



Steve Bullock, Governor
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March 10, 2014

Ross Whelchel
NorthWestern Energy
40 East Broadway Street
Butte, MT 59601

Dear Mr. Whelchel:

Montana Air Quality Permit #1626-09 is deemed final as of March 1, 2014, by the Department of Environmental Quality (Department). This permit is for a natural gas compressor station. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

A handwritten signature in black ink that reads "Julie A. Merkel".

Julie A. Merkel
Air Permitting Supervisor
Air Resources Management Bureau
(406) 444-3626

A handwritten signature in black ink that reads "Deanne Fischer".

Deanne Fischer, P.E.
Environmental Engineer
Air Resources Management Bureau
(406) 444-3403

JM:DF
Enclosure

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #1626-09

Havre Pipeline Company, LLC,
a Texas limited liability company
Blaine County #1 Compressor Station
c/o 40 E. Broadway
Butte, MT 59701

March 1, 2014



MONTANA AIR QUALITY PERMIT

Issued To: Havre Pipeline Company, LLC,
a Texas limited liability company
Blaine County #1 Compressor Station
c/o 40 E. Broadway
Butte, MT 59701

MAQP: #1626-09
Administrative Amendment (AA) Request
Received: 01/16/2014
Department's Decision on AA: 02/13/2014
MAQP Final: 03/01/2014
AFS #: 005-0001

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Havre Pipeline Company, LLC, a Texas limited liability company, hereinafter referred to as "HPC", pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

HPC owns and operates a natural gas compressor station located approximately 22 miles southeast of Havre, Montana, in the NW¼ of Section 29, Township 31 North, Range 18 East in Blaine County, Montana. The facility is known as the Blaine County #1 Compressor Station.

B. Current Permit Action

On January 16, 2014, Montana Department of Environmental Quality – Air Resources Management Bureau (Department) received correspondence from Devon Energy Production Company, L.P. (Devon) as notification of a transfer of ownership from Devon to HPC. The current permit action reflects this change in company name as well as updates the MAQP to reflect current Department format, rule and references, and language.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. Each 1,140 bhp Caterpillar G3516 TALE natural gas compressor engine shall be equipped with a "low-emissions" package and shall operate as a lean-burn engine. Also, each engine shall be equipped with an electronic air-to-fuel ratio (AFR) controller. The speed on each engine shall not exceed 1,400 revolutions per minute (rpm) of continuous duty operation. Each engine shall have a minimum stack height of 20 feet above ground level and emissions from each engine shall not exceed the following limits (ARM 17.8.749):

Oxides of Nitrogen (NO _x ¹) =	3.02 pound per hour (lb/hr)
Carbon Monoxide (CO) =	4.78 lb/hr
Volatile Organic Compounds (VOC) =	1.78 lb/hr

¹ NO_x reported as NO₂.

2. Each 5,500 bhp Ingersoll Rand KVR 616 natural gas compressor engine shall have a minimum stack height of 45 feet above ground level in order to comply with the Montana Ambient Air Quality Standard for nitrogen dioxide (NO₂) (ARM 17.8.749).
3. HPC shall extend the existing fence line at the site to enclose the 26-acre area that was specified in the ambient air modeling submitted the previous application (MAQP #1626-08) in order to comply with the Montana Ambient Air Quality Standard for NO₂. This fence shall be constructed in a manner adequate to restrict the general public from the premises and HPC shall post "No Trespassing" signs in a manner adequate to deter access by the general public (ARM 17.8.211 and ARM 17.8.749).
4. HPC shall operate the 297 bhp Waukesha L1616 emergency engine/generator, only when commercially supplied electrical power is not available or during periods of planned maintenance. HPC shall not operate this engine/generator more than 500 hours per rolling 12-month time period. HPC shall not operate this engine/generator as a part of routine operations (ARM 17.8.749).
5. HPC shall not operate the 770 bhp Cummins GTA28 natural gas emergency/standby engine/generator more than 500 hours per rolling 12-month time period. HPC shall not operate this engine/generator as a part of routine operations (ARM 17.8.749).
6. HPC shall operate all equipment to provide the maximum air pollution control for which it was designed (ARM 17.8.749).
7. HPC shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
8. HPC 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 (ARM 17.8.308).
9. HPC shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.8 (ARM 17.8.749).
10. HPC shall comply with all applicable standards and limitations, and the reporting, record keeping, and notification requirements contained in 40 Code of Federal Regulations (CFR) 63, Subpart HH, *National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities*, for all applicable components. For area sources, this includes each TEG dehydration unit at subject facilities (ARM 17.8.342 and 40 CFR 63, Subpart HH).
11. HPC shall comply with all applicable standards and limitations, and the reporting, record keeping, and notification requirements contained in 40 CFR 60, Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable natural gas engine (ARM 17.8.340 and 40 CFR 60, Subpart JJJJ and ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Testing Requirements

1. Each compressor engine shall be initially tested for NO_x and CO (the pollutants to be tested concurrently). The initial source testing shall be conducted within 180 days of the initial start-up date of the compressor engine(s). After the initial source test, additional testing shall continue on an every 4-year basis, or according to another testing/monitoring schedule as may be approved by the Department, to demonstrate compliance with NO_x and CO lb/hr emission limits as calculated in Section II.A.1 (ARM 17.8.105 and ARM 17.8.749).
2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. HPC shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505). HPC shall submit the following information annually to the Department by March 1 of each year; the information may be submitted along with the annual emission inventory (ARM 17.8.505).

