

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

**Permitting and Compliance Division
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Bitter Creek Pipelines, LLC
Symons Central Compressor Station
P.O. Box 131
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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		Semiannual
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 #3250-01
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	
Major New Source Review (NSR)		X	
Prevention of Significant Deterioration (PSD)		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
Compliance Assurance Monitoring (CAM)		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 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 Bitter Creek Pipelines, LLC (BCPL) on April 4, 2003, and an additional submittal on May 6, 2003.

B. Facility Location

BCPL owns and operates the Symons Central Compressor Station located approximately 3 miles southeast of Decker, Montana, in Sections 34 and 35, Township 9 South, Range 40 East, in Big Horn County, Montana.

C. Facility Background Information

Montana Air Quality Permit

On April 4, 2003, BCPL submitted, concurrently, an application for a Montana Air Quality Permit and a Title V Operating Permit for the Symons Central Compressor Station. The Montana Air Quality Permit Application was deemed complete on May 9, 2003, upon the submittal of additional information by BCPL. Montana Air Quality Permit #3250-00 was issued final on July 16, 2003.

On December 5, 2003, BCPL requested an administrative amendment to Montana Air Quality Permit #3250-00. BCPL requested to add a 0.75 million British thermal units per hour (MMBtu/hr) Cimarron 3 coil evaporator unit. The unit was added to the permit according to the provisions of ARM 17.8.745. Montana Air Quality Permit #3250-01 was issued final on January 8, 2004.

Title V Operating Permit

On April 4, 2003, BCPL submitted, concurrently, an application for a Montana Air Quality Permit and a Title V Operating Permit for the Symons Central Compressor Station. The Title V Operating Permit Application was deemed administratively complete on April 5, 2003, and technically complete on May 9, 2003, upon the submittal of additional information by BCPL. The Cimarron 3 coil evaporator unit that was added to the permit analysis of Montana Air Quality Permit #3250-01 was added to the insignificant emitting unit list contained in Appendix A of the Proposed version of the Title V Operating Permit OP3250-00. In addition, alternate operating scenarios were added to Sections III.B and III.C to allow BCPL to replace engines according to the provisions of ARM 17.8.745 and ARM 17.8.1215.

D. 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 of Environmental Quality (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 July 18, 2003.

E. Compliance Designation

The Department has not yet inspected the facility for compliance with Montana Air Quality Permit #3250-00. However, the two 1,680-Hp Waukesha Compressor Engines that have been installed at the Symons Central Compressor Station were scheduled to be initially tested for NO_x and CO approximately January 26, 2004.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The BCPL Symons Central Compressor Station Facility is a coal bed methane, natural gas central compressor station. Coal bed methane is a natural hydrocarbon gas, primarily methane that occurs in beds of coal. Production field facilities withdraw the methane from the coal beds and send the methane to the Symons Central Compressor Station Facility to be dehydrated and compressed for transmission through the natural gas pipeline. The two glycol dehydration units are used to remove moisture from the gas and the eight compressor engines are used to boost pipeline pressure for transmitting the natural gas through the pipeline. The Symons Central Compressor Station Facility is not a production field facility; the station simply dehydrates and compresses natural gas that is received from surrounding production field facilities.

B. Emission Units and Pollution Control Device Identification

The emission units regulated by Permit OP3250-00 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	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU002	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU003	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU004	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU005	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU006	1,680-Hp Waukesha 7044GSI Compressor Engine	NSCR Unit and AFR Controller
EU007	840-Hp or less natural gas Compressor Engine	NSCR Unit and AFR Controller
EU008	840-Hp or less natural gas Compressor Engine	NSCR Unit and AFR Controller

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana (ARM) 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated air pollutant, has the potential to emit less than 500 pounds per year of lead or any Hazardous Air Pollutant (HAP), and is not regulated by any applicable requirement other than a generally applicable requirement. The list of insignificant emitting units at the BCPL Symons Central Compressor Station are summarized in the following table:

