

**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**

**Williston Basin Interstate Pipeline Company
Cabin Creek Compressor Station
E¹/₂ of SE¹/₄ of SE¹/₄, Section 16, Township 10 North, Range 58 East, Fallon County
1651 Cabin Creek Road #1
Baker, MT 59313**

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		Portable Analyzer
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			
Administrative Rules of Montana (ARM) Subchapter 7 – Montana Air Quality Permit (MAQP)	X		2484-04
New Source Performance Standards (NSPS)	X		40 CFR 60, Subpart GG
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR) – 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		

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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 Title V application submitted by Williston Basin Interstate Pipeline Company (WBI) on June 12, 1996 and Title V renewal applications and supporting documents submitted on January 30, 2003, February 3, 2003, and September 23, 2008. Information was also taken from Montana Air Quality Permits (MAQP) for Cabin Creek Compressor Station issued May 31, 1988, July 17, 1992, March 31, 1994, and June 3, 2003.

B. Facility Location

WBI owns and operates the Cabin Creek Compressor Station. This facility is located in the E $\frac{1}{2}$ of SE $\frac{1}{4}$ of SE $\frac{1}{4}$ of Section 16, Township 10 North, Range 58 East, in Fallon County, Montana. Fallon County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Cabin Creek Compressor Station is located in a remote location 20 miles northwest of Baker, Montana. The adjacent land is used for grain cropland and rangeland. The area is also a developed oil and gas field. The nearest residences are the company-owned WBI employee housing located approximately 1000 yards away.

C. Facility Background Information

Montana Air Quality Permit

On May 31, 1988, WBI was issued an MAQP for the operation of the Cabin Creek Compressor Station consisting of 16 natural gas compressor engines, located in the SW $\frac{1}{4}$, SE $\frac{1}{4}$, Section 16, Township 10 North, Range 58 East, Fallon County, Montana. The application was assigned **MAQP #2484-00**.

On July 17, 1992, WBI was issued a permit to replace an existing 1961 Waukesha 1197G generator engine (248 horsepower (hp)) with a 1992 Waukesha 3521GL generator engine (544 hp) at their Cabin Creek facility. The old engine was removed. The application was assigned **MAQP #2484-01**.

The Montana Department of Environmental Quality's (Department) BACT determination for MAQP #2484-01 was the use of a Waukesha, Model 3521GL Lean Burn Combustion gas engine with emission factors of 2.0, 2.0, and 1.0 grams per brake horsepower hour (g/bhp-hr) for oxides of nitrogen (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC), respectively.

On March 31, 1994, WBI was issued a permit to increase the permitted operational horsepower and the CO emission factor for the recently permitted 1992 Waukesha 3512GL generator engine (544 hp). The engine was originally permitted to operate at 1200 revolutions per minute (RPM) and the corresponding CO emission factor of 2.0 g/bhp-hr. The actual installed horsepower of the engine/generator set was site rated at 559 hp and limited to 900 RPM. This de-torquing of the engine generally increased the CO emissions; therefore, WBI could only achieve the manufacturer's guaranteed emissions under limited conditions. This emission factor was also due to increase as a result of site-specific fuel analysis quality. WBI submitted a revised manufacturer's emission guarantee for CO of 3.3 g/bhp-hr based on the results of a site-specific fuel analysis.

WBI also requested that the permitted emission limits be expressed in pounds per hour (lb/hr) rather than g/bhp-hr, which is consistent with the Department's revised guidelines. The revision to the guidelines for developing an emission limitation is due to varying parameters such as engine RPM, operating load (brake horsepower (bhp)), ambient air temperature, gas temperature, site elevation, fuel gas quality, air/fuel ratio (AFR), field gas conditions, etc. Rather than limit the engine to a g/bhp-hr limit, an hourly emission limit will allow operational flexibility. **MAQP #2484-02** replaced #2484-01.

On June 3, 2003, WBI was issued a permit for the installation and operation of an 1149 hp capacity natural gas-fired turbine. WBI is a major stationary source of emissions as defined under the New Source Review Prevention of Significant Deterioration (PSD) program; however, potential emissions from the proposed turbine did not exceed any PSD significant emission thresholds and the permit action did not trigger PSD review.

Further, WBI submitted a modeling analysis including annual NO_x ambient air impacts as well as 1- and 8-hour CO ambient impacts from the turbine. Based on the ambient air modeling results initially submitted by WBI, and in accordance with the Department's "Monitoring Requirements" guidance document (October 9, 1998), the WBI facility, as initially proposed, was required to conduct ambient monitoring because the modeled NO_x concentration was above 95% of the ambient standard.