- a. Amount of fuel consumed by each natural gas compressor engine (corrected to 14.7 pounds per square inch absolute (psia) and 60⁰ Fahrenheit (F));
- b. Hours of operation for each natural gas compressor engine;
- c. Estimated amount of fuel consumed by each 2.93 million British thermal units per hour (MMBtu/hr) natural gas fired boiler (corrected to 14.7 psia and 60⁰ F);
- d. Estimated amount of fuel consumed by each 0.16 MMBtu/hr natural gas fired space heater (corrected to 14.7 psia and 60⁰ F);
- e. Estimated amount of fuel consumed by the 0.60 MMBtu/hr dehydrator reboiler, the 0.75 MMBtu/hr dehydrator reboiler, the 0.12 MMBtu/hr dehydrator tank, the 0.10 MMBtu/hr oil tank heater, the 1.0 MMBtu/hr building/heat tracing boiler, and the 1.0 MMBtu/hr heater treater heater (corrected to 14.7 psia and 60⁰ F);
- f. Hours of operation for the dehydration units;

- g. Estimated amount of fuel consumed by the 297 bhp Waukesha L1616 emergency engine/generator and the 770 bhp Cummins GTA28 emergency/standby engine/generator (corrected to 14.7 psia and 60⁰ F);
 - h. Hours of operation for the 297 bhp Waukesha L1616 emergency engine/generator and the 770 bhp Cummins GTA28 emergency/standby engine/generator.
 - i. Summary report listing the reasons the 297 bhp Waukesha L1616 emergency engine/generator or the 770 bhp Cummins GTA28 emergency/standby engine/generator was operating.
2. HPC shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include ***the addition of a new emissions unit***, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
 3. All records compiled in accordance with this permit must be maintained by HPC as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).
 4. HPC shall document, by month, the hours of operation for the 297 bhp Waukesha L1616 emergency engine/generator and the hours of operation for the 770 bhp Cummins GTA28 natural gas emergency/standby engine/generator. By the 25th day of each month, HPC shall total the hours of operation for the previous month for the units listed above. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.4 and II.A.5. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).

SECTION III: General Conditions

- A. Inspection – HPC shall allow the Department’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emission Monitoring System (CEMS), Compliance Emission Rate Monitoring System (CERMS)) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if HPC fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving HPC of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).

- D. Enforcement – Violations of limitations, conditions, and requirements contained herein may constitute grounds for permit revocation, penalties, or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department’s decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department’s decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department’s decision on the application is final 16 days after the Department’s decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by the Department at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by HPC may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis
Havre Pipeline Company, LLC, a Texas limited liability company
Blaine County #1 Compressor Station
MAQP #1626-09

I. Introduction/Process Description

Havre Pipeline Company, LLC, a Texas limited liability company (HPC) owns and operates the Blaine County #1 Compressor Station. This facility is a natural gas compressor station located in the NW¼ of Section 29, Township 31 North, Range 18 East in Blaine County, Montana.

A. Permitted Equipment

The facility consists of the following equipment:

- Two 5,500 brake-horsepower (bhp) Ingersoll Rand KVR 616 natural gas compressor engines;
- Three 1,140 bhp Caterpillar G3516 TALE natural gas compressor engines;
- One 297 bhp Waukesha L1616 emergency engine/generator;
- One 770 bhp Cummins GTA28 emergency/standby engine/generator (2001);
- Two natural gas-fired boilers (2.93 million British thermal units per hour (MMBtu/hr each));
- Three natural gas-fired space heaters (0.16 MMBtu/hr each);
- One natural gas-fired ALCO Dehydrator Reboiler (0.6 MMBtu/hr);
- One natural gas-fired PAMCO Dehydrator Reboiler (0.75 MMBtu/hr);
- Two Triethylene Glycol (TEG) dehydrators (ALCO and PAMCO) with uncontrolled still vent(s);
- One natural gas-fired TEG tank heater (0.12 MMBtu/hr);
- One natural gas-fired waste oil tank heater (0.10 MMBtu/hr);
- One natural gas-fired heater treater (1.0 MMBtu/hr); and

Miscellaneous fugitive Volatile Organic Compounds (VOC) sources such as: storage tanks for methanol (2000 gallon and 6000 gallon), gasoline (2000 gallon), diesel (500 gallon), antifreeze, TEG and lube oil, scrubbers, headers, meters, and other insignificant emitting units.

B. Source Description

The Blaine County #1 Compressor Station utilizes the five compressor engines to gather, compress, and transmit natural gas through a natural gas pipeline. The facility is located approximately 22 miles southeast of Havre and 18 miles northeast of the Rocky Boy Indian Reservation. The site has restricted access and HPC personnel routinely monitor the facility.

C. Permit History

On March 10, 1972, a Montana Air Quality Permit (MAQP) was issued to Northern Natural Gas to construct and operate a glycol dehydration unit, located in Section 29, Township 31 North, Range 18 East, of Blaine County near Havre, Montana. The application was given **Permit #411-060772**.

On October 26, 1981, **Montana Air Quality Permit (MAQP) #1626** was issued to Northern Natural Gas to operate an existing natural gas compressor station, located in Section 25, Township 27 North, Range 18 East, of Blaine County near Havre, Montana.