Emissions Unit ID	Description
IEU01	1 MMBtu/hr Dehydration Unit #1
IEU02	1 MMBtu/hr Dehydration Unit #2
IEU03	(8) 50-Gallon Engine Jacket Water (EG/water) Tanks
IEU04	(8) 500-Gallon Ethylene Glycol (EG/water makeup) Tanks
IEU05	(8) 120-Gallon Compressor Crankcase Oil Tanks
IEU06	(8) 230-Gallon Engine Crankcase Oil Tanks
IEU07	(8) 350-Gallon Compressor Lubricator Oil Tanks
IEU08	(8) 500-Gallon Waste Oil Tanks
IEU10	(2) 1000-Gallon Triethylene Glycol Tanks
IEU11	(1) 400-Barrel Produced Water Tank
IEU12	(1) 400-Barrel Water/Oil Mix Holding Tank
IEU13	(1) 400-Barrel (Processed) Water Tank
IEU14	(1) 500,000 Btu/hr Produced Water Tank Heater
IEU15	(1) 500,000 Btu/hr Water/Oil Mix Holding Tank Heater
IEU16	(1) 500,000 Btu/hr (Processed) Water Tank Heater
IEU17	(1) 0.75 MM Btu/hr Cimarron 3 Coil Evaporator Unit

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Each of the six 1,680-Horsepower (Hp) Waukesha Compressor Engines (EU001, EU002, EU003, EU004, EU005, and EU006) is limited to 3.70 pounds per hour (lb/hr) for NO_x, 7.41 lb/hr for CO, and 1.85 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 required to be controlled by a non-selective catalytic reduction (NSCR) unit and an air to fuel ratio (AFR) controller. In addition, emissions from each of the engines are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E=1.026 \cdot H^{0.233}$. Further, 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.

Each of the two compressor engines equal to, or less than 840-Hp (EU007 and EU008), is required to comply with the limits calculated as follows: NO_x limit (lb/hr) = 1.0 g/bhp-hr * bhp * 0.002205 lb/g; CO limit (lb/hr) = 2.0 g/bhp-hr * bhp * 0.002205 lb/g; and, VOC limit (lb/hr) = 1.0 g/bhp-hr * bhp * 0.002205 lb/g. The emission limits are based on BACT determinations that were established by the Department. Emissions from each engine are required to be controlled by a NSCR unit and an AFR controller. In addition, 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 $E=1.026 \cdot H^{0.233}$. Further, 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.

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 determine compliance with the emission limits and standards.

C. Test Methods and Procedures

Montana Air Quality Permit #3250-00 requires BCPL to test each of the six 1,680-Hp Waukesha Compressor Engines and each of the two compressor engines equal to, or less than 800-Hp, for NO_x and CO, concurrently, to demonstrate compliance with the emission limitations in the permit. The

permit requires that the tests be performed according to the EPA methods in Appendix A of 40 CFR 60. Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit may be demonstrated by burning pipeline quality natural gas (as defined by BCPL's long-haul pipeline contracts) on an ongoing basis.

Title V Operating Permit OP3250-00 contains requirements for semiannual testing with a portable analyzer for each of the six 1,680-Hp Waukesha Compressor Engines and each of the two compressor engines equal to, or less than 800-Hp. In addition, Permit OP3250 requires a testing with a portable analyzer for each engine that is replaced according to the provisions of ARM 17.8.745 and ARM 17.8.1215. The permit stipulates that the portable analyzer shall be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A or shall be capable of meeting the requirements of EPA Conditional Test Method 022 for the "Determination of Nitric Oxide, Nitrogen Dioxide and NO_x from Stationary Sources by Electrochemical Analyzer." BCPL may use another testing procedure as approved in advance by the Department. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). BCPL will then convert the NO_x and CO emissions test results from a "ppm" value to a "lb/hr" number. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to monitor compliance with the emissions limitations in the permit.

The Department will use the portable analyzer testing results as a direct measure of compliance. 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 BCPL may elect to voluntarily conduct compliance testing to confirm its compliance status.

D. Recordkeeping Requirements

BCPL 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, BCPL 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 17.8.132, a public notice was published in the *Billings Gazette* newspaper on or before September 4, 2003. The Department provided a 30-day public comment period on the draft operating permit from September 4, 2003, to October 6, 2003. 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 October 6, 2003, are summarized, along with the Department's responses, in the following table.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
The Department did not receive any public comments.		