Subsequently, WBI submitted a letter to the Department requesting various permit changes to keep the source emission impacts below the applicable ambient standards for NO_x and to avoid the requirement for ambient NO_x monitoring. Specifically, under this permit action, WBI was required to install a Non-Selective Catalytic Reduction (NSCR) catalyst on Emissions Unit (EU) 001, raise the stack heights on EU001 and EU004 through EU010, lower the allowable NO_x emission rates for EU008 through EU010, and limit the operating hours for EU004 to 3500 hours during any rolling 12-month time period. This permit revision included conditional requirements for all previously cited equipment and operational modifications.

Furthermore, WBI requested that the Department modify the testing schedule for the 559 hp Waukesha 3521GL (GEN1). Previously, based on Department source testing guidance, WBI was required to test GEN1 on an every 4-year schedule. However, the Title V operating permit for WBI requires semiannual testing for this unit. Therefore, at the request of WBI the testing requirements for GEN1 have been modified to incorporate language allowing for consistency between the MAQP and the Title V operating permit source testing schedules for this unit. **MAQP #2484-03** replaced #2484-02.

On August 7, 2003, WBI submitted a letter of application for a modification to MAQP #2484-03. WBI requested that the stack heights for EU001, EU004, EU005, EU006, and EU007 be lowered. Additionally, to ensure compliance with the NAAQS and the Montana Ambient Air Quality Standards (MAAQS), WBI requested hours of operation restrictions on EU004, EU005, EU006, and EU007.

An Air Dispersion Modeling Analysis was submitted along with the modification request by Aspen Consulting & Engineering Inc. (Aspen). After reviewing the permit action request and modeling analysis, the Department determined the proposed modification could be accomplished according to ARM 17.8.764(b) while adequately protecting the ambient standards.

In addition, according to ARM 17.8.764(c), the Department updated the emissions inventory based on emission factors, which more accurately reflect operation of the emitting units at WBI. The changes made to the emissions inventory do not affect substantive provisions of the permit. **MAQP #2484-04** replaced #2484-03.

Title V Operating Permit

On June 12, 1996, WBI submitted the original Title V Operating Permit application for the Cabin Creek Compressor Station. The Title V Operating Permit application was deemed administratively complete July 12, 1996, and technically complete on August 12, 1996. **Title V Operating Permit #OP2484-00** became final and effective on August 23, 1998.

On January 31, 2003, the Department received a Title V renewal application from WBI. The Title V Operating Permit renewal application was deemed administratively complete on March 3, 2003, and technically complete on October 3, 2003. **Title V Operating Permit #OP2484-01** became final and effective on March 26, 2004, and replaced Operating Permit #OP2484-00.

D. Current Permit Action

The current permit action is a renewal of WBI's Title V Operating Permit for the Cabin Creek Compressor Station. On September 23, 2008, the Department received the Title V Operating Permit renewal application from WBI for the Cabin Creek Compressor Station. The renewal application states that there have been no substantive changes to emission unit descriptions, ancillary equipments, BACT determinations, air dispersion analyses, stack height changes, or compliance demonstration practices since the issuance of #OP2484-01. The current permitting action establishes a Compliance Assurance Monitoring (CAM) plan for EU001 because it meets the requirements according to ARM 17.8.1513. **Operating Permit #OP2484-02** replaces Operating Permit #OP2484-01.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 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?

YES	NO	
	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.

F. Compliance Designation

The Department inspected the Cabin Creek Compressor Station on October 15, 2008; the facility was in compliance with all the applicable requirements. During the first semiannual period of 2009, WBI did not demonstrate valid emissions tests for NO_x or CO on EU1, EU8, EU9, EU10, EU15, and EU17. WBI had performed the required emissions tests; however, the tests were deemed to be invalid due to the use of expired calibration gases during the tests. The Department decided to determine compliance status based on the emissions test results of the second semiannual period of 2009 which WBI submitted on December 17, 2009. On January 14, 2010, the Department determined that WBI is in compliance with their emissions limits based on the emissions test results of the second semiannual period of 2009.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The Cabin Creek Compressor Station is used to compress natural gas to the required pressure for transportation within the natural gas transmission system. Compression of the gas is accomplished with the use of 13 compressor engines. The Standard Industrial Classification (SIC) for this facility is “Natural Gas Transmission” which has an SIC Code of “4922”.