Effective January 1, 1992, pursuant to the Administrative Rules of Montana (ARM) 16.8.1903, the Air Quality Bureau 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 of Environmental Quality's (Department) attention that Northern Natural Gas operated three (3) natural gas compressor stations in Montana, but held four air quality permits. It was determined that Permit #411-060772 and MAQP #1626 were for separate equipment at the same site. **MAQP #1626-01** was issued on February 7, 1993, to consolidate the two permits and to properly identify the permitted equipment and the facility location.

Havre Pipeline Company, LLC (HPC), acquired the Blaine County #1 Compressor Station from the Northern Natural Gas Company on September 30, 1995. On August 4, 1996, **MAQP #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 bhp Caterpillar G3516 TALE natural gas compressor engines. Other insignificant emitting units, including scrubbers, headers, meters, and coolers, were also installed during this project.

On July 23, 1998, the Department received a request to modify MAQP #1626-02. The request was to remove the VOC testing requirements for the three 1,140 bhp 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 would be required in the future. This permit was modified consistent with actions taken at other compressor stations. Rule references were also updated. **MAQP #1626-03** replaced MAQP #1626-02.

On May 7, 1999, the Department received notification that UMC Petroleum Corp had merged with Ocean Energy, Inc. The HPC, Blaine County #1 compressor station now operated as a subsidiary of Ocean Energy, Inc. On June 27, 1999, **MAQP #1626-04** replaced MAQP #1626-03.

In 1999, the U.S. Environmental Protection Agency (EPA) informed the Department that any condition in an air quality preconstruction permit would be considered a federally enforceable condition. However, there are certain state rules that were never intended to be federally enforceable. The Department notified all facilities holding preconstruction permits that they could request deletion of the conditions based on the ARM 17.8.717 and 17.8.315. Removing either of these conditions does not relieve the facility from complying with the rule upon which the permit condition was based; removal only ensures that enforcement of that condition remains with the Department. HPC requested that the Department remove the condition based on ARM 17.8.315 from HPC's permit. **MAQP #1626-05** replaced MAQP #1626-04.

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

On March 13, 2006, the Department received a request to change the corporate name on MAQP #1626-06 from Devon-Louisiana Corporation to Devon. The current permit action changes the corporate name on MAQP #1626-07 as requested. **MAQP #1626-07** replaced MAQP #1626-06.

On January 27, 2009, the Department received a request from Bison Engineering, Inc., on behalf of Devon, to modify MAQP #1626-07 to include the installation of a natural gas-fired four-stroke rich-burn emergency/standby engine/generator with a maximum rated design capacity equal to or less than 770 brake horsepower (bhp). On February 13, 2009, the Department received corrections to the submittal materials that included a corrected report, permit application forms, and emission inventory for the equipment list associated with the Blaine County #1 natural gas compressor station. In addition to adding the emergency/standby engine/generator to the permit, the permit action updated the permit to reflect current permit rule references, permit language, permit format and emission factors. **MAQP #1626-08** replaced MAQP #1626-07.

D. Current Permit Action

On January 16, 2014, the Department received correspondence from Devon as notification of a transfer of ownership from Devon to HPC. The current permit action reflects this change in company name as well as updates the MAQP to reflect current Department format, rule and references, and language. **MAQP #1626-09** replaces MAQP #1626-08.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the ARM and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

HPC shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standards for Ozone
6. ARM 17.8.214 Ambient Air Quality Standards for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standards for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standards for Visibility
9. ARM 17.8.222 Ambient Air Quality Standards for Lead
10. ARM 17.8.223 Ambient Air Quality Standards for PM₁₀
11. ARM 17.8.230 Fluoride in Forage

HPC must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, HPC 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.

3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. HPC will burn pipeline quality natural gas in the compressor engine(s), which will meet this limitation.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 Code of Federal Regulations (CFR) 60, Standards of Performance for New Stationary Sources (NSPS), including the following subparts:
 - a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
 - b. 40 CFR 60, Subpart KKK – Standards of Performance for Equipment Leaks of VOC From Onshore Natural Gas Processing Plants does not apply to the Blaine County #1 Compressor Station because the Blaine County #1 Compressor Station does not extract or fractionate natural gas liquids from field gas; therefore, the Blaine County #1 Compressor Station does not meet the definition of a natural gas processing plant as defined in 40 CFR 60, Subpart KKK.
 - c. 40 CFR 60, Subpart LLL – Standards of Performance for Onshore Natural Gas Processing: SO₂Emissions does not apply to the Blaine County #1 Compressor Station because the Blaine County #1 Compressor Station does not utilize a sweetening unit to process sour gas.
 - d. 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines contains NSPS requirements that apply to owners or operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction, modification, or reconstruction after June 12, 2006, where the stationary ICE is manufactured after July 1, 2007, for engines greater than 500 bhp, or after January 1, 2008, for engines less than 500 bhp. This NSPS will apply if the engine remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates three months or more each year.

Construction commenced on the existing natural gas SI ICE engines before June 12, 2006, and existing engines have not been modified or reconstructed after that date. The proposed emergency/standby engine/generator was manufactured in March 2001,

and has not been modified or reconstructed after that date. Since the natural gas SI ICE engines were manufactured before July 1, 2007, this NSPS does not currently apply. However, the NSPS could apply to future engines.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
 - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to an NESHAP Subpart as listed below:
 - b. 40 CFR 63, Subpart HH - National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities. Owners or operators of oil and natural gas production facilities, as defined and applied in 40 CFR Part 63, shall comply with the applicable provisions of 40 CFR Part 63, Subpart HH. In order for a natural gas production facility to be subject to 40 CFR Part 63, Subpart HH requirements, certain criteria must be met. First, a facility must either process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. Second, the facility must also contain an affected source as specified in paragraphs (b)(1) through (b)(4) of 40 CFR Part 63, Subpart HH. Finally, if the criteria are met, and the exemptions contained in paragraphs (e)(1) and (e)(2) of 40 CFR Part 63, Subpart HH do not apply, the facility is subject to the applicable provisions of 40 CFR Part 63, Subpart HH.

