings Hog Fuel Cyclone (EU3 – Operating Permit #OP1343-00), the Sawdust Hog Fuel Cyclone (EU10 – Operating Permit #OP1343-00), and the Chipper Hog Fuel Cyclone (EU11 – Operating Permit #OP1343-00) were removed from the facility and replaced by the Hog Fuel Cyclone (EU06 – Operating Permit #OP1343-01) with an air flow capacity of 5000 scfm. The Hog Fuel Cyclone was installed for the purpose of controlling emissions from hog fuel processes at the mill. In addition, the Edger Chip Cyclone, indicated in the application for Operating Permit renewal #OP1343-01, was added to the insignificant emitting unit list. **Operating Permit #OP1343-01** replaced Operating Permit #OP1343-00.

D. Current Permit Action

On November 16, 2007, The Department received an application for a renewal of the Plum Creek Ksanka Title V Operating Permit #OP1343-01. There were no changes to the facility since the last permitting action. The Department updated rule references and permit language to reflect current rule references and language. **Operating Permit #OP1343-02** replaces Operating Permit #OP1343-01.

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, 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 February 6, 2008.

F. Compliance Designation

The facility was last inspected on November 28, 2007 and was found to be in compliance with all Department regulations and permit conditions. There have been no citations since the last Title V Permit renewal.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The primary operation at the facility is the production of stud grade lumber from raw logs. The process of cutting the logs into lumber includes debarking, sawing, chipping, kiln drying, planing, and packaging for shipping. The byproducts of lumber manufacturing are sawdust, wood chips, planer shavings, and hog fuel. These byproducts may be burned in the hog fuel boiler or stored in bins until the material is sold and transferred off-site. The hog fuel boiler is used to provide steam to dry rough green lumber in the drying kilns.

The process begins when raw logs are brought from the log storage area and are fed into the debarker where the bark is removed. The peeled logs are cut to length by block saws located outside the sawmill building. The blocked logs enter the sawmill where they are cut to dimension. Green dimension lumber from the sawmill is conveyed to the sorter stacker area. Stacked green lumber is stored in the green inventory until it is dried in the dry kilns. Dried lumber from the dry kilns enters dry rough inventory and is later planed in the planer building. Planed lumber is conveyed into the finished inventory area where it is stored until the lumber is sold.

During the processing of raw logs to dimensional lumber, there are four main types of by-products or residuals produced. Three of the by-products are in a green or wet condition. These by-products include bark, sawdust, and wood chips. The fourth by-product is wood shavings. Shavings are planed from the lumber after it has been dried in the dry kilns.

Bark from the debarker is conveyed to a bark hog where it is shredded. Shredded bark is conveyed from the hog to the hog fuel pile. Sawdust and chips from the sawmill are conveyed to the sawdust screens where large pieces are screened off and conveyed to the chipper. Sawdust is transported via a pneumatic conveyor from the screen to a junction. The junction can send the sawdust to the sawdust target box on the sawdust truck bin for sales or to the sawdust hog fuel cyclone for use as fuel in the boiler. Sawdust is typically sent to the truck bin unless it is full or otherwise unable to accept the sawdust.

Chips from the chipper are conveyed via a belt to the chip screens. Fines are diverted back to the sawdust screens where they enter the sawdust handling system. Chips from the chip screen are transported via a pneumatic conveyor from the screen to a junction. The junction can send the chips to the chipper cyclone on the chip truck bin for sales or to the hog fuel cyclone for use as fuel in the boiler.

Planer ends are conveyed from the planer building to the planer chipper. Chips from the planer chipper are also transported via a pneumatic conveyor to a junction. From the chips screen, the junction can send the chips to the planer chipper cyclone or directly to the chipper cyclone on the chip truck bin for sales.

Planer shavings are transported via a pneumatic conveyor from the planer to a junction. The junction can send the shavings to the planer shavings cyclone on the planer shavings truck bin for sales or to the hog fuel cyclone for fuel. Shavings are typically sent to the truck bin unless it is full or otherwise unable to accept the shavings.

Sawdust, chips, and shavings from the respective hog fuel cyclones are deposited on a conveyor, which takes the material to the hog fuel silo. Hogged bark from the hog fuel pile is also conveyed to the hog fuel silo and from the silo to the hog fuel boiler.

