

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT**

**Permitting and Compliance Division
1520 East Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901**

**Devon Energy Production Company, L.P.
Blaine County #1 Compressor Station
N½ of Section 29, Township 31 North, Range 18 East in Blaine County, MT
P.O. Box 2606
Havre, MT 59501**

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		Semi-annual
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		MAQP #1626-07
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)	X		40 CFR 63, Subpart A and Subpart HHH
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
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 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 Ocean Energy, Inc., Havre Pipeline Company, LLC (HPC), on May 30, 1996, the significant modification application submitted on May 9, 2003, the renewal application submitted on August 20, 2003, and the administrative amendment requests submitted by Devon-Louisiana Corporation on August 23, 2004, and by Devon Energy Production Company, L.P. (Devon) on March 13, 2006 and February 2, 2007.

B. Facility Location

Devon owns and operates the Blaine County #1 Compressor Station. The facility is located at the N½ of Section 29, Township 31 North, Range 18 East in Blaine County, Montana. The site is located approximately 22 miles southwest of Havre, Montana, and 15 miles northeast of the Rocky Boy Indian Reservation.

C. Facility Background Information

Montana Air Quality Permit Background

On March 10, 1972, Northern Natural Gas was issued Permit **#411-060772** for the construction and operation of a glycol dehydration unit located in Section 29, Township 31 North, Range 18 East in Blaine County, Montana.

On October 26, 1981, Northern Natural Gas was issued Permit **#1626** for the operation of an existing natural gas compressor station located in Section 25, Township 27 North, Range 18 East in Blaine County, Montana.

Effective January 1, 1992, pursuant to Administrative Rules of Montana (ARM) 16.8.1903, the Department of Health and Environmental Sciences (now the Department of Environmental Quality (Department)) began assessing annual air quality operation fees for all sources holding or required to hold an air quality permit. In assessing bills to Northern Natural Gas, it was brought to the Department's attention that Northern Natural Gas operated three natural gas compressor stations in Montana, but held four air quality permits. It was determined that Permit #411-060772 and Permit #1626 were for separate equipment at the same site. Permit **#1626-01** was issued on February 7, 1993, to consolidate the two permits and to properly identify the permitted equipment and the facility location. Permit #1626-01 replaced Permit #411-060772 and Permit #1626.

HPC acquired the Blaine County #1 Compressor Station from the Northern Natural Gas Company on September 30, 1995. On August 4, 1996, Permit **#1626-02** was issued to HPC. This permit acknowledged the change of ownership of the Blaine County #1 compressor station and included the installation and operation of an additional three 1,140-Horsepower (Hp) Caterpillar G3516 TALE natural gas compressor engines. Other insignificant emitting units, including scrubbers, headers, meters, and coolers, also were installed during this project. Permit #1626-02 replaced Permit #1626-01.

On July 23, 1998, the Department received a request to modify Permit #1626-02. HPC requested the Department to remove the VOC testing requirements for the three 1,140-Hp Caterpillar G3516 TALE compressor engines and to correct the source numbering within the permit. The Department previously determined VOC testing was not necessary; however, the limit remained in case testing may be required in the future. The permit was modified consistent with actions taken at other compressor stations. Rule references were also updated. Permit #1626-03 replaced Permit #1626-02.

On May 7, 1999, the Department received notification that UMC Petroleum Corp had merged with Ocean Energy, Inc. The Havre Pipeline Co., LLC, Blaine County #1 compressor station now operates as a subsidiary of Ocean Energy, Inc. On June 27, 1999, Permit #1626-04 replaced Permit #1626-03.

In 1999, the EPA notified the Department that any condition in a Montana Air Quality Permit would be considered a federally enforceable condition. However, there were certain state rules that were never intended to be federally enforceable. The Department notified all facilities holding Montana Air Quality Permits that they could request deletion of the conditions based on ARM 17.8.717 and 17.8.315. Removing these conditions did not relieve the facility from complying with the rule upon which the permit condition was based; removal only ensured that enforcement of the conditions remained with the Department. The modification removed the condition based on ARM 17.8.315 from HPC's permit. Permit #1626-05 replaced Permit #1626-04.

