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

WBI Energy Transmission, Inc.
Cabin Creek Compressor Station
SE¼ of SE¼, 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		2484-06
New Source Performance Standards (NSPS)	X		40 CFR 60, Subpart GG and JJJJ
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)	X		40 CFR 63, Subpart ZZZZ
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		

TABLE OF CONTENTS

SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original Title V application submitted by Williston Basin Interstate Pipeline Company (WBIP) on June 12, 1996; Title V renewal applications and supporting documents submitted on January 30, 2003, February 3, 2003, and September 23, 2008; and Title V significant modification application and additional correspondence submitted on February 15, 2011, February 25, 2011, and March 14, 2011. 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, June 3, 2003, and May 3, 2011; and an Administrative Amendment (AA) request date December 10, 2012.

B. Facility Location

WBI Energy Transmission, Inc. (WBI) owns and operates the Cabin Creek Compressor Station. This facility is located in the SE¼ of SE¼ 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 (MAQP)

On May 31, 1988, WBIP was issued an MAQP for the operation of the Cabin Creek Compressor Station consisting of 16 natural gas compressor engines, located in the SW¼, SE¼, Section 16, Township 10 North, Range 58 East, Fallon County, Montana. The application was assigned **MAQP #2484-00**.

On July 17, 1992, WBIP 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) Best Available Control Technology (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, WBIP 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, WBIP 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.

WBIP 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 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, WBIP was issued a permit for the installation and operation of an 1149 hp capacity natural gas-fired turbine. WBP is a major stationary source of emissions as defined under the NSR/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, WBIP 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 WBIP, and in accordance with the Department's "Monitoring Requirements" guidance document (October 9, 1998), the WBIP facility, as initially proposed, was required to conduct ambient monitoring because the modeled NO_x concentration was above 95% of the ambient standard.

Subsequently, WBIP 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, WBIP 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 WBIP requires semiannual testing for this unit. Therefore, at the request of WBIP 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 MAQP #2484-02.

On August 7, 2003, WBIP submitted a letter of application for a modification to MAQP #2484-03. WBIP 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 WBIP. The changes made to the emissions inventory do not affect substantive provisions of the permit. **MAQP #2484-04** replaced MAQP #2484-03.

On February 18, 2011, the Department received a combined MAQP and Title V modification application for the facility. WBIP requested that five compressor engines (Units #4 through #8) be removed from the permit and be replaced with a one Caterpillar G3606LE compressor engine (Unit #17). The Caterpillar G3606LE is a four-stroke lean burn engine (4SLB) equipped with an oxidation catalyst and with a maximum rated design capacity of 1,775 hp (maximum site rating of 1,714 hp). Also included in this project was an upgrade in the facility heating system involving the removal of a 0.819 MMBtu/hr, a 0.770 MMBtu/hr, and a 1.18 MMBtu/hr natural gas boiler and replacement with two new 1.5 MMBtu/hr natural gas boilers. The 1.18 MMBtu/hr boiler was incorrectly labeled in earlier permits as a 1.47 MMBtu/hr boiler. Unit identification numbers were changed to match the designations as listed in the February 18, 2011 application. **MAQP #2484-05** went final May 3, 2011 and replaced MAQP #2484-04.

On December 10, 2012, the Department received an AA request from WBI to change the official name of the company from Williston Basin Interstate Pipeline Company to WBI Energy Transmission, Inc. MAQP #2484-06 replaced MAQP #2484-05

Title V Operating Permit

On June 12, 1996, WBIP 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 WBIP. 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.

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 stated that there had 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 Title V Operating Permit #OP2484-01. This permitting action established a CAM plan for EU001 because it met the requirement conditions of ARM 17.8.1513. **Title V Operating Permit #OP2484-02** became final and effective on March 20, 2010 and replaced Title V Operating Permit #OP2484-01.

On February 18, 2011, the Department received a combined MAQP and Title V permit modification application for the facility. WBIP requested that five compressor engines (Units #4 through #8) be removed from the permit and be replaced with a one Caterpillar G3606LE compressor engine (Unit #17). The Caterpillar G3606LE is a 4SLB engine equipped with an oxidation catalyst and with a maximum rated design capacity of 1,775 hp (maximum site rating of 1,714 hp). Also included in this project was an upgrade in the facility heating system involving the removal of a 0.819 MMBtu/hr, a 0.770 MMBtu/hr, and a 1.18 MMBtu/hr natural gas boiler and replacement with two new 1.5 MMBtu/hr natural gas boilers. The 1.18 MMBtu/hr boiler was incorrectly labeled in earlier permits as a 1.47 MMBtu/hr boiler. Unit identification numbers were changed to match the designations as listed in the February 18, 2011 application. **Title V Operating Permit #OP2484-03** replaced Title V Operating Permit #OP2484-02.