The hog fuel is used to provide steam to dry rough green lumber in the dry kilns. Bark from the log debarking process is the main fuel for the boiler. The boiler emits particulate matter (PM), sulfur dioxide (SO_2), oxides of nitrogen (NO_x), carbon monoxide (CO), volatile organic compounds (VOCs), lead (Pb) and a number of hazardous air pollutants (HAPs) associated with wood combustion.

B. Emission Units and Pollution Control Device Identifications

The emission units, devices, activities, and pollution control devices at the facility are identified below.

EU01 Hog Fuel Boiler

The Dutch oven hog fuel boiler with multiclone emission controls was installed in 1979. Bark from the log debarking process is the main fuel for the boiler. Steam generated in the boiler is presently used in the kilns to dry lumber. The boiler produces a maximum of 20,000 pounds of steam per hour at 250 pounds per square inch (psi). It consists of a Wellons fuel cell with a Nebraska Type A boiler package. A mutliclone installed downstream from the boiler controls the particulate emissions.

EU02 Planer Shavings Bin Cyclone

This cyclone accepts shavings from the planer and delivers them to the truck bin. The cyclone was field erected in 1982 and has a flow rate of 37,256 standard cubic foot per minute (scfm). The average process weight of shavings listed in the initial permit application (July 10, 1995) was 35,000 tons per year (TPY).

EU03 Lumber Drying Kilns

The sawed lumber is placed in one of two kilns and is dried before being planed. The kilns are made by Wellons and were installed in 1979. Both kilns have 108-foot double tracks. The average process rate listed in the initial permit application (July 10, 1995) was 110,000 million board feet per year (MMbdft/yr).

EU04 Fugitive Emissions: Raw Materials Handling

These fugitive emissions result from activities such as shavings handling, sawdust handling, chips handling, boiler hog fuel handling, and the hog fuel pile. The information provided in the permit application indicated that these sources would be insignificant - based on the emission factors and control efficiency applied in the permit application (July 10, 1995). However, the calculations in the permit application were performed incorrectly; the wrong emission factor was used for the hog fuel pile and hog fuel handling. If the correct emission factors had been used the calculated emissions would have been 23.33 TPY for PM_{10}, a significant source.

The Department decided to group all raw material handling as one emissions source and use standard emission factors and control efficiencies for raw materials handling for consistency in determining what constitutes an insignificant source for the wood products industry. Based on the Department's calculations, raw material handling for this facility is a significant source.

EU05 Fugitive Emissions: Vehicle Traffic:

These fugitive emissions result from driving vehicles on both paved and unpaved roads/areas. In accordance with (ARM 17.8.308(2)), Plum Creek shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter. While these requirements are generally applicable to the Plum Creek source as a whole, fugitive emissions from plant vehicle traffic has the potential to emit greater than 5 TPY of total particulate matter and are thus considered a significant source of emissions as defined in the Title V operating permit program.

EU06 Hog Fuel Cyclone

Emissions from the Hog Fuel Cyclone are subject to a 20% opacity limit in accordance with ARM 17.8.308 and the process weight rule contained in ARM 17.8.310. While these requirements are generally applicable to the Plum Creek source as a whole, the Hog Fuel Cyclone has the potential to emit greater than 5 TPY of total particulate matter and is thus considered a significant source of emissions as defined in the Title V operating permit program. The Hog Fuel Cyclone is rated at 5000 scfm and has taken the place of the previously permitted (Operating Permit #OP1343-00) Planer Shavings Hog Fuel Cyclone (EU3), Sawdust Hog Fuel Cyclone (EU10), and the Chipper Hog Fuel Cyclone (EU11) for the purpose of controlling emissions from the hog fuel processes at the mill.

EU07 Sawmill and Planer Processes

The sawmill and planer processes consist of debarking, sawing, and planing. The larger pieces of wood waste are chipped while the remaining material is sent to the appropriate cyclone or hog fuel belt for burning in the boiler. The saws and planer are located indoors. The sawmill and planer processes are subject to process weight and opacity rules. While these requirements are generally applicable to the Plum Creek source as a whole, sawmill and planer processes have the potential to emit greater than 5 TPY of total particulate matter and are thus considered a significant source of emissions as defined in the Title V operating permit program. Compliance monitoring for the sawmill and planer processes is required by the Department on an as needed basis.