On August 23, 2004, the Department received a request to change the corporate name on Permit #1626-05 from Havre Pipeline Company, LLC (HPC) to Devon-Louisiana Corporation. The Department changed the corporate name on Permit #1626-05 from HPC to Devon-Louisiana Corporation, and updated the permit to reflect current permit language and rule references used by the Department. Permit #1626-06 replaced Permit #1626-05.

On March 13, 2006, the Department received a request to change the corporate name on Permit #1626-06 from Devon-Louisiana Corporation to Devon Energy Production Company, L.P. (Devon). The administrative amendment changed the corporate name on Permit #1626-07 as requested. Permit #1626-07 replaced Permit #1626-06.

Title V Operating Permit Background

On May 30, 1996, the Department received an operating permit application for the Blaine County #1 Compressor Station. The permit application was deemed administratively complete on June 30, 1996, and the permit application was deemed technically complete on July 30, 1996. Permit #OP1626-00 became final and effective on January 1, 1999.

On May 9, 2003, the Department received a Title V Operating Permit Significant Modification Application (OP1626-01) from Bison Engineering, Inc. (Bison), on behalf of HPC. The application was deemed administratively complete on May 10, 2003, and technically complete on July 9, 2003.

HPC requested that the Department modify Permit #OP1626-00 to reflect the fact that the Blaine County #1 Compressor Station is subject to 40 Code of Federal Regulations (CFR) 63, Subpart A and Subpart HHH because the facility is a major source of Hazardous Air Pollutants (HAPs). As a result, conditions were added to EU006 (TEG Dehydration Still Vent) requiring HPC to comply with all applicable standards, limitations, reporting, recordkeeping, and notification requirements contained in 40 CFR 63, Subpart A and Subpart HHH. In addition, EU006 was changed from TEG Dehydration Still Vent to ALCO Dehydration Unit and PAMCO Dehydration Unit because the facility now utilizes two dehydration units.

Further, the name on the permit was updated from UMC Petroleum Corporation, Havre Pipeline Company, to Ocean Energy, Inc., Havre Pipeline Company, LLC. The name change was incorporated into Montana Air Quality Permit #1626-04 but was never incorporated into the operating permit. The mailing address was also updated to reflect the current mailing address. Finally, the permit format, language, and rule references were updated to reflect the Department's current permit format, language, and rule references.

The draft Permit #**OP1626-01** was issued on September 4, 2003; however, HPC submitted a Title V renewal application on August 20, 2003. In order to expedite the permitting process, the Department decided not to proceed with issuing the proposed Permit #OP1626-01 and to issue a "re-drafted" Permit #**OP1626-02** to include the changes requested in the significant modification application, as well as the renewal application.

The renewal application addressed the applicability of the Compliance Assurance Monitoring (CAM) rule. The Department reviewed the CAM applicability analysis provided by HPC and the Department agrees that the CAM rule does not apply to the Blaine County #1 Facility because none of the emitting units meet the criteria for CAM applicability. Permit #OP1626-02 replaced Permit #1626-00 and draft Permit #OP1626-01.

On December 30, 2004, the Department issued Permit #**OP1626-03** to Devon. The administrative amendment changed the corporate name on Permit #OP1626-02 from Ocean Energy, Inc./Havre Pipeline Company, LLC, to Devon. Permit #OP1626-03 replaced Permit #OP1626-02.

On October 11, 2006, the Department issued Permit #**OP1626-04** to Devon. The administrative amendment changed the corporate name on Permit #OP1626-03 from Devon-Louisiana Corporation to Devon Energy Production Company, L.P. Permit #OP1626-04 replaced Permit #OP1626-03.

D. Current Permit Action

On February 2, 2007, Devon requested to administratively amend the permit to change the responsible official. **Permit #OP1626-05** replaces Permit #OP1626-04.

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 28, 2006.

