MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
1520 E. Sixth Avenue
P.O. Box 200901
Helena, Montana 59620-0901

Barrick Golden Sunlight
Golden Sunlight Mines Inc.
453 Montana Hwy 2 East
Whitehall, MT 59759

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		
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 – Montana Air Quality Permit (MAQP)	X		MAQP #1689-08
New Source Performance Standards (NSPS)	X		40 CFR 60, Subpart A and Subpart LL, If FOP is constructed in the future.
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	
Maximum Achievable Control Technology (MACT)	X		40 CFR 63, Subpart EEEEEEE
Major New Source Review (NSR) – includes Prevention of Significant Deterioration (PSD) and/or Non-attainment Area (NAA) NSR		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
Compliance Assurance Monitoring (CAM)		X	
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 Barrick Golden Sunlight (GSM) on April 3, 2014, and on information contained in the Montana Air Quality Permit (MAQP) #1689-08.

B. Facility Location

GSM operates an open pit gold mine including ore processing operations, located at Township 2 North, Range 3 West, Jefferson County, Montana, near the southern end of the Bull Mountains, approximately 5 air miles northeast of Whitehall, Montana, at an elevation of 5,200 feet mean sea level (MSL). The physical address is 453 Montana Highway 2 East, Whitehall, MT.

C. Facility Background Information

MAQP History

MAQP #1499 was originally issued to Placer Amex for the Golden Sunlight Mine by the Montana Department of Health and Environmental Sciences, Air Quality Bureau on November 13, 1980. Placer Dome US, successor in interest to Placer Amex, transferred the permit to Golden Sunlight Inc. (Golden Sunlight) in early 1982.

MAQP #1689 was issued on July 1, 1982, as an alteration to Golden Sunlight's existing permit. MAQP #1689 replaced MAQP #1499. The permit alteration consisted of the following:

The primary crusher changed from a jaw to a gyratory. The gyratory crusher had a higher ore feed rate; however, Golden Sunlight did not propose to increase production. Therefore, potential uncontrolled emissions for this replacement were unchanged. The gyratory crusher operated fewer hours per day to crush the same amount of ore. This allowed for less handling of stockpiled ore that reduced emissions.

The coarse screen location was moved within the enclosed secondary crushing building that added another conveyor discharge point to the circuit. A coarse ore stockpile was included in the circuit. The material was pre-screened to remove fines. Ducon-Mikropul dust collectors were used instead of Jay Turbulaire. Configuration of some of the dust collection was changed. Manufacturer's literature indicated that the dust collection efficiency was improved. Natural gas was used rather than propane in the process boiler, carbon reactivation furnace, and the bullion furnace. This fuel change had a negligible effect on the emission estimates. Estimates of potential, uncontrolled particulate matter (PM) emissions increased by 3.7 tons per year (tpy), while estimates of actual, controlled PM emissions decreased by 25.7 tpy, as a result of these alterations.

MAQP #1689A was issued on May 26, 1987. Golden Sunlight applied for a permit alteration to increase ore and waste production above the previous permit limit. This alteration was based on a projected ore production and mill throughput of 2,600,000 tpy and a waste production level of 14,900,000 tpy. The previous totals were 1,750,000 tpy of ore and 2,275,000 tpy of waste. The ore production increase was primarily due to a gradual decrease in ore hardness that in turn allowed for an increase in mill throughput using the existing equipment. Waste production also increased due to increases in the overburden stripping ratio. The PM emission inventory was updated using new emission factors. The increase in production and mill throughput resulted in an increase in uncontrolled PM emissions of 378 tpy. The majority of these PM emissions were fugitives, with stack emissions only increasing from 1.6 to 2.3 tpy.

MAQP #1689A-3 was issued on July 20, 1990, for an increase in the ore and waste production limits.

MAQP #1689-04 was issued on June 11, 1993, to increase production limits from 17.5 million tons per year (waste - 14.9 million, ore - 2.6 million) to 39.2 million tons per year (waste - 36.7 million, ore - 2.5 million). The acreage of the disturbed areas also increased. The additional disturbed acres were used as sites for tailings, ore storage, and mine waste rock disposal. All other existing equipment, facilities and procedures remained the same. Also, the ambient monitoring requirement for analysis of trace metals was deleted.