B. Emissions Units and Pollution Control Device Identification

The following table summarizes the permitting equipment at the Cabin Creek Compressor Station.

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	1109 hp Waukesha L7042GSIU Reciprocating Engine	NSCR catalyst
EU004	190 hp Ingersoll-Rand 6XVG Reciprocating Engine	None
EU005	300 hp Ingersoll-Rand 8XVG Reciprocating Engine	None
EU006	300 hp Ingersoll-Rand 8XVG Reciprocating Engine	None
EU007	300 hp Ingersoll-Rand 8XVG Reciprocating Engine	None
EU008	660 hp Ingersoll-Rand 12SVG Reciprocating Engine	None
EU009	880 hp Ingersoll-Rand 48KVG Reciprocating Engine	None
EU010	880 hp Ingersoll-Rand 48KVG Reciprocating Engine	None
EU011	1100 hp Solar Saturn Phase IV Turbine Engine	None
EU012	1100 hp Solar Saturn Phase IV Turbine Engine	None
EU013	1100 hp Solar Saturn Phase IV Turbine Engine	None
EU014	1200 hp Solar Saturn Mark II Turbine Engine	None
EU015	1149 hp Solar Saturn Mark II Turbine Engine	None
EU016	3800 hp Solar Centaur Turbine Engine	None
EU017 GEN 1	559 hp Waukesha 3521GL Reciprocating Engine	None
EU018 Misc 1	15.25-MMBtu/hr Fired (Dehy) Regenerator Heater	None

NOTES

MMBtu/hr Million British thermal units per hour

C. Categorically Insignificant Sources/Activities (also known as Insignificant Emitting Units (IEUs))

ARM 17.8.1201(22)(a) defines an insignificant emissions unit as one that emits less than 5 tons per year of any regulated pollutant, has the potential to emit less than 500 pounds per year of lead or any Hazardous Air Pollutant (HAP), and is not regulated by any applicable requirement other than a generally applicable requirement.

Emissions Unit ID	Description
IEU001/FUG 1	Fugitive emissions from valves, flanges, open-ended lines, compressor seals, etc.
IEU002/MISC 2	0.819 MMBtu/hr Mueller Boiler Model 205-14
IEU003/MISC 3	0.770 MMBtu/hr Mueller Boiler Model 215-12
IEU004/MISC 4	0.450 MMBtu/hr Eclipse Heater Model D-6
IEU005/MISC 5	1.470 MMBtu/hr Bryant Heater Model 246-15
IEU006/MISC 6	Tanks (tanks containing hydrocarbon condensate, gasoline, diesel, alcohol, slop oil, ethylene glycol, and odorant)
IEU007/MISC 7	0.03 MMBtu/hr Reliance 501 water heater
IEU008/MISC 8	0.07 MMBtu/hr Siegler 550 UN-24 heater
IEU009/MISC 9	0.07 MMBtu/hr Janitrol heater

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

The 1,109 hp Waukesha Compressor Engine (EU001) is limited to 4.88 lb/hr for NO_x, 24.40 lb/hr for CO, and 0.18 lb/hr for VOC. The emission limits are based on ARM 17.8.749 determinations that were established by the Department. Emissions from EU001 are required to be controlled by a NSCR catalyst. The minimum stack height for EU001 is 9.91 meters above ground level.

The 190 hp Ingersoll-Rand Compressor Engine (EU004) shall be limited to 1,314 hours of operation during any rolling 12-month time period. The operational limit is based on ARM 17.8.749 determinations that were established by the Department. The minimum stack height for EU004 is 10.97 meters above ground level.

Each of the 300 hp Ingersoll-Rand Compressor Engines (EU005, EU006, and EU007) shall be limited to 4,380 hours of operation each during any rolling 12-month time period. The operational limit is based on ARM 17.8.749 determinations that were established by the Department. The minimum stack height for EU005, EU006, and EU007 is 10.97 meters above ground level.

The 660 hp Ingersoll-Rand Compressor Engine (EU008) is limited to 17.46 lb/hr for NO_x. The emission limit is based on ARM 17.8.749 determination that was established by the Department. The minimum stack height for EU008 is 14.94 meters above ground level.

Each of the 880 hp Ingersoll-Rand Compressor Engines (EU009 and EU010) are limited to 23.28 lb/hr for NO_x. The emission limit is based on ARM 17.8.749 determination that was established by the Department. The minimum stack height for EU009 and EU010 is 14.94 meters above ground level.