EU08 Fugitive Emissions: Plant-Wide Fuel Combustion

The plant-wide fuel combustion includes fugitive emissions from the combustion of gasoline and diesel sources and sawmill vehicles. The sulfur in fuel rule is the only applicable requirement for plant-wide fuel combustion because motor vehicles are excluded from the opacity rule under ARM 17.8.304(4). While this requirement is generally applicable to the Plum Creek source as a whole, the fugitive emissions from plant wide fuel combustion has the potential to emit greater than 5 TPY of NOx and CO and is thus considered a significant source of emissions as defined in the Title V operating permit program. Compliance with the sulfur in fuel rule can be demonstrated by burning gasoline and diesel fuel from petroleum distributors, which meets the sulfur in fuel requirements. Compliance monitoring for fugitive emissions resulting from plant-wide fuel combustion is required by the Department on an as needed basis.

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

There are no emission limits or standards identified in this permit that were not previously applicable to the facility. All of the emission limits are listed in the operating permit along with the applicable rule citation for each limit.

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 does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does 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 monitor 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 evaluate compliance, but the Department has the authority to require testing if deemed necessary to evaluate compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to confirm its compliance status.

In the past, there were no requirements to perform testing on the hog fuel boiler. However, the operating permit requires a Method 5 test to be performed every 5 years to monitor compliance with the particulate standard of 13.9 pounds per hour (lb/hr) and 0.462 pounds per million British thermal units (lb/MMBtu). The potential uncontrolled PM_{10} emissions from the boiler are 118.6 tons/yr while the preconstruction permit limit is 60.9 TPY. The carbon monoxide potential has been calculated at 248.2 TPY but testing is not required because the hog fuel boiler does not have a CO limit. Therefore, the permit only requires particulate testing every 5 years to demonstrate compliance with the particulate standard of 13.9 lb/hr.

Although Method 9 is the method identified by ARM 17.8.101(27) to determine compliance for opacity, the Department included visual surveys for EU04 - Fugitive Emissions: Raw Materials Handling and EU05 - Fugitive Emissions: Vehicle Traffic as a monitoring method to indicate and certify compliance with ARM 17.8.308. The visual surveys require the facility to look at fugitive

particulate emissions on a weekly basis and if necessary take corrective actions. The Department believes that performing weekly visual surveys may provide a greater benefit than performing semiannual Method 9 tests. Not only may costs for compliance be reduced but the weekly visual surveys may increase the facility's awareness of fugitive emissions. However, by performing the visual surveys the underlying requirement is not jeopardized because the Department may require a Method 9 at any time pursuant to ARM 17.8.105. In addition, the facility may elect to perform the Method 9 tests in lieu of the visual surveys.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least 5 years following the date of the generation of the record.

E. Reporting Requirements

The reporting requirements are included in the permit for each emissions unit. Section V "General Conditions" of the operating permit further explains the reporting requirements. The permittee is required to submit semiannual 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 *Kalispell Daily Interlake* newspaper on or before January 28, 2009. The Department provided a 30-day public comment period on the draft operating permit from January 28, 2009, to February 27, 2009. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by February 27, 2009 will be summarized, along with the Department's responses, in a table in this technical review document. All comments received during the public comment period will be promptly forwarded to Plum Creek so they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Identity of Commenter	Comment	Department Response
1. Section V.E. Prompt Deviation Reporting	What is the definition of "probable cause" in this type of situation? Is the desired information the probable "causation" of the event, or statement that "probable cause" exists that a deviation "may" have resulted? Is this term used in its legal sense? What is the appropriate written response when no probable causation of the event is determined within the time frames specified in Section V.E?	As described in ARM 17.8.1212(3)(c), deviations from permit requirements must be promptly reported to the Department, including the cause of such deviations, and any corrective actions or preventative measures taken. As such, the Department must be supplied with information regarding the likely cause of the deviation, not a statement that there is probable cause that a deviation may have resulted. If the permittee is unable to determine the probable cause of a deviation within the timeframes specified, the permittee is expected to work with the Department to review the measures being taken in order to determine the probable cause of the deviation and the corrective measures that are being implemented.