MAQP #1689-05 was issued on June 21, 1998. Golden Sunlight, in a letter dated April 27, 1998, requested a determination on the need for a permit alteration for the installation and operation of an INCO SO_2/AIR Cyanide Destruction System. Golden Sunlight identified minimal emissions from the INCO system. The INCO system is a single stage, slurry treatment that uses ammonium bisulfide (NH_4HSO_3) to destroy cyanide during a retention cycle of approximately 3 hours. The INCO system emits approximately 2.6 ton/day of ammonium (NH3). However, NH_3 is not a regulated air pollutant. The INCO system was designed to destroy 223 lb/hour of weak-acid, dissociable cyanide in the mine's tailings slurry stream (at a discharge rate of 1,897 gallons/minute with 50% solids by weight). The INCO system removes over 99% of the cyanide from the gold plant's tailings slurry leaving a final cyanide concentration in the treated effluent of about 2 ppm.

On May 6, 1998, the Department of Environmental Quality (Department) determined that the INCO Cyanide Destruction System would not require an alteration to MAQP #1689-04 because the proposed changes would not cause any increase in regulated air pollutants. However, the Department modified MAQP #1689-04 and included a description of the INCO system so that the permit would include a complete and accurate account of the mine operations. Also, the Department updated the rule references in the permit. MAQP #1689-05 replaced MAQP #1689-04.

MAQP #1689-06 was issued on June 30, 2001. The Department received a letter, dated December 28, 2000, from Golden Sunlight requesting termination of the ambient air monitoring network. The Department reviewed the ambient air monitoring data following the October 9, 1998, permitting guidance statement. In a letter dated February 28, 2001, the Department agreed to Golden Sunlight's request to terminate the ambient monitoring program, effective April 1, 2001. The permit action updated the monitoring requirements to reflect the termination of the ambient air monitoring network. Also, the permit was updated to reflect the latest organizational format. MAQP #1689-06 replaced MAQP #1689-05.

MAQP #1689-07 was issued on June 30, 2010. The Department received a letter, dated February 25, 2010, from GSM requesting that MAQP #1689-06 be modified to include the construction and operation of a Fine Ore Processing (FOP) unit. The addition of the FOP unit resulted in the generation of particulate emissions of less than 15 tons per year. Therefore, the FOP unit was added in accordance with ARM 17.8.745. In addition, the Department received a letter dated April 2, 2010, from GSM requesting that MAQP #1689-06 be modified to include changes to the crushing circuit that would eliminate or minimize emissions from the coarse ore stockpile. The permit action added the FOP equipment to the list of permitted equipment, modified the description of the crushing circuit, and updated the permit to reflect the current permit language and rule references used by the Department. MAQP #1689-07 replaced MAQP #1689-06.

MAQP #1689-08 was issued on August 9, 2014. The Department received an application on June 9, 2014, from GSM requesting that MAQP #1689-07 be modified to include the addition of a diesel-powered stacker to handle periods whenever the tertiary crusher would be bypassed. In 2007, a tertiary crusher de minimis bypass request was approved; however, this request for modification also included a capacity increase greater than the earlier de minimis request. The permit action added the additional stacker, modified the description of the crushing circuit, provided a minor administrative correction to Section II.A.14, and updated the permit to reflect the current permit language and rule references used by the Department. Language was also added to address the possible future construction of a fine ore processing unit (FOP) which would trigger 40 CFR Part 60, Subpart LL. MAQP #1689-08 replaced MAQP #1689-07.

Operating Permit Background

GSM was required to submit a Title V Operating Permit Application as required by 40 CFR 63, Subpart EEEEEEE - National Emission Standards for Hazardous Air Pollutants: Gold Mine Ore Processing and Production Area Source Category (Subpart EEEEEEE). GSM has three emitting units which are addressed in Subpart EEEEEEE where specific requirements are identified. The application was determined to be administratively and technically complete on April 17, 2014. The Title V Operating Permit was issued as permit **#OP1689-00**.

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 is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 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.

E. Compliance Designation

GSM was reviewed for compliance with MAQP #1689-07 on July 9, 2014 and found to be in compliance with all requirements of the permit. GSM submitted a report on June 5, 2015, indicating test results below the 0.17 lbs mercury per ton of concentrate Subpart EEEEEEE limit.

SECTION II. SUMMARY OF EMISSIONS UNITS

A. Facility Process Description

GSM operates an open pit gold mine and ore processing facility for the beneficiation of gold bearing ore. Ore is extracted from the mine using conventional open pit mining methods involving drilling, blasting, loading and hauling. The ore is delivered to the mill crushing area where it undergoes 3 stages of crushing, using gyratory and cone crushers followed by wet grinding in rod and ball mills. The ore passes through a leaching process where ore slurry is contacted with dilute sodium cyanide solution to obtain the optimum extraction of gold. The resulting gold bearing solution is sent through a washing circuit. GSM proposes to improve gold recovery through the construction and operation of a FOP. It has been determined that a recoverable quantity of gold remains in the wet slurry tailings generated by the current processing facilities at GSM.