Based on the information submitted by the applicant, the Blaine County #1 Compressor Station facility is considered a major source of HAPs that is subject to 40 CFR 63, Subpart HH. A major source of HAP emissions is defined as any stationary source that has the potential to emit 10 tons per year (TPY) of any HAP or 25 TPY of any combination of HAPs. The Blaine County #1 Compressor Station has the potential to emit greater than 10 tons per year of formaldehyde. However, the sources are exempt from the standards listed in the subpart if the actual annual average natural gas flow rate is less than 85 thousand standard cubic per day (thousand m³/day) [3 million standard cubic feet per day (MMSCF/D)], and with benzene emissions equal to or less than 0.90 Megagrams per year (Mg/yr) [1.0 TPY] from either glycol dehydration unit. Because the glycol dehydration units emit less than 1.0 TPY of benzene, they are exempt from the control requirements listed in 40 CFR 63, Subpart HH. Records of the determinations applicable to this exemption must be maintained as required in 40 CFR 63.774(d)(1).

- c. 40 CFR 63, Subpart HHH National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities. Owners or operators of natural gas transmission or storage facilities, as defined and applied in 40 CFR 63, shall comply with the standards and provisions of 40 CFR 63, Subpart HHH. In order for a natural gas transmission and storage facility to be subject to 40 CFR 63, Subpart HHH requirements, certain criteria must be met. First, the facility must transport or store natural gas prior to the gas entering the pipeline to a local distribution company or to a final end user if there is no local distribution company. In addition, the facility must be a major source of HAPs as determined using the maximum natural gas throughput as calculated in either paragraphs (a)(1) and (a)(2) or paragraphs (a)(2) and (a)(3) of 40 CFR Part 63, Subpart HHH. Second, a facility must contain an affected source (glycol dehydration unit) as defined in paragraph (b) of 40 CFR Part

63, Subpart HHH. Finally, if the first two criteria are met, and the exemptions contained in paragraph (f) of 40 CFR 63, Subpart HHH, do not apply, the facility is subject to the applicable provisions of 40 CFR Part 63, Subpart HHH.

Based on information submitted by the applicant, the Blaine County #1 Compressor Station is subject to the provisions of 40 CFR 63, Subpart HHH. HAP emission calculations indicate that potential HAP emissions from the facility do not exceed the major source threshold of 25 TPY or more of any combination of HAPs; however, they do exceed the threshold of 10 TPY or more of any individual HAP. The highest single HAP is formaldehyde, which is greater than 10 TPY.

- d. 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). An affected engine is any existing, new, or reconstructed stationary RICE that remains or will remain at the permitted location for more than 12 months, or a shorter period of time for an engine located at a seasonal source. A seasonal source remains at a single location on a permanent basis (at least 2 years) and operates 3 months or more each year.

Since the existing natural gas RICE were installed before June 12, 2006, these engines are considered *existing* stationary RICE, and do not have the requirements under this Maximum Achievable Control Technology (MACT) as specified by 40 CFR 63.6590(b)(3). Since the proposed natural gas RICE was manufactured in March 2001, this emergency/standby engine/generator has limited applicability under Subpart ZZZZ. Title 40 CFR 63.6590(b)(1)(i) states that an emergency stationary RICE must meet the initial notification requirements of 40 CFR 63.6645(d). Within 120 days of installing the emergency/standby engine/generator, HPC must submit an initial notification detailing the information required in 40 CFR 63.9(b)(2)(i) through (v). MACT requirements could apply to future engines.

D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A permit fee is not required for the current permit action because the permit action is considered an administrative permit change.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:
1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
 2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 tons per year of any pollutant. HPC's Blaine County #1 Compressor Station has the potential to emit nitrogen oxides (NO_x), carbon monoxide (CO), and VOC at greater than 25 tons per year; therefore an air quality permit is required.
 3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
 4. ARM 17.8.745 Montana Air Quality Permits--Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
 5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. A permit application was not required for the current permit action because the permit change is considered an administrative permit change. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative permit change.
 6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
 7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving HPC of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.

11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.
 12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
 13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
 14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
 15. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer, including the names and authorized signatures of the transferor and the transferee, is sent to the Department.
- F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
 2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

The Blaine County #1 Compressor Station is not a listed facility. However, it does have the potential to emit greater than 250 TPY of any regulated pollutant (excluding fugitives); therefore, it is a major stationary source with respect to New Source Review (NSR)/Prevention of Significant Deterioration (PSD). This administrative amendment will not cause a net emission increase greater than significance levels and therefore, does not require PSD review.

G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:
 - a. PTE greater than 100 tons/year of any pollutant;
 - b. PTE greater than 10 tons/year of any one HAP, PTE greater than 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE greater than 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #1626-09 for HPC, the following conclusions were made:
 - a. The facility's PTE is greater than 100 tons/year for any pollutant (NO_x, VOC, CO).
 - b. The facility's PTE is greater than 10 tons/year for any one HAP (formaldehyde) and less than 25 tons/year for all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NSPS.
 - e. This facility is subject to current NESHAP standards (40 CFR 63, Subparts HH, HHH, and ZZZZ).
 - f. This source is not a Title IV affected source, nor a solid waste combustion unit.
 - g. This source is not an Environmental Protection Agency (EPA) designated Title V source.