The 1,149 hp Solar Turbine (EU015) is limited to 5.07 lb/hr for NO_x, 7.60 lb/hr for CO, and 2.53 lb/hr for VOC. The emission limits are based on Best Available Control Technology (BACT) determinations that were established by the Department.

The 559 hp Waukesha Generator Engine (EU017) is limited to 2.46 lb/hr for NO_x, 4.06 lb/hr for CO, and 1.23 lb/hr for VOC. The emission limits are based on BACT determinations that were established by the Department.

In addition, emissions from each of the engines installed before November 23, 1968, are limited to 40% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E = 0.882 * H^{-0.1664}$. Emissions from each of the engines installed after November 23, 1968, are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to $E = 1.026 * H^{-0.233}$. Further, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions.

B. Monitoring Requirements

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

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance 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 emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo (**i.e., no monitoring**) will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

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

C. Test Methods and Procedures

Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit may be demonstrated by burning pipeline quality natural gas (as defined by WBI's Federal Energy Regulatory Commission (FERC) gas tariff) on an ongoing basis.

Title V Operating Permit #OP2484-02 contains requirements for semiannual testing with a portable analyzer for NO_x and CO on units EU001, EU015, and EU017; and for NO_x only on units EU008, EU009, and EU010. The permit stipulates that the portable analyzer shall be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A, or shall be capable of meeting the requirements of EPA Conditional Test Method 030 for the "Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers." WBI may use another testing procedure as approved in advance by the Department. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). WBI will then convert the NO_x and CO emissions test results from a parts per million (ppm) concentration to a lb/hr emission rate. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to monitor compliance with the emissions limitations in the permit.

The Department will use the portable analyzer testing results as a direct measure of compliance. The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the WBI 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 *Fallon County Times* newspaper on or before November 25, 2009. The Department provided a 30-day public comment period on the draft operating permit from November 25, 2009, to December 28, 2009. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by December 28, 2009 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 WBI so they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
	No public comments received.	

G. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Cover Sheet, page i	The facility address should be changed from P.O. Box 131, Glendive, MT 59330 to 1651 Cabin Creek Road #1, Baker, MT 59313.	The Department has made the requested change.
Section I. General Information	Change Facility Contact Persons to Stacy Aguirre (406-359-7347) and Todd Senescall (406-359-7295).	The Department has made the requested change.
Section II. Summary of Emission Units	EU018 MISC 1 should have glycol removed from its description as this is a dry sorbead dehydration process rather than TEG glycol.	The Department has made the requested change.
Section III.A.14	WBI requests this condition be removed from the permit. The engines at this facility are not subject to the provisions of 40 CFR 63, Subpart ZZZZ. Therefore, none of the emitting units at this facility are required to submit Startup, Shutdown, Malfunction (SSM) Plan under 40 CFR 63, Subpart ZZZZ or ARM 17.8.342.	The Department concurs that as of the issuance date of this permit, 40 CFR 63, Subpart ZZZZ is not applicable to the emitting units at the facility and therefore WBI is not required to submit any SSM plans for them. Section III.A.14 states that the submittal of a SSM plan is only required when applicable. The Department feels that it would not be appropriate to remove this condition because that would be inconsistent with other Title V permits which all contain this requirement as written.
Section III.B.13 & B.19	WBI requests these conditions be removed as they are addressed in B.13.	The Department feels that the conditions are appropriate as written because they follow the standard format of addressing a requirement within each portion of a subsection.
Section III.B.22	WBI requests that this condition be reworded to state "During the emissions test with the portable analyzer WBI shall record information for the compressor engine and portable analyzer as described in the Montana Source Test Protocol and Procedures Manual or an alternative procedure submitted by WBI and approved by the Department." The information listed in this condition does not need to be included in the permit since it is already	The Department has reworded this section in a manner which accommodates WBI's requested change.