B. Emissions Units and Pollution Control Device Identification

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	Carbon Reactivation Kiln	Wet Scrubber #2 followed by Carbon Filter
EU002	Electrowinning Cells	None
EU003	Refinery Furnace	Wet Scrubber #3
EU004	Primary Crushing	Wet Scrubber #1
EU005	Secondary Crushing	Wet Scrubber #1
EU006	Tertiary Crushing	Wet Scrubber #1
EU007	Fine Ore Mill Process including Belt 10	Water Spray/Bag Filters/Wet Scrubber #4
EU008	Fine Ore Processing Unit (FOP)	Filter Baghouse
EU009	Conveyors and Pick-Up Points in the Secondary Crushing Building	Wet Scrubber #1

C. Categorically Insignificant Sources/Activities

GSM did not provide a list of insignificant sources/activities.

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

GSM was required to submit a Title V Operating Permit Application as required by 40 CFR 63, Subpart EEEEEEE as it is an Area Source. GSM has three emitting units which are addressed in Subpart EEEEEEE where specific requirements are identified. These include the refinery furnace, electrowinning cells and carbon reactivation kiln. A mercury limit of 0.17 lbs per ton of concentrate is required to be demonstrated on an annual basis. In order to meet the mercury limit, GSM had to install a carbon filter on the carbon reactivation kiln. 40 CFR 63, Subpart EEEEEEE also has specific requirements for facilities which utilize carbon filters for mercury control. These include monitoring the performance of the carbon to prevent unexpected breakthrough achieved either through exhaust monitoring for mercury or testing the carbon for remaining useful life.

Permit conditions also are in place for the crushing and ore handling activities which require a compliance demonstration of either weekly visual surveys or a semi-annual Method 9 test. Additionally, particulate emissions are controlled through the use of four wet scrubbers which must be monitored for proper operation and records kept of maintenance activities. Scrubbers are required to be tested for particulate once every four years and must not exceed 0.05 grams per dry standard cubic meter.

B. Monitoring Requirements

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

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance do not require the permit to impose the same level of rigor for all emissions units. Furthermore, they do not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions 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 emissions units.

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

C. Test Methods and Procedures

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

D. Recordkeeping Requirements

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

E. Reporting Requirements

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

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Montana Standard* newspaper on or before April 30, 2015. The Department provided a 30-day public comment period on the draft operating permit from April 30, 2015, to June 1, 2015. 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 June 1, 2015, will be summarized, along with the Department's responses, in the following table. All comments received during the public comment period will be promptly forwarded to GSM so they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
	None received	

G. Draft Permit Comments (again, only include if applicable as a part of the current permit action, as in a new permit, renewal, or significant mod)

Summary of Permittee Comments

Permit Reference From Draft	Permittee Comment	Department Response
III. EU001, EU002, EU003, EU004, EU005, EU006, EU007, and EU009	A reoccurring GSM comment addresses the proposed application of 40 CFR 60 Subpart LL emission limits to all the emission units listed in the permit, if Emission Unit ID EU008, Fine Ore Processing Unit (FOP), is constructed and operated. GSM's believes that 40 CFR Subpart LL would only apply to the FOP (which has not yet been constructed), and not to other emitting units at the GSM facility. The standard of 40 CFR 60 Subpart LL applies only to new, modified or reconstructed "affected sources." Since the FOP facility will contain new affected sources, Subpart LL will be applicable to those affected sources once they are constructed. However, the FOP facility will not result in a modification or reconstruction to existing, grandfathered emission units and, therefore, those units should continue to not be subject to Subpart LL.	The Department concurs that these emitting units should not have included language for 40 CFR 60 Subpart LL, and therefore all conditions related to Subpart LL for these specific emitting units have been deleted. The Subpart LL reference remains in place for the FOP, should it be constructed.
III.A.14	GSM requests the Department add the proposed sentence to be clear no SSM Plan is required. This language is also referenced in Condition A.15 . *GSM is not subject to a NESHAP or MACT standard that requires an SSM plan as of the date of this permit.*	The Department agrees that Table 1 of Subpart EEEEEEE specifically excludes SSM at the time of permit issuance and has added a statement to reflect that but also that future Subpart EEEEEEE changes could change that language.
III.B.15	GSM proposes adding the carbon bed to clarify compliance requirements. *GSM shall combine the total mercury from the carbon reactivation kiln scrubber and carbon bed, the refinery furnace scrubber and from the electrowinning cells along with the total tons of concentrate processed to demonstrate compliance with the limit in Section 111.8.6* (ARM 17.8.749, 40 CFR 63, Subpart EEEEEEE and ARM 17.8. 1213).	The Department has left the language intact, as the three sources identified are the three mercury emitting units. It is clear in your operations that the reactivation kiln exhaust first passes thru a scrubber and finally thru the carbon bed as identified in the emission unit tables in both the Technical Review Document and Operating Permit itself.
III.B.14	Typographical Consideration. Remove repeated sentence.	Modified as requested.