Based on these facts, the Department determined that HPC is subject to the Title V operating permit program. HPC's Title V Operating Permit will be modified to reflect the conditions associated with this permit action.

III. BACT Determination

A BACT determination is required for each new or modified source. HPC shall install on the new or modified source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized. A BACT analysis was not required for the current permit action because the current permit action is considered an administrative permit action.

IV. Emission Inventory

Source	Ton/year					
	Description	PM ₁₀	NO _x	VOC	CO	SO _x
(2) 5,500 bhp Ingersoll Rand KVR 616 Engines (4-stroke, rich-burn)		3.0	1912.3	85.0	159.4	0.18
(3) 1,140 bhp Caterpillar G3516 TALE-1 Engines (4-stroke, lean-burn)		1.1	39.7	23.4	62.8	0.068
(1) 297 bhp Waukesha L1616 Emergency Engine (4-stroke, rich-burn) --Emergency engine limited to 500 hours/year		0.005	2.95	0.13	0.25	0.0003
(1) 770 bhp Cummins GTA28 (4-stroke, rich-burn) --Emergency/standby engine/generator limited to 500 hours/year		0.013	6.96	0.16	0.65	0.001
(1) Natural Gas-Fired PAMCO Dehydrator Boiler (0.75 MMBtu/hr)		0.025	0.33	0.018	0.276	0.002
(1) Natural Gas-Fired ALCO Dehydrator Boiler (0.60 MMBtu/hr)		0.020	0.26	0.014	0.22	0.002
(2) Dehydration Units -- (60 MMscf/day ALCO and 50 MMscf/day PAMCO)		---	---	8.35	---	---
(2) Natural Gas Boilers (2.93 MMBtu/hr)		0.20	2.57	0.141	2.16	0.015
(3) Natural Gas Space Heaters (0.16 MMBtu/hr)		0.016	0.21	0.012	0.18	0.001
(1) Dehydrator Storage Tank Heater (0.12 MMBtu/hr)		0.004	0.049	0.003	0.021	0.0003
(1) Waste Oil Tank Heater (0.10 MMBtu/hr)		0.0033	0.041	0.0024	0.018	0.0003
(1) Natural Gas Fired Building/Heat tracing Boiler (1.0 MMBtu/hr)		0.033	0.438	0.024	0.368	0.003
(1) Heater Treater (1.0 MMBtu/hr)		0.033	0.438	0.024	0.368	0.003
(1) Gasoline Storage Tank (2,000 gallon)		---	---	---	---	---
(2) Methanol Storage Tanks (2,000 gallon and 6,000 gallon)		---	---	---	---	---
(1) Diesel Storage Tank (500 gallon)		---	---	---	---	---
On-Site Vehicle Traffic		2.5	---	---	---	---
Miscellaneous VOC sources		---	---	0.22	---	---
Total		6.95	1,966.25	117.28	226.71	0.28

5,500 bhp Compressor Engine (2 Engines. 4-stroke, rich-burn)

Brake Horsepower: 5500 bhp
Hours of operation: 8760 hr/yr
Fuel Consumption: 35.8 MMBtu/hr (Company Information)

PM₁₀ Emissions (all particulate emissions are considered PM₁₀)

Emission Factor: 9.50E-03 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 35.8 MMBtu/hr * 9.50E-03 lb/MMBtu/hr * 8760 hr/yr = 2,979.28 lb/yr
2979.28 lb/yr * 0.0005 ton/lb * 2 engine(s) = 3.0 ton/yr

NO_x Emissions

Emission Factor: 18.00 gram/ bhp-hr (Mfg. Data)
Calculation: 18.00 gram/ bhp-hr * 5500 bhp * 0.002205 lb/gram * 8760 hr/yr = 1,912,264.2 lb/yr
1,912,264.2 lb/yr * 0.0005 ton/lb * 2 engine(s) = 1,912.3 ton/yr

VOC Emissions

Emission Factor: 0.80 gram/ bhp-hr
Calculation: 0.80 gram/ bhp-hr * 5500 bhp * 0.002205 lb/gram * 8760 hr/yr = 84,989.5 lb/yr
84,989.5 lb/yr * 0.0005 ton/lb * 2 engine(s) = 85.0 ton/yr

CO Emissions

Emission Factor: 1.5 gram/ bhp-hr
Calculation: 1.5 gram/ bhp-hr * 5500 bhp * 0.002205 lb/gram * 8760 hr/yr = 159,355.35 lb/yr
159,355.35 lb/yr * 0.0005 ton/lb * 2 engine(s) = 159.4 ton/yr

SO_x Emissions

Emission Factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 35.8 MMBtu/hr * 5.88E-04 lb/MMBtu/hr * 8760 hr/yr = 184.4 lb/yr
184.4 lb/yr * 0.0005 ton/lb * 2 engine(s) = 0.18 ton/yr

1,140 bhp Compressor Engine (3 Engines, 4-stroke, lean-burn)

Brake Horsepower: 1140 bhp
Hours of operation: 8760 hr/yr
Fuel Consumption: 8.8 MMBtu/hr (Company Information)