Permit Reference	Permittee Comment	Department Response
	part of the testing protocol which was approved by the Department on January 12, 2007 and WBI is required to follow. This will allow changes to the protocol if necessary without requiring a modification to the permit as well.	
Section III.C.14	Change 9.91 meters to 10.97 meters.	The Department has made the requested change.
Section III.C.15	Change 10.97 meters to 14.94 meters.	The Department has made the requested change.
Section III.C.17	WBI requests that this condition be reworded to state "During the emissions test with the portable analyzer WBI shall record information for the compressor engine and portable analyzer as described in the Montana Source Test Protocol and Procedures Manual or an alternative procedure submitted by WBI and approved by the Department." The information listed in this condition does not need to be included in the permit since it is already part of the testing protocol which was approved by the Department on January 12, 2007 and WBI is required to follow. This will allow changes to the protocol if necessary without requiring a modification to the permit as well.	The Department has reworded this section in a manner which accommodates WBI's requested change.
Section III.C.25.c	WBI requests that the summary of hours submitted remain at 12 months rather than 18 since the previous 6 months of data has already been provided to the Department and WBI's recordkeeping is compiled in an annual format.	The Department has made the requested change.
Section III.D.10	WBI requests that this condition be reworded to state "During the emissions test with the portable analyzer WBI shall record information for the compressor engine and portable analyzer as described in the Montana Source Test Protocol and Procedures Manual or an alternative procedure submitted by WBI and approved by the Department." The information listed in this condition does not need to be included in the permit since it is already part of the testing protocol which was approved by the Department on January 12, 2007 and WBI is required to follow. This will allow changes to the protocol if necessary without requiring a modification to the permit as well.	The Department has reworded this section in a manner which accommodates WBI's requested change.
Section III.E Table	EU018 MISC 1 should have glycol removed from its description as this is a dry sorbead dehydration process rather than TEG glycol.	The Department has made the requested change.
Section V.E Prompt Deviation Reporting	WBI respectfully requests that the Department clarify this section of the Permit. This section is referring to ARM 17.8.12(3)(c) which WBI cannot locate to review. ARM 17.8.1212(3)(b) does discuss prompt deviation reporting and states that reports of deviations are considered prompt if they are submitted as part of routine reporting requirements under (3)(b)(should this read (3)(a)?). If ARM 17.8.1212(3)(a)	The Department appreciates the input that WBI has provided on the prompt deviation language in the permit. The ARM reference in Section V.E has been corrected to refer to ARM 17.8.1212(3)(b). The Department concurs that at the time of this permit issuance, ARM 17.8.1212(3)(b) is in error when it references (3)(b) for routine reporting requirements. ARM 17.8.1212(3)(b)

Permit Reference	Permittee Comment	Department Response
	is followed, then deviations should be reported with semiannual monitoring reports to be considered prompt. However, the permit states more stringent requirements for submitting prompt deviation reports and does not require reports to be resubmitted with regular semiannual reports. WBI requests clarification that compliance with the conditions of the permit also shows compliance with ARM as well as clarification as to what part of the ARM this condition is referencing.	should reference (3)(a) when referring to routine reporting requirements. These errors in the ARM will be addressed during future rulemaking. The Department acknowledges that the language in Section V.E varies from ARM 17.8.1212(3)(b), withstanding the errors in rule references. The language was crafted with the input of Clean Air Act Advisory Committee (CAAAC) industry stakeholders in response to an EPA review of the Montana Title V program. EPA took issue with prompt deviation reporting occurring on only a semiannual basis as is implied in the current ARM. Therefore, the Department utilized the rule language within (3)(a) which states that routine reporting must occur <i>at least</i> every six months and language within (3)(b) which states that deviations shall be reported as part of the routine reporting requirements <i>unless otherwise specified in an applicable requirement</i> . WBI must report deviations according to the applicable requirements of Section V.E. Prompt deviation reports do not need to be resubmitted with regular semiannual reports, but may be referenced by the date of submittal.
Section V.F.2.d Emergency Provisions	This section references ARM 17.8.1214(6)(d) which makes reference to fulfilling the requirements of ARM 17.8.1212(3)(c). Again, WBI requests clarification on the requirements of ARM 17.8.1212(3)(c).	The reference in question has been changed to refer to ARM 17.8.1212(3)(b). The Department again appreciates the information regarding errors within the permit and rules for prompt deviation reporting.
Appendix A. Insignificant Emission Units	Add the following sources to the table; 0.03 MMBtu/hr Reliance 501 water heater, 0.07 MMBtu/hr Siegler 550 UN-24 heater, and a 0.07 MMBtu/hr Janitrol heater	The Department has added the requested items to the table.
Appendix E. CAM Plan	WBI requests that the CAM plan be updated with the changes indicated in the attached plan. [Attached plan contains updated language stating that if the unit is not operating, it will not be started solely for the purposes of monitoring the CAM indicators. Also included is a source of the portable analyzer testing protocol.]	The Department has updated the CAM plan with the requested changes.
Technical Review Document (TRD) Section I.F	Emissions tests for the second semiannual period of 2009 were conducted and verified compliance. Reports were submitted to the Department on December 17, 2009.	The Department has added language indicating that WBI has submitted the emissions test report for the second semiannual period of 2009 that demonstrate compliance with the emission limits.
TRD Section II.B	EU018 MISC 1 should have glycol removed from its description as this is a dry sorbead dehydration process rather than TEG glycol.	The Department has made the requested change.
TRD Section II.C	Add the following sources to the table; 0.03 MMBtu/hr Reliance 501 water heater, 0.07 MMBtu/hr Siegler 550 UN-24 heater, and a 0.07 MMBtu/hr Janitrol heater	The Department has added the requested items to the table.