III.B.20	GSM proposes to change the language from design capacity to carbon loading capacity; and to define the loading capacity of the carbon by 20% of the carbon weight, prior to its having absorbed mercury. This would be consistent with how Nevada Department of Environmental Protection (NDEP) had set limits on its mercury program, which predated the federal program. GSM also proposes changing the language regarding the reporting of the carbon loading capacity from deviation to event. With the monthly sampling interval, the carbon loading could increase from below 90% to over 100% in one monthly sampling interval. Further, 40 CFR 63, Subpart EEEEEEE does not specifically designate a carbon loading legal or permit limit.	The language in this section of the permit is verbatim from 40 CFR 63, Subpart EEEEEEE, and therefore is left as is in this case. However, an additional alternative for submitting an equivalent carbon analytical method has been added. This may also require review by EPA if there is any concern that the alternate method is not deemed equivalent to results from Method 7471B.
III.C.7	GSM proposes changing the test frequency from annually to once every 4 years to reflect what is listed on the EU002 table on page 14 and consistent with other emission units within the permit's testing schedule.	Corrected to match the every 4-year frequency listed in the table.
III.C.9	Typographic Consideration, break C.9 into two sentences for clarity.	Modified as requested.
III.F.9	Typographic consideration; Conditions F9 appears to repeat Condition F.8	The fugitive requirement is from Subpart LL and has a different requirement for fugitives versus a point source and therefore is left as is.
Various	Please identify EPA Methods 5, 201 or 201A as all being appropriate for particulate matter compliance demonstrations in all tables.	Modified as requested.
Various	GSM requests that the Method 9 observation period if any one reading is 20% or greater be changed from 20 to 18 minutes to reflect the 6 minute increments required for a Method 9 test	The 20 minute requirement is standard Department Title V permit language. Left as is.

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

GSM did not request a shield from any non-applicable requirements in their application.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards (Part 63)

The source is now subject to 40 CFR 63, Subpart EEEEEEE but the Department is not aware of any other MACT standards that will be applicable to this source.

B. NESHAP Standards (Part 61)

As of the date of permit issuance, the Department is not aware of any NESHAP Standards that are applicable to this source.

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

C. NSPS Standards

When GSM constructs and operates the Fine Ore Processing Unit EU008, the entire facility will become an "affected source" and will be subject to 40 CFR 60, Subpart A and LL.

D. Risk Management Plan

As of March 17, 2015, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

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

E. CAM Applicability

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

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

Unit(s) determination(s)

There are no emitting units subject to CAM at this facility.

F. PSD and Title V Greenhouse Gas Tailoring Rule

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

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

Starting on July 1, 2011, PSD permitting requirements would be triggered for modifications that were determined to be major under PSD based on GHG emissions alone, even if no other pollutant triggered a major modification. In addition, sources that are not considered PSD major sources based on criteria pollutant emissions would become subject to PSD review if their facility-wide potential emissions equaled or exceeded 100,000 TPY of CO_2e and 100 or 250 TPY of GHG on a mass basis depending on their listed status in ARM 17.8.801(22) and they undertook a permitting action with increases of 75,000 TPY or more of CO_2e and greater than 0 TPY of GHG on a mass basis. With respect to Title V, sources not currently holding a Title V permit that have potential facility-wide emissions equal to or exceeding 100,000 TPY of CO_2e and 100 TPY of GHG on a mass basis would be required to obtain a Title V Operating Permit.

Based on information provided by GSM, GSM's potential emissions fall below the GHG major source threshold of 100,000 TPY of CO2e for both Title V and PSD under the Tailoring Rule.