PM₁₀ Emissions (all particulate emissions are considered PM₁₀)

Emission Factor: 9.91E-03 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00 - uncontrolled)
Calculation: 8.8 MMBtu/hr * 9.91E-03 lb/MMBtu/hr * 8760 hr/yr = 763.9 lb/yr
763.9 lb/yr * 0.0005 ton/lb * 3 engine(s) = 1.1 ton/yr

NOx Emissions

Emission Factor: 3.02 lb/hr (Permit Limit)
Calculation: 3.02 lb/hr * 8760 hr/yr = 26,455.2 lb/yr
26,455.2 lb/yr * 0.0005 ton/lb * 3 engine(s) = 39.7 ton/yr

VOC Emissions

Emission Factor: 1.78 lb/hr (Permit Limit)
Calculation: 1.78 lb/hr * 8760 hr/yr = 15,592.8 lb/yr
15,592.8 lb/yr * 0.0005 ton/lb * 3 engine(s) = 23.4 ton/yr

CO Emissions

Emission Factor: 4.78 lb/hr (Permit Limit)
Calculation: 4.78 lb/hr * 8760 hr/yr = 41,872.8 lb/yr
41,872.8 lb/yr * 0.0005 ton/lb * 3 engine(s) = 62.8 ton/yr

SOx Emissions

Emission Factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-2, 7/00 - uncontrolled)
Calculation: 8.8 MMBtu/hr * 5.88E-04 lb/MMBtu/hr * 8760 hr/yr = 45.3 lb/yr
45.3 lb/yr * 0.0005 ton/lb * 3 engine(s) = 0.068 ton/yr

297 bhp Compressor Engine (1 Emergency Engine, 4-stroke, rich-burn)

Brake Horsepower: 297 bhp
Hours of operation: 500 hr/yr
Fuel Consumption: 2.2 MMBtu/hr (Company Information)

PM₁₀ Emissions (all particulate emissions are considered PM₁₀)

Emission Factor: 9.50E-03 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 2.2 MMBtu/hr * 9.50E-03 lb/MMBtu/hr * 500 hr/yr = 10.45 lb/yr
10.45 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.005 ton/yr

NOx Emissions

Emission Factor: 18.00 gram/ bhp-hr (Mfg. Data)
Calculation: 18.00 gram/ bhp-hr * 297 bhp * 0.002205 lb/gram * 500 hr/yr = 5,894.0 lb/yr
5,894.0 lb/yr * 0.0005 ton/lb * 1 engine(s) = 2.95 ton/yr

VOC Emissions

Emission Factor: 0.80 gram/ bhp-hr
Calculation: 0.80 gram/ bhp-hr * 297 bhp * 0.002205 lb/gram * 500 hr/yr = 262.0 lb/yr
262.0 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.13 ton/yr

CO Emissions

Emission Factor: 1.5 gram/ bhp-hr
Calculation: 1.5 gram/ bhp-hr * 297 bhp * 0.002205 lb/gram * 500 hr/yr = 491.2 lb/yr
491.2 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.25 ton/yr

SOx Emissions

Emission Factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 2.2 MMBtu/hr * 5.88E-04 lb/MMBtu/hr * 500 hr/yr = 0.65 lb/yr
0.65 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.0003 ton/yr

770 bhp Compressor Engine (1 Emergency Engine, 4-stroke, rich-burn)

Brake Horsepower: 770 bhp
Hours of operation: 500 hr/yr
Fuel Consumption: 5.5 MMBtu/hr (Permit Application Information)

PM₁₀ Emissions (all particulate emissions are considered PM₁₀)

Emission Factor: 9.50E-03 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 5.5 MMBtu/hr * 9.50E-03 lb/MMBtu/hr * 500 hr/yr = 26.1 lb/yr
26.1 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.013 ton/yr

NO_x Emissions

Emission Factor: 16.4 gram/ bhp-hr (Mfg. Data)
Calculation: 16.4 gram/ bhp-hr * 770 bhp * 0.002205 lb/gram * 500 hr/yr = 13,922.4 lb/yr
13,922.4 lb/yr * 0.0005 ton/lb * 1 engine(s) = 6.96 ton/yr

VOC Emissions

Emission Factor: 0.37 gram/ bhp-hr
Calculation: 0.37 gram/ bhp-hr * 770 bhp * 0.002205 lb/gram * 500 hr/yr = 314.1 lb/yr
314.1 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.16 ton/yr

CO Emissions

Emission Factor: 1.52 gram/ bhp-hr
Calculation: 1.52 gram/ bhp-hr * 770 bhp * 0.002205 lb/gram * 500 hr/yr = 1,290.4 lb/yr
1,290.4 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.65 ton/yr

SO_x Emissions

Emission Factor: 5.88E-04 lb/MMBtu (AP-42, Chapter 3, Table 3.2-3, 7/00 - uncontrolled)
Calculation: 5.5 MMBtu/hr * 5.88E-04 lb/MMBtu/hr * 500 hr/yr = 1.62 lb/yr
1.62 lb/yr * 0.0005 ton/lb * 1 engine(s) = 0.001 ton/yr

PAMCO Dehydration Unit

Hours of Operation: 8760 hr/yr

0.75 MMBtu/hour Dehydration Boiler

Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)
Fuel Consumption: 0.75 MMBtu/hr (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: 7.6 lb/MMscf * 1 MMscf/ 1000 MMBtu * 0.75 MMBtu/hr = 0.006 lb/hr
0.006 lb/hr * 8760 hr/yr * 0.0005 ton/lb = 0.025 ton/yr