2. Section V.E. Prompt Deviation Reporting	It is not clear what is meant by "deviations which may result in emissions potentially in violation of permit limitations." Does this include all permit conditions, only emission limitations, or something other? How does a deviation differ from a "violation" or "non-compliance" as discussed in Section V.A.1 of the draft permit? Does this imply that a written report is required for each discovered event, each "near" event, and each "maybe" event?	"Deviations which may result in emissions potentially in violation of permit limitations" refers to emissions of air pollutants that are suspected to exceed specific emission limitations. So, as a general rule, these exceedances are violations (or suspected violations), and must be reported to the Department as deviations within 24 hours of their discovery. However, there are some limited exceptions to this general rule involving periods of excess emissions that are specifically not considered violations of a permit condition. For example, the pulp and paper mill MACT requires facilities to maintain a closed-vent HAP collection system and to report any venting from the system as excess emissions. This MACT standard specifically states that excess emissions are not violations unless they exceed 4% of the source operating time. Therefore, depending on the situation, deviations attributable to excess emissions may or may not violate permit limitations and therefore would have different reporting timeframes under the requirements of Section V.E. of the permit. As a general rule, deviations are violations of, or non-compliance with, permit conditions. As discussed above, there are some unique exceptions to this rule. All deviations, however, are required to be reported to the Department within the timeframes specified in Section V.E. For deviations that are not subject to the malfunction rule and would not result in emissions that would potentially violate permit limitations, the permittee is required to report the deviations via a written, faxed, or electronic report within 90 days of discovery. It is highly recommended that each facility discuss their specific rule and permit requirements with their assigned Department Compliance Inspector to define appropriate prompt deviation reporting practices.
3. Section V.E. Prompt Deviation Reporting	Deviations area to be considered "…including those attributable to upset conditions as defined in the permit…" Does this imply that "upset conditions" are defined individually by the Department for each facility that must meet the Prompt Deviation Reporting rule? Such definition does not seem to be included in draft permit #OP1343-02.	The referenced language is specifically stated in ARM 17.8.1212(3)(c). "Upset conditions" are typically understood to have the plain English meaning. The Department has the ability, however, to define these conditions more explicitly in the permit, if necessary.

4. Section V.E. Prompt Deviation Reporting	Does this requirement mean that all incidents currently reported as excess emission events, CAM excursions, and annual certification deviations that are included in regularly scheduled reports will now require a notification within 24 hours and a detailed written report within 30 days?	No. As discussed above, only those deviations that result in emissions that potentially violate permit limitations are required to be reported as specified in V.E.1.
5. Section V.E. Prompt Deviation Reporting	If the emitting unit uses periodic emission testing to demonstrate compliance, how would one know if the "deviation" or "upset condition" results in a potential violation of permit conditions? For example, under this definition, how does one treat a short period of elevated opacity when there is not a certified Method 9 person available to estimate the opacity?	The language in Section V.E. requires prompt deviation reporting to occur within the specific timeframes in relation to **discovery**. It is expected that these periods of discovery will occur during the permittee's routine internal review, which is not expected to change as a result of this prompt deviation reporting language. It is important to recognize, however, that the use of credible evidence is not precluded.
6. Section V.E. Prompt Deviation Reporting	Is it appropriate to define "potential violations" for separate categories of events;; for example, a) exceedance of emissions limits when emissions are continuously monitored, b) possible deviations from a permit condition that addresses opacity or fugitive emissions, c) the situation where there is no emission limitation exceedance and no malfunction, yet some condition of the permit (possibly the date for a report submittal) is not met, or d) during normal startup and shutdown events?	The Department believes that the existing language is adequate to delineate between separate categories of events.

G. Draft Permit Comments

Summary of Permittee Comments

Permit Location	Permittee Comment	Department Response
No Comments		

H. EPA Comments:

Summary of EPA Comments

Permit Location	EPA Comment	Department Response
No Comments		

SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

Plum Creek requested a permit shield from all requirements that were identified as non-applicable in its permit application. Section IV of the operating permit "Non-Applicable Requirements" contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that Plum Creek identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Requirements Not Included in the Operating Permit