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Section IV of the operating permit “Non-applicable Requirements” contains the requirements that the Department determined were non-applicable. The following paragraphs summarize the requirements that WBI identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

40 CFR 60 Subpart A – Standards of Performance for New Stationary Sources contains general provisions that apply to the owner or operator of any stationary source which contains an affected facility. The Cabin Creek Compressor Station contains equipment that qualifies it as an affected facility; therefore, 40 CFR 60 Subpart A applies.

40 CFR 60 Subpart GG – Standards of Performance for Stationary Gas Turbines applies to stationary gas turbines with a heat input at peak load equal to or greater than 10 MMBtu/hr that commenced construction, modification, or reconstruction after October 3, 1977. EU015, a 1,149 hp Solar Saturn Mark II gas turbine, is an affected source under this subpart; therefore, 40 CFR 60 Subpart GG applies to this unit.

40 CFR 60 Subpart KKKK – Standards of Performance for Stationary Gas Turbines is not applicable to the turbines at the Cabin Creek Compressor Station at this time because they were manufactured and installed before the applicable date outlined in the subpart. However, future turbine installations or replacements may be subject to 40 CFR 60 Subpart KKKK.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines is not applicable to the engines at the Cabin Creek Compressor Station at this time because they were manufactured and installed before the applicable dates outlined in the subpart. However, future engine installations or replacements may be subject to 40 CFR 60 Subpart JJJJ.

40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines does not apply to the engines installed at the Cabin Creek Compressor Station at this time because the station is not a major source of HAPs. Subpart ZZZZ defines a major source of HAPs as a plant site that emits or has the potential to emit any single HAP at a rate of 10 TPY or more or any combination of HAPs at a rate of 25 TPY or more. An area source of HAP is defined as a source with HAP emissions that is not a major source. Subpart ZZZZ does have requirements for certain engines at area sources of HAPs. The Cabin Creek Compressor station is an area source for HAPs; therefore, 40 CFR 63 Subpart ZZZZ may have applicability on future engine replacements or installations.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

As of the draft issuance date of Operating Permit #OP2484-02, 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines could potentially be applicable to this facility in the future.

B. NESHAP Standards

As of the draft issuance date of Operating Permit #OP2484-02, the Department is unaware of any future NESHAP rules that may be promulgated that will affect this facility.

C. NSPS Standards

As of the draft issuance date of Operating Permit #OP2484-02, 40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines could potentially be applicable to this facility in the future. Turbines currently subject to 40 CFR 60, Subpart GG would be subject to 40 CFR 60, Subpart KKKK Standards of Performance for Stationary Combustion Turbines if they undergo modification, replacement, or reconstruction. Units that become subject to 40 CFR 60, Subpart KKKK will then cease to be subject to 40 CFR 60, Subpart GG. 40 CFR 60, Subpart KKKK could potentially be applicable to any turbine at this facility if they undergo modification, replacement, or reconstruction.

D. Risk Management Plan

As of this date (11/25/09), this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than June 21, 1999; 3 years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.

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 CAM Plan for that unit:

- The emitting unit is subject to an emission limitation or standard for the applicable regulated air pollutant;
- 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 are greater than major source thresholds.

EU001 at the Cabin Creek Compressor Station meets the criteria listed in ARM 17.8.1503 and therefore requires a CAM plan. Unit EU001 uses an NSCR pollution control device to reduce its NO_x and CO emissions and potential pre-control CO emissions are greater than the major emitting unit threshold of 100 tons per year. The CAM supplied by WBI can be found in Appendix E of #OP2484-02.