F. Compliance Designation

The Devon Blaine County #1 Compressor Station was last inspected on April 18, 2006. During the inspection, the Devon Blaine County #1 Compressor Station was in compliance with both applicable air quality permits (Montana Air Quality Permit #1626-07 and Title V Operating Permit #OP1626-03). The Department reviewed records and reports for the facility since the previous inspection on November 20, 2006, and no problems or violations were found. The records and reports reviewed included but were not limited to: the Title V Compliance Certification; Semi-annual Monitoring Reports; 40 CFR 63, Subpart HH and Subpart HHH applicability analysis; stack tests; malfunction reports; and emission inventories. The April 18, 2006, inspection and corresponding records review completes a full compliance evaluation for the Devon Blaine County #1 Compressor Station through May 31, 2006.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The Devon Blaine County #1 Compressor Station is a compressor station designed to boost the gas pressure for transportation to markets. It provides this compression as a service to the gas producers in the area. Devon never acquires ownership of the gas it compresses. The field gas is initially compressed in the booster compressors and fed into the primary compressors. Once compressed, the gas is dehydrated in two Triethylene Glycol dehydration units. The compressor station has additional emission sources that correspond to auxiliary equipment and fugitives. These sources are space heaters, a stand-by generator, and tanks.

B. Emission Units and Pollution Control Device Identification

The emission units regulated by Permit #OP1626-05 and the pollution control device utilized by each emission unit are summarized in the following table:

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	5,500- Hp Ingersoll Rand KVR 616 Compressor Engine	None
EU002	5,500-Hp Ingersoll Rand KVR 616 Compressor Engine	None
EU003	1,140-Hp Caterpillar G3516 TALE Compressor Engine	Low emission package/lean-burn engine and electronic AFR controller
EU004	1,140-Hp Caterpillar G3516 TALE Compressor Engine	Low emission package/lean-burn engine and electronic AFR controller
EU005	1,140-Hp Caterpillar G3516 TALE Compressor Engine	Low emission package/lean-burn engine and electronic AFR controller
EU006	60 MMScfd ALCO Dehydration Unit and 50 MMScfd PAMCO Dehydration Unit	None
EU007	297-Hp Waukesha L16166 Emergency Generator	None

C. Categorically Insignificant Sources/Activities

ARM 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any HAP, and is not regulated by any applicable requirement other than a generally applicable requirement. A list of insignificant emitting units at the Devon facility is summarized in the following table.

Emissions Unit ID	Description
IEU01	(2) Natural Gas Fired Heating Boilers (2.93 MMBtu/hr)
IEU02	(3) Natural Gas Fired Space Heaters (0.16 MMBtu/hr)
IEU03	Natural Gas Fired ALCO Dehydrator Reboiler (0.60 MMBtu/hr)
IEU04	Natural Gas Fired PAMCO Dehydrator Reboiler (0.75 MMBtu/hr)
IEU05	Natural Gas Fired TEG Tank Heater (0.12 MMBtu/hr)
IEU06	Natural Gas Fired Waste Oil Tank Heater (0.10 MMBtu/hr)
IEU07	Natural Gas Fired Building/Ht Tracing Boiler (1.0 MMBtu/hr)
IEU08	Natural Gas Fired Heater Treater (1.0 MMBtu/hr)
IEU09	2,000-Gallon Gasoline Storage Tank
IEU10	2,000-Gallon Methanol Storage Tank
IEU11	6,000-Gallon Methanol Storage Tank
IEU12	500-Gallon Diesel Storage Tank
IEU13	On-Site Vehicle Traffic
IEU14	Miscellaneous Fugitive VOC Emissions

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Each of the two 5,500-Hp Ingersoll-Rand Compressor Engines (EU001 and EU002) does not have associated emissions limits. However emissions from each engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. In addition, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. Further, the stack heights of EU001 and EU002 are required to be a minimum of 45 feet above ground level.

Each of the three 1,140-Hp Caterpillar Compressor Engines (EU003, EU004, and EU005) is limited to 3.02 pounds per hour (lb/hr) for NO_x, 4.78 lb/hr for CO, and 1.78 lb/hr for VOC. The emission limits are based on Best Available Control Technology (BACT) determinations that were established by the Department. Emissions from each engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. In addition, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. Further, the stack heights of EU003, EU004, and EU005 are required to be a minimum of 20 feet above ground level.

Emissions from the ALCO dehydration unit and the PAMCO dehydration unit (EU006) are limited to 20% opacity. In addition, the dehydration units are subject to all applicable standards, limitations, reporting, recordkeeping, and notification requirements contained in 40 CFR Part 63, Subpart A and Subpart HHH.