Applicable Requirement	Reason for Not Including
40 CFR 51.119 Intermittent control systems 40 CFR 51.165 Permit requirements 40 CFR 51.166 Prevention of significant deterioration of air quality 40 CFR 51.300 - 307 Protection of visibility 40 CFR 51, Appendix P Minimum emission monitoring requirements 40 CFR 51, Appendix S Emission offset interpretative ruling 40 CFR 52.21 Prevention of significant deterioration 40 CFR 52.22 (b) Maintenance of national standards - regulation for review of new or modified indirect sources 40 CFR 52.24 Statutory restriction on new sources 40 CFR 52.29 Visibility long-term strategies 40 CFR 53 and 58 Ambient air quality surveillance Quality assurance requirements for PSD air monitoring 40 CFR 62 Approval and promulgation of state plans for designated facilities and pollutants 40 CFR 70 and 71 State operating permit programs and EPA regulations on federal operating permit programs	Because these rules contain requirements for regulatory authorities and not major sources, these rules can be used to impose specific requirements on a major source. Consequently, Plum Creek will not be shielded from these regulations.
40 CFR 6,1, Subpart M National Emission Standards for Hazardous Air Pollutants - Asbestos	This is a federal regulation that has specific procedural requirements that may become relevant to the major source during the permit term.
40 CFR 60, Subpart A - General Provisions 40 CFR 61, Subpart A - General Provisions 40 CFR 63, Subpart A - General Provisions	These federal regulations consist of an applicability statement. These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit.
ARM 17.8.901 Definitions ARM 17.8.902 Incorporation by Reference ARM 17.8.1001 Definitions ARM 17.8.1101 Definitions ARM 17.8.1102 Incorporation by Reference ARM 17.8.1103 Applicability --Visibility Requirements ARM 17.8.1107 Visibility Models	These rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.825 Sources Impacting Federal Class I Areas -- Additional Requirements ARM 17.8.826 Public Participation ARM 17.8.1108 Notification of Permit Application ARM 17.8.1109 Adverse Impact and Federal Land Manager	These rules do not have specific requirements for major sources. They are requirements for EPA or state and local authorities and may be used as authority to impose specific requirements on a major source.

Applicable Requirement	Reason for Not Including
ARM 17.8.322 Sulfur Oxide Emissions - Sulfur in Fuel	This facility burns both liquid and solid fuel at the facility. Therefore, this rule is applicable to the facility.
ARM 17.8.324(1)&(3) Hydrocarbon Emissions -- Petroleum Products	This facility has gasoline storage tanks in excess of 250 gallons.
ARM 17.8.701 *et seq.* Permit, construction and operation of air contaminant sources ARM 17.8.504 Air Quality Permit Application Fees ARM 17.8.514 Air Quality Open Burning Fees ARM 17.8.612 Conditional Air Quality Open Burning Permits ARM 17.8.611 Emergency Open Burning Permits ARM 17.8.326 Prohibited Materials for Wood or Coal Residential Stoves ARM 17.8.904 When Air Quality Preconstruction Permit Required ARM 17.8.905 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.906 Baseline for Determining Credit for Emissions and Air Quality Offsets ARM 17.8.1004 When Air Quality Preconstruction Permit Required ARM 17.8.1005 Additional Conditions of Air Quality Preconstruction Permit ARM 17.8.1006 Review of Specified Sources for Air Quality Impact ARM 17.8.1007 Baseline for Determining Credit for Emissions and Air Quality Offsets	These regulations may not be applicable to the source at this time, however, these regulations may become applicable during the life of the permit. Therefore, facility-wide permit shields will not be granted for these rules.
MCA 75-2-101 *et. seq*. Title policy, definitions, powers etc. of the Montana Clean Air Act MCA 75-2-201(1) Classifying and reporting air contaminant sources MCA 75-2-202 *et. seq*. Setting of ambient air quality standards, emission levels, permits, public hearings, sulfur dioxide, variances, operating permits, fees, medical waste incineration, disclosure and permit denial MCA 75-2-401 *et. seq*. Enforcement, appeals and penalties MCA 75-2-101 Title, policy definitions, powers etc. of the Montana Clean Air Act MCA 75-2-501 *et. seq*. Asbestos Control	As with the federal regulations, shields will not be granted for regulations that do not have specific requirements for major sources. These regulations are requirements for the state and local authorities. Plum Creek will not be shielded from these regulations.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

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

B. Risk Management Plans

As of the date of permit issuance, 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; 3 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.

C. NESHAPS Standards

The only NESHAP standard that may apply to this facility as of the date of permit issuance, is 40 CFR 61, Subpart M, "National Emission Standards for Hazardous Air Pollutants for Demolition and Renovation"; this standard is applicable to any asbestos project. The Department is unaware of any future requirement that may be promulgated during the permit term for which this facility must comply.

D. NSPS Standards

As of the date of permit issuance, the Department is unaware of any future NSPS requirement that may be promulgated that would affect this facility. Currently, the only NSPS requirement that the facility may be subject to is Subpart Dc, "Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units." However, this subpart is not applicable to this facility because the hog fuel boiler (EU01) was installed prior to June 9, 1989.