NO_x Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: 100 lb/MMscf * 1 MMscf/ 1000 MMBtu * 0.75 MMBtu/hr = 0.075 lb/hr
0.075 lb/hr * 8760 hr/yr * 0.0005 ton/lb = 0.33 ton/yr

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: 5.5 lb/MMscf * 1 MMscf/ 1000 MMBtu * 0.75 MMBtu/hr = 0.004 lb/hr
0.004 lb/hr * 8760 hr/yr * 0.0005 ton/lb = 0.018 ton/yr

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: 84 lb/MMscf * 1 MMscf/ 1000 MMBtu * 0.75 MMBtu/hr = 0.063 lb/hr
0.063 lb/hr * 8760 hr/yr * 0.0005 ton/lb = 0.276 ton/yr

SO_x Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: 0.6 lb/MMscf * 1 MMscf/ 1000 MMBtu * 0.75 MMBtu/hr = 0.0005 lb/hr
0.0005 lb/hr * 8760 hr/yr * 0.0005 ton/lb = 0.002 ton/yr

Dehydrator (50 MMscf/day (dry gas))

VOC Emissions (Regenerator, Flash Tank) = 4.35 ton/yr (GRI GlyCalc, Version 4.0) (Permit Application)

ALCO Dehydration Unit

Hours of Operation: 8760 hr/yr

0.60 MMBtu/hour Dehydration Boiler

Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

Fuel Consumption: 0.60 MMBtu/hr (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.60 \text{ MMBtu/hr} = 0.005 \text{ lb/hr}$
 $0.005 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.02 \text{ ton/yr}$

NOx Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)

Calculation: $100 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.60 \text{ MMBtu/hr} = 0.06 \text{ lb/hr}$
 $0.06 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.26 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.60 \text{ MMBtu/hr} = 0.003 \text{ lb/hr}$
 $0.003 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.014 \text{ ton/yr}$

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)

Calculation: $84 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.60 \text{ MMBtu/hr} = 0.05 \text{ lb/hr}$
 $0.05 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.22 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.60 \text{ MMBtu/hr} = 0.0004 \text{ lb/hr}$
 $0.0004 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.002 \text{ ton/yr}$

Dehydrator (60 MMscf/day (dry gas))

VOC Emissions (Regenerator, Flash Tank) = 4.00 ton/yr (GRI GlyCalc, Version 4.0) (Permit Application)

Natural Gas Boilers (2 boilers)

Hours of operation: 8760 hr/yr

Fuel Consumption: 2.93 MMBtu/hr (Permit Application Information)

Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 2.93 \text{ MMBtu/hr} = 0.022 \text{ lb/hr}$
 $0.022 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 2 \text{ boiler(s)} = 0.20 \text{ ton/yr}$

NOx Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)

Calculation: $100 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 2.93 \text{ MMBtu/hr} = 0.293 \text{ lb/hr}$
 $0.293 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 2 \text{ boiler(s)} = 2.57 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 2.93 \text{ MMBtu/hr} = 0.016 \text{ lb/hr}$
 $0.016 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 2 \text{ boiler(s)} = 0.141 \text{ ton/yr}$

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)

Calculation: $84 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 2.93 \text{ MMBtu/hr} = 0.246 \text{ lb/hr}$
 $0.246 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 2 \text{ boiler(s)} = 2.16 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)

Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 2.93 \text{ MMBtu/hr} = 0.002 \text{ lb/hr}$
 $0.002 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 2 \text{ boiler(s)} = 0.015 \text{ ton/yr}$

Natural Gas Space Heaters (3 space heaters)

Hours of operation: 8760 hr/yr
Fuel Consumption: 0.16 MMBtu/hr (Permit Application Information)
Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.16 \text{ MMBtu/hr} = 0.0012 \text{ lb/hr}$
 $0.0012 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ heater(s)} = 0.016 \text{ ton/yr}$

NOx Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $100 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.16 \text{ MMBtu/hr} = 0.016 \text{ lb/hr}$
 $0.016 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ heater(s)} = 0.21 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.16 \text{ MMBtu/hr} = 0.001 \text{ lb/hr}$
 $0.001 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ heater(s)} = 0.012 \text{ ton/yr}$

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $84 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.16 \text{ MMBtu/hr} = 0.013 \text{ lb/hr}$
 $0.013 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ heater(s)} = 0.18 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.16 \text{ MMBtu/hr} = 0.0001 \text{ lb/hr}$
 $0.0001 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} * 3 \text{ heater(s)} = 0.001 \text{ ton/yr}$

Dehydrator Storage Tank Heater

Hours of operation: 8760 hr/yr
Fuel Consumption: 0.12 MMBtu/hr (Permit Application Information)
Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.12 \text{ MMBtu/hr} = 0.0009 \text{ lb/hr}$
 $0.0009 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.004 \text{ ton/yr}$

NOx Emissions

Emission Factor: 94 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $94 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.12 \text{ MMBtu/hr} = 0.0113 \text{ lb/hr}$
 $0.0113 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.049 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.12 \text{ MMBtu/hr} = 0.0007 \text{ lb/hr}$
 $0.0007 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.003 \text{ ton/yr}$

CO Emissions

Emission Factor: 40 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $40 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.12 \text{ MMBtu/hr} = 0.0048 \text{ lb/hr}$
 $0.0048 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.021 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf/ } 1000 \text{ MMBtu} * 0.12 \text{ MMBtu/hr} = 0.0001 \text{ lb/hr}$
 $0.0001 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.0003 \text{ ton/yr}$