The 297-Hp Waukesha Emergency Generator (EU007) does not have associated emission limits. However, EU007 may only be operated when commercially supplied electrical power is not available or during periods of planned maintenance. EU007 may not be operated as part of the routine operations of the facility. In addition, emissions from the emergency generator are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026*H^{-0.233}$. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

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 an 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

The current permit action is considered an administrative amendment; therefore, a public notice was not required.

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Devon 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 Devon identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Applicable Requirement	Reason Not Included in Permit
<p>40 CFR 50.4 National Primary Ambient Air Quality Standards for Sulfur Oxides 40 CFR 50.5 National Secondary Ambient Air Quality Standards for Sulfur Oxides 40 CFR 50.6 National Primary and Secondary Ambient Air Quality Standards for PM₁₀ 40 CFR 50.7 National Primary and Secondary Ambient Air Quality Standards for PM_{2.5} 40 CFR 50.8 National Primary Ambient Air Quality Standards for Carbon Monoxide 40 CFR 50.9 and 50.10 National Primary and Secondary Ambient Air Quality Standards for Ozone 40 CFR 50.11 National Primary and Secondary Ambient Air Quality Standards for Nitrogen Dioxide 40 CFR 50.12 National Primary and Secondary Ambient Air Quality Standards for Lead 40 CFR 50, Appendices A-K 40 CFR 51.100 Definitions 40 CFR 51.101-105 Stipulations, public hearing, submission of plans, revisions and plan approval 40 CFR 51.118 Stack Height Provisions 40 CFR 51.119 Intermittent Control Systems 40 CFR 51.120 SIP Plan Revisions – Motor Vehicles 40 CFR 51.160-163 Legally Enforceable Procedures, public availability of information, identification of responsible agency and administrative procedures 40 CFR 51.164 Stack Height Procedures 40 CFR 51.165 Permit Requirements 40 CFR 51.166 Prevention of Significant Deterioration of Air Quality 40 CFR 51.190-285 Ambient Air Quality Surveillance, source surveillance, legal authority, intergovernmental consultation, compliance schedules and miscellaneous plant content requirements 40 CFR 51.300-307 Protection of Visibility 40 CFR 51.308-309 Regional haze program requirements and requirements related to the Grand Canyon Visibility Transport Commission. 40 CFR 51.320-860 Reports, extensions, I/M program requirements, conformity, economic incentive programs and determining conformity of general federal actions to SIP or FIP. 40 CFR 51 Appendices A-C 40 CFR 51 Appendices L-M 40 CFR 51 Appendix P 40 CFR 51 Appendix S 40 CFR 51 Appendices V-X 40 CFR 53, 54, 56, 58, and 59 40 CFR 71 40 CFR 81 ARM 17.8.130 NOV--Order to take corrective action ARM 17.8.142 Rehearing Procedures--Board Review ARM 17.8.510 Annual Review ARM 17.8.1210-1215 Requirements for Air Quality Operating Permit ARM 17.8.1222, 1223, and 1225 General and Temporary Air Quality Operating Permits and Additional Requirements for Air Quality Operating Permit Amendments ARM 17.8.1228 Requirements for revocation, reopening, and revision for cause ARM 17.8.1231 Notice of Termination, Modification, or Revocation and Re-issuance by the Administrator for Cause ARM 17.8.1232 Public Participation ARM 17.8.1233 Review by Administrator and Affected States ARM 17.8.1301 <i>et seq.</i> Conformity ARM 17.8.1401 <i>et seq.</i> Conformity of General Federal Actions</p>	<p>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, Devon will not be shielded from these regulations.</p>