G. Draft Permit Comments (Permit OP3250-00)

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Facility name in the DEQ database.	BCPL requested that the facility be referred to as BCPL – Symmons Central Compressor Station in the Department’s database	The database information was submitted to the Department’s technical support section as BCPL – Symmons Central Compressor Station.
Title V Operating Permit Program	BCPL asked if they must accept Title V Operating Permit OP3250-00 because the facility does not yet have the physical capability of emitting more than 100 tons per year of any regulated pollutant because the entire facility has not yet been constructed.	BCPL was required to submit, concurrently, a Montana Air Quality Permit and a Title V Operating Permit application for the Symmons Central Compressor Station because the facility’s PTE NO _x and CO is greater than 100 TPY. Neither the Montana Air Quality Permit Program, nor the Title V Operating Permit Program is based on actual emissions emitted from a facility. In addition, ARM 17.8.762 requires a facility to begin construction within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall be revoked (Section III.H of Montana Air Quality Permit #3250-01).
Section I of Title V Operating Permit OP3250-00 – Primary SIC Code, Nature of Business, and Description of Process.	BCPL commented that the primary SIC code should be 13 instead of 1311, that the nature of the business should not be natural gas extraction and transmission because the facility is considered to be a production facility, and that the description of the process is wrong in stating that the facility is not a production field facility because the facility would be subject to 40 CFR 63, Subpart HH, not 40 CFR 63, Subpart HHH, if the facility were a major source of HAPs.	The Department reviewed the Standard Industrial Classification Manual (1987), as well as the Montana Air Quality Permit /Title V Operating Permit Application submitted by Aspen Consulting and Engineering, on behalf of BCPL, and the Department believes that the SIC Code, the nature of the business, and the description of the process is correct. Therefore, they remain unchanged in the permit. The Department believes that BCPL is concerned about which MACT standard would be applicable to the facility if the facility were to become a major source of HAPs. The SIC code and process description contained in the permit are not the determining factors when deciding if the facility is subject to either MACT standard. The criteria for being subject to the MACTs is contained in 40 CFR 63, subparts HH and HHH and the applicability criteria is summarized in Section II.C.8 of the permit analysis of the facility’s current Montana Air Quality Permit.

<p>Sections III.B and III.C. of Title V Operating Permit OP3250-00.</p>	<p>1) BCPL requested that the Department explain BCPL’s ability to replace an existing engine at the Symmons Central Compressor Station pursuant to both the Montana Air Quality Permit #3250-01 and the Title V Operating Permit #3250-00.</p> <p>2) BCPL requested that the Department explain BCPL’s ability to replace an existing engine at the Symmons Central Compressor Station that experiences catastrophic failure, pursuant to both the Montana Air Quality Permit #3250-01 and the Title V Operating Permit #3250-00.</p>	<p>1) Emission reductions from the six 1,680-Hp Waukesha compressor engines, as well as the two compressor engines equal to, or less than, 840-Hp, were made federally enforceable in the Montana Air Quality Permit by limiting BCPL to operating 6 1,680-Hp Waukesha Compressor Engines and 2 compressor engines equal to, or less than, 840-Hp. Therefore, BCPL can replace the engines in accordance with ARM 17.8.745 because the change would not increase the facility’s PTE that was evaluated while writing the Montana Air Quality Permit. The notification requirement of ARM 17.8.745 has been incorporated into the Title V Operating Permit as an alternative-operating scenario (ARM 17.8.1215).</p> <p>2) Same Response as above (1).</p>
<p>Sections III.B.8 and III.C.8 of Title V Operating Permit OP3250-00.</p>	<p>BCPL commented that BCPL does not have a FERC gas tariff. BCPL stated that BCPL is subject to having its injection points to other companies long-haul pipelines shut in if BCPL attempts to inject “out of specification” natural gas into the long haul pipeline.</p>	<p>The conditions were changed to define pipeline quality natural gas as “as defined by BCPL’s long-haul pipeline contracts.</p>
<p>Sections III.B.9 and III.C.9 of Title V Operating Permit OP3250-00.</p>	<p>1) BCPL requested that the Department acknowledge that the initial compliance source test conducted pursuant to the Montana Air Quality Permit would be regarded as the first required semiannual test, required by the Title V Operating Permit.</p> <p>2) BCPL also commented that reference method testing equipment may be used in lieu of a portable analyzer.</p>	<p>1) The initial compliance source test required by the Montana Air Quality Permit can be accepted as the first required semiannual test that would be required by the Title V Operating Permit. This is an issue to be discussed with the Department’s compliance officer for the facility if BCPL cannot meet a scheduled testing date.</p> <p>2) The conditions remain unchanged because Sections III.B.9 and III.C.9 contain language that BCPL may use another testing procedure as approved in advance by the Department.</p>