D. Current Permit Action

On December 10, 2012, the Department received an AA request from WBI to change the official name of the company from Williston Basin Interstate Pipeline Company to WBI Energy Transmission, Inc. **Title V Operating Permit #OP2484-04** replaces title V Operating Permit #OP2484-03.

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?
	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 May 26, 2011; the facility was in compliance with all the applicable requirements. The most recent semiannual stack test reports were reviewed on May 18, 2011, and all tested units were in compliance.

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 10 compressor engines and turbines. The Standard Industrial Classification (SIC) for this facility is "Natural Gas Transmission" which has an SIC Code of "4922".

B. Emission 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
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	1775 hp Caterpillar G3606LE Engine	Oxidation catalyst
GEN1	559 hp Waukesha 3521GL Reciprocating Engine	None
MISC1	15.25-MMBtu/hr Fired (Dehy) Regenerator Heater	None

NOTES:
MMBtu/hr Million British thermal units per hour

C. Categorically Insignificant Sources/Activities

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

Emissions Unit ID	Description
MISC2	1.5 MMBtu/hr boiler
MISC3	1.5 MMBtu/hr boiler
MISC4	0.450 MMBtu/hr Eclipse Heater Model D-6
MISC5	Tanks (contain hydrocarbon condensate, gasoline, diesel, alcohol, slop oil, ethylene glycol, and odorant)
MISC6	0.03 MMBtu/hr Reliance 501 water heater
MISC7	0.07 MMBtu/hr Siegler 550 UN-24 heater
MISC8	0.07 MMBtu/hr Janitrol heater
FUG1	Fugitive emissions from valves, flanges, open-ended lines, compressor seals, etc.

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.

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 BACT determinations that were established by the Department.

40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines was revised in 2010 with new compliance requirements for existing engines at area sources of HAP. Units EU001, EU009, EU010, and Gen1 are now subject to this subpart and must be in compliance with the applicable standards by October 19, 2013.

The 1,775 hp Caterpillar G3606LE (EU017) is limited to 0.70 g/bhp-hr and 2.74 lb/hr for NO_x, 0.18 g/bhp-hr and 0.70 lb/hr for CO, and 0.30 g/bhp-hr and 1.17 lb/hr for VOC. The emissions limits are based on BACT determinations that were established by the Department. Emission limits are presented in multiple units because 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines, which EU017 is subject to, requires compliance with a g/bhp-hr emission factor and lb/hr units are necessary for emission inventory reporting purposes. 40 CFR 63, Subpart ZZZZ is also applicable to EU017.

The 559 hp Waukesha Generator Engine (GEN1) 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 emission 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 an insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

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

C. Test Methods and Procedures

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 #OP2484-04 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 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 and g/bhp-hr emission rate as necessary. 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 5 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.

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 applicable to EU017. Future engine installations or replacements may also 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 was updated in 2010 with varied compliance dates for affected units at area sources. The Cabin Creek Compressor Station is considered an area source for HAP emissions. Units EU001, EU009, EU010, and Gen1are considered existing sources at an area source since their initial construction commenced before June 12, 2006; therefore, as affected units they must demonstrate compliance with these standards by October 19, 2013. EU17 is a new source affected by this subpart and is required to comply by meeting the requirements of 40 CFR 60 Subpart JJJJ. 40 CFR 63 Subpart ZZZZ may have applicability on future engine replacements or installations as well.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines could be applicable to future engine installations at this facility.

B. NESHAP Standards

As of the draft issuance date of Title V Operating Permit #OP2484-04, the Department is unaware of any future NESHAP rules that may be promulgated that will affect this facility.

C. NSPS Standards

40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines could be applicable to future engine installations at this facility. 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 draft issuance date of Title V Operating Permit #OP2484-04, 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 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 emissions and potential pre-control NO_x 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 Title V Operating Permit #OP2484-04.

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 WBI, Cabin Creek Compressor Station's potential emissions fall below the GHG major source threshold of 100,000 TPY of CO_2e for both Title V and PSD under the Tailoring Rule.