<p>40 CFR 52.21 Prevention of Significant Deterioration 40 CFR 52.23 Violation and Enforcement 40 CFR 52.24 Statutory Restriction on New Sources 40 CFR 52.26-29 Visibility monitoring strategy, protection of visibility for sources in attainment and non-attainment areas, and visibility long-term strategies 40 CFR 52.30-34 Sanctions, mandatory sanctions, compliance certifications, and section 126 petitions 40 CFR 52.50-2920 and Appendices D, E, and F 40 CFR 62 40 CFR 70</p>	<p>Because these rules do not have specific requirements but are always relevant to a major source, these rules are never listed in the non-applicable requirements and Devon will not be shielded from these regulations.</p>
<p>40 CFR 68 40 CFR 64 Compliance Assurance Monitoring ARM 17.8.120 <i>et seq.</i> Variance Procedures ARM 17.8.131 Enforcement Procedures—Appeal to Board ARM 17.8.140-141 Rehearing Procedures – Form and Filing of Petition and Filing Requirements ARM 17.8.511 Fee Appeal Procedure ARM 17.8.514 Air Quality Open Burning Fees ARM 17.8.605 –606 Special Burning Periods and Minor Open Burning ARM 17.8.611-615 Open burning for emergency, conditional, Christmas tree waste, commercial film production, and firefighter training ARM 17.8.1224 Additional Requirements for Operational Flexibility and Air Quality Operating Permit Changes that do not Require Revisions ARM 17.8.1226 Additional Requirements for Minor Air Quality Operating Permit Modifications ARM 17.8.1227 Additional Requirements for Significant Air Quality Operating Permit Modifications ARM 17.8.1501 Compliance Assurance Monitoring</p>	<p>Because these are procedural rules that have specific requirements that may become relevant a major source during the permit term, Devon will not be shielded from these requirements.</p>
<p>ARM 17.8.101-104 Definitions, Incorporation by Reference and Reserved ARM 17.8.301 and 302 Definitions and Incorporation by Reference ARM 17.8.330 Emission Standards for Existing Aluminum Plants ARM 17.8.401 <i>et seq.</i> Stack Heights and Dispersion Techniques ARM 17.8.501 Definitions ARM 17.8.601 and 602 Definitions and Incorporation by Reference ARM 17.8.740 <i>et seq.</i> Permit, Construction and Operation of Air Contaminant Sources\ ARM 17.8.801 <i>et seq.</i> Prevention of Significant Deterioration of Air Quality ARM 17.8.901 <i>et seq.</i> Permit Requirements for Major Stationary Sources or Major Modifications Located Within Non-attainment Areas ARM 17.8.1001 <i>et seq.</i> Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Located Within an Attainment or Unclassified Area ARM 17.8.1101 <i>et seq.</i> Visibility Impact Analysis ARM 17.8.1201-1203 Definitions, incorporation by reference, and program overview ARM 17.8.1234 Acid Rain Permits</p>	<p>Because these rules consist of either a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference and do not have specific requirements associated with them, Devon will not be shielded from these rules.</p>
<p>ARM 17.8.326 Prohibited Materials for Wood or Coal Residential Stoves</p>	<p>Because these are rules that are always applicable to a major source and may contain specific requirements for compliance, Devon will not be shielded from these rules.</p>

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT/NESHAP Standards

National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (40 CFR 63, Subpart HH) and National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities (40 CFR 63, Subpart HHH) were promulgated June 17, 1999. As of the issuance date of Permit #OP1626-05, Subpart HHH applies to the Blaine County #1 Facility. Subpart HH does not apply to the Blaine County #1 Compressor Station because the facility is considered a natural gas transmission and storage facility, not a natural gas production facility.

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (40 CFR Part 63, Subpart ZZZZ) applies to the Blaine County #1 Compressor Station because the facility has been determined to be a major source of HAPs. However, according to the rule, MACT for existing lean-burn engines is no control; therefore, the two 5,500-Hp Ingersoll-Rand (lean-burn) engines and the three 1,140-Hp Caterpillar (lean-burn) engines are not subject to any specific requirement. The 297-Hp Waukesha Generator Engine is a rich-burn engine; however, according to the rule, the engine is not an affected unit because the maximum rated design capacity of the engine is less than 500-Hp.

National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) applies to the Blaine County #1 Compressor Station because the facility has been determined to be a major source of HAPs. However, according to the rule, boilers and/or process heaters that burn gaseous fuel do not have applicable emission limits; therefore, Devon is not required to conduct stack tests or meet a specific emission standard because the boilers/process heaters at the Blaine County #1 Compressor Station burn natural gas.

B. NSPS Standards

As of the issuance date of Permit #OP1626-05, the Department is unaware of any future NSPS Standards that may be promulgated that will affect the Blaine County #1 Compressor Station.

C. Risk Management Plan

As of the issuance date of Permit #OP1626-05, 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.