	3) BCPL stated that BCPL will not be notifying the Department of scheduled semiannual stack test dates and that stack gas flow rates will not be physically determined during each test.	3) ARM 17.8.106 states that all emission source testing must be performed as specified in the Montana Source Test Protocol and Procedures Manual, unless alternate equivalent requirements are determined by the Department and the source to be appropriate, and prior written approval has been obtained from the Department. The Montana Source Test Protocol and Procedures Manual requires a source test protocol to be reviewed and approved by the Department prior to testing. BCPL should contact the Department's compliance officer for the Symons Central compressor station if BCPL wishes to utilize alternate equivalent requirements.
Sections III.B.13 and III.C.13 of Title V Operating Permit 3250-00	BCPL commented that a portable analyzer may not be used and that information on the reference method test equipment will be noted on records.	This information would be submitted as part of the source test protocol that is required to be submitted by the Montana Source Test Protocol and Procedures Manual. The protocol will be reviewed and either approved or denied by the Department. The conditions remain unchanged.
Sections III.B.15 and III.C.15 of Title V Operating Permit OP3250-00.	BCPL commented that the Montana Source Test Protocol and Procedures Manual will not be followed to determine compliance during semiannual testing. BCPL also commented that no protocol will be submitted and notification will not be made. BCPL stated that the Department may contact BCPL at any time if the Department wishes to observe any testing and a schedule could then be proposed and later confirmed prior to the tests.	ARM 17.8.106 states that all emission source testing must be performed as specified in the Montana Source Test Protocol and Procedures Manual, unless alternate equivalent requirements are determined by the Department and the source to be appropriate, and prior written approval has been obtained from the Department. The Montana Source Test Protocol and Procedures Manual requires a source test protocol to be reviewed and approved by the Department prior to testing. BCPL would be out of compliance with their permit if they do not follow the Montana Source Test Protocol and Procedures Manual. If BCPL wishes to utilize alternate equivalent requirements, BCPL should contact the Department's compliance officer for the Symons Central compressor station. The conditions in the permit remain unchanged.

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
	The EPA reviewed the Draft Permit and did not have any comments	

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

BCPL requested a permit shield from all Requirements that were identified as non-applicable in its permit application. Section IV of Permit OP3250-00 “Non-Applicable Requirements” contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that BCPL 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
ARM 17.8.204 - Ambient Air Monitoring ARM 17.8.206 – Methods and Data ARM 17.8.223 – Ambient Air Quality Standard for PM ₁₀	Because these rules are always applicable to a major source and they may contain specific requirements for compliance, BCPL will not be shielded from these regulations.
ARM 17.8.801 <i>et seq.</i> – Prevention of Significant Deterioration of Air Quality ARM 17.8.1101 <i>et seq.</i> – Visibility Impact Assessment	Because these rules are either (1) rules that do not have specific requirements for major sources because they are requirements for EPA or state and local authorities and should never be shielded, (2) procedural rules that have specific requirements that may become relevant to BCPL during the permit term or (3) these rules are rules that consist of either a statement of purpose, applicability statement, regulatory definitions, or a statement of incorporation by reference, BCPL will not be shielded from these rules.
ARM 17.8.901 <i>et seq.</i> – Permit Requirements for Major Stationary Sources or Major Modifications Locating Within Nonattainment Areas ARM 17.8.1001 <i>et seq.</i> – Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Locating Within Attainment or Unclassified Areas	Because these rules are either (1) procedural rules that have specific requirements that may become relevant to BCPL during the permit term or (2) these rules are rules that consist of either a statement of purpose, applicability statement, regulatory definitions, or a statement of incorporation by reference, BCPL will not be shielded from these rules.
40 CFR Part 63, Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities	Because 40 CFR Part 63, Subpart HHH is a federal regulation that could become relevant to BCPL during the permit term, BCPL will not be shielded from this regulation.

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 Part 63, Subpart HH) and National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities (40 CFR Part 63, Subpart HHH) were promulgated June 17, 1999. As of the issuance date of Permit OP3250-00, Subpart HHH does not apply to the Symons Central Compressor Station because the facility is not a major source of HAPs. Subpart HH does not apply to the Symons Central Compressor Station because the facility is not a major source of HAPs and 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) was proposed by the EPA on December 19, 2002. The estimated promulgation date for Subpart ZZZZ is August 16, 2004. Subpart ZZZZ, as proposed, would not apply to the Symons Central Compressor Station because the facility is not a major source of HAPs.

National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters (40 CFR Part 63, Subpart DDDDD) was proposed by the EPA on January 13, 2003. The estimated promulgation date for Subpart DDDDD is February 28, 2004. Subpart DDDDD, as proposed, would not apply to the Symons Central Compressor Station because the facility is not a major source of HAPs.

B. NSPS Standards

As of the proposed date of Permit #3250-00, the Department is unaware of any future NSPS Standards that may be promulgated that will affect the Symons Central Compressor Station.

C. Risk Management Plan

As of the proposed date of Permit OP3250-00, 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.