Waste Oil Tank Heater

Hours of operation: 8760 hr/yr
Fuel Consumption: 0.10 MMBtu/hr (Permit Application Information)
Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 0.10 \text{ MMBtu/hr} = 0.0008 \text{ lb/hr}$
 $0.0008 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.0033 \text{ ton/yr}$

NOx Emissions

Emission Factor: 94 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $94 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 0.10 \text{ MMBtu/hr} = 0.0094 \text{ lb/hr}$
 $0.0094 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.041 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 0.10 \text{ MMBtu/hr} = 0.0006 \text{ lb/hr}$
 $0.0006 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.0024 \text{ ton/yr}$

CO Emissions

Emission Factor: 40 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $40 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 0.10 \text{ MMBtu/hr} = 0.004 \text{ lb/hr}$
 $0.004 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.018 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 0.10 \text{ MMBtu/hr} = 0.0001 \text{ lb/hr}$
 $0.0001 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.0003 \text{ ton/yr}$

Natural Gas Fired Building/ Heat Tracing Boiler (at Heater Treater)

Hours of operation: 8760 hr/yr
Fuel Consumption: 1.0 MMBtu/hr (Permit Application Information)
Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.008 \text{ lb/hr}$
 $0.008 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.033 \text{ ton/yr}$

NOx Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $100 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.10 \text{ lb/hr}$
 $0.10 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.438 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.0055 \text{ lb/hr}$
 $0.0055 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.024 \text{ ton/yr}$

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $84 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.084 \text{ lb/hr}$
 $0.084 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.368 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf} / 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.0006 \text{ lb/hr}$
 $0.0006 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.003 \text{ ton/yr}$

Heater Treater

Hours of operation: 8760 hr/yr
Fuel Consumption: 1.0 MMBtu/hr (Permit Application Information)
Fuel Heating Value: 1000 MMBtu/ MMscf (Permit Application Information)

PM₁₀ Emissions

Emission Factor: 7.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $7.6 \text{ lb/MMscf} * 1 \text{ MMscf/} 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.008 \text{ lb/hr}$
 $0.008 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.033 \text{ ton/yr}$

NOx Emissions

Emission Factor: 100 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $100 \text{ lb/MMscf} * 1 \text{ MMscf/} 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.10 \text{ lb/hr}$
 $0.10 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.438 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $5.5 \text{ lb/MMscf} * 1 \text{ MMscf/} 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.0055 \text{ lb/hr}$
 $0.0055 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.024 \text{ ton/yr}$

CO Emissions

Emission Factor: 84 lb/MMscf (AP-42, Chapter 1, Table 1.4-1, 7/98)
Calculation: $84 \text{ lb/MMscf} * 1 \text{ MMscf/} 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.084 \text{ lb/hr}$
 $0.084 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.368 \text{ ton/yr}$

SOx Emissions

Emission Factor: 0.6 lb/MMscf (AP-42, Chapter 1, Table 1.4-2, 7/98)
Calculation: $0.6 \text{ lb/MMscf} * 1 \text{ MMscf/} 1000 \text{ MMBtu} * 1.0 \text{ MMBtu/hr} = 0.0006 \text{ lb/hr}$
 $0.0006 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.003 \text{ ton/yr}$

On-Site Vehicle Traffic

Vehicle Miles Traveled (VMT): 5 VMT/day
Number of Operating Days: 365 days/yr

PM₁₀ Emissions

PM Emission Factor (Rated Load Capacity < 50 tons)
Emission Factor: 2.7 lb/VMT (DEQ Policy Statement (Haul Road Emissions Factors) dated 04-25-1994)
Calculation: $2.7 \text{ lb/VMT} * 5 \text{ VMT/day} * 365 \text{ days/yr} * 0.0005 \text{ ton/lb} = 2.5 \text{ ton/yr}$

Miscellaneous VOC Sources

Hours of Operation: 8760 hr/yr
Emission Factors: Methanol Tanks: 74.14 lb/yr (MAQP #1626-04 analyses)
Fuel Storage Tanks: 371.03 lb/yr (MAQP #1626-04 analyses)
Fugitives: 0.47 lb/yr (MAQP #1626-04 analyses)

VOC Emissions

Calculation: $(74.14 \text{ lb/yr} + 371.03 \text{ lb/yr} + 0.47 \text{ lb/yr}) * 0.0005 \text{ ton/lb} = 0.22 \text{ ton/yr}$

V. Existing Air Quality

The Blaine County #1 Compressor Station is located in the NW¼ of Section 29, Township 31 North, Range 18 East, in Blaine County, Montana. The air quality classification for the area is “Better than National Standards” or unclassifiable/attainment for the National Ambient Air Quality Standards (NAAQS) for criteria pollutants (40 CFR 81.327).

VI. Air Quality Impacts

The current permit action is an administrative permitting action with no associated increase in potential emissions. Therefore, there are no air quality impacts expected.

VII. Ambient Air Impact Analysis

The current permit action is an administrative permitting action with no associated increase in potential emissions. Therefore, the Department did not conduct an ambient air impact analysis. MAQP #1626-09 has limits and conditions that are designed to be protective of all ambient air quality standards.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

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

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

IX. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an Environmental Assessment is not required.

Analysis Prepared By: Deanne Fischer

Date: January 29, 2014