

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
OPERATING PERMIT #OP2814-02 TECHNICAL REVIEW DOCUMENT**

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

Williston Basin Interstate Pipeline Company  
Vida Compressor Station  
N½ of NE¼ of Section 27, Township 25 North, Range 49 East, in McCone County  
P.O. Box 131  
Glendive, MT 59330

The following table summarizes the air quality programs testing, monitoring, and reporting requirements applicable to this facility.

<b>Facility Compliance Requirements</b>	Yes	No	Comments
Source Tests Required	X		Portable Analyzer, Method 9
Ambient Monitoring Required		X	
Continuous Opacity Monitoring System (COMS) Required		X	
Continuous Emission Monitoring System (CEMS) Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
<b>Applicable Air Quality Programs</b>			
Administrative Rules of Montana (ARM) Subchapter 7 – Montana Air Quality Permit	X		#2814-02
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
Major New Source Review (NSR) – 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

TABLE OF CONTENTS

**SECTION I. GENERAL INFORMATION..... 3**

A. PURPOSE..... 3

B. FACILITY LOCATION ..... 3

C. FACILITY BACKGROUND INFORMATION ..... 3

D. CURRENT PERMIT ACTION ..... 5

E. TAKING AND DAMAGING ANALYSIS..... 5

F. COMPLIANCE DESIGNATION ..... 6

**SECTION II. SUMMARY OF EMISSION UNITS ..... 7**

A. FACILITY PROCESS DESCRIPTION ..... 7

B. EMISSION UNITS AND POLLUTION CONTROL DEVICE IDENTIFICATION ..... 7

C. CATEGORICALLY INSIGNIFICANT SOURCES/ACTIVITIES (ALSO KNOWN AS INSIGNIFICANT  
EMITTING UNITS (IEUS))..... 7

**SECTION III. PERMIT CONDITIONS ..... 8**

A. EMISSION LIMITS AND STANDARDS ..... 8

B. MONITORING REQUIREMENTS ..... 8

C. TEST METHODS AND PROCEDURES..... 9

D. RECORDKEEPING REQUIREMENTS ..... 9

E. REPORTING REQUIREMENTS ..... 9

F. PUBLIC NOTICE ..... 9

G. DRAFT PERMIT COMMENTS ..... 9

**SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS ..... 12**

**SECTION V. FUTURE PERMIT CONSIDERATIONS ..... 13**

A. MACT STANDARDS ..... 13

B. NESHAP STANDARDS ..... 13

C. NSPS STANDARDS ..... 13

D. RISK MANAGEMENT PLAN ..... 13

E. CAM APPLICABILITY ..... 13

## 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 operating permit application submitted by Williston Basin Interstate Pipeline Company (WBI) and received on June 12, 1996; a renewal application received on February 13, 2003; a renewal application received on September 23, 2008; the initial Montana Air Quality Permit (MAQP) issued June 21, 1994; and an MAQP modification letter dated September 16, 2003.

### B. Facility Location

WBI owns and operates the Vida Compressor Station. This facility is located in the N½ of NE¼ of Section 27, Township 25 North, Range 49 East, in McCone County, Montana. McCone County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Vida Compressor Station is located in a remote area 8 miles northeast of Vida, Montana. The adjacent land is used for grain cropland and rangeland. The nearest residence is WBI employee housing located adjacent to the facility.

### C. Facility Background Information

#### Montana Air Quality Permit

The Vida Compressor Station was constructed by the Montana Dakota Utilities Company (MDU), WBI's predecessor, beginning in 1978 and ending in 1979. This facility originally had two 600 horsepower (hp) Ajax DPC-600 engines with two additional 600 hp Ajax DPC-600 engines being added in 1979.

The Vida Compressor Station was constructed by WBI's predecessor, MDU, as one planned project, but in two construction phases, between April 1978 and April 1979. MDU filed docket #CP75-154 with the Federal Energy Regulatory Commission (FERC) on November 20, 1974, which requested authority to construct and operate a natural gas compressor station for the transportation of natural gas from the Bowdoin Field near Saco to storage at the Cabin Creek, Montana storage area and to further sales destinations.

WBI was issued a FERC certificate on May 11, 1977, to construct and operate those facilities identified in docket #CP75-154. Originally, 3 - 1200 hp Solar Saturn compressor engines were proposed to be installed over a two-year period. Construction was to begin in 1976 near Richey, Montana, but the FERC certificate was not issued until May 11, 1977, and equipment contracts had not been initiated beforehand. For this reason the project was delayed and during this time the construction plans were changed.

During the delay, WBI determined that it could perform the required services with three Ajax DPC-540 compressors and one Ajax DPC-360 compressor, for a total of 1980 hp. The proposed station was relocated from near Richey, Montana to Vida, Montana and the Vida station was planned to be built with the first two compressor engines being installed in 1978. In 1976, Ajax was marketing the DPC-540 compressor with a nameplate rating of 540 hp. Subsequent to 1976, and before WBI's

order was placed, Ajax modified and updated the DPC-540 and it became the DPC-600 reciprocating internal combustion engines (RICE) with a nameplate rating of 600 hp. The DPC-540 was no longer offered or available. Due to this reason, two 600 hp Ajax DPC-600 RICE were ordered and installed as EU001 and EU002, instead of the originally planned compressor engines.

The purchase order for EU001 and EU002 was issued on September 13, 1977, with a no charge cancellation date of January 15, 1978. The actual on-site construction of the Vida station began on April 10, 1978, with the pouring of the concrete pads for all four compressor engines. The erection of the compressor building, installation of EU001 and EU002, and addition of the other associated equipment followed shortly thereafter. Work on phase one of this project was completed by October 27, 1978.

In the second construction phase the following year, two additional compressor engines were to be installed. In addition to the installation of the latter two engines, other construction activities on the mainline and at existing stations had to be completed to allow WBI to increase capacity on the mainline.

Installing all four compressor engines in 1978 would have been unproductive because the pipeline capacity was limited to the operating pressure of the existing pipeline and only two engines were required to achieve the potential pipeline capacity in 1978. Only after additional construction work upgrading certain pipeline segments and the installation of two additional compressor engines at Saco were Vida compressor engines EU003 and EU004 finally required. Due to the manufacturer's modification/upgrading of its 540 hp compressor engines, two 600 hp Ajax DPC-600 RICE were ordered and installed as EU003 and EU004, instead of the originally planned compressor engines.

The purchase order for EU003 and EU004 was issued on March 31, 1978, with no capital expenditure until April 1979. The actual installation of EU003 and EU004 was on April 20, 1979, and the entire project was completed by October 8, 1979. The completed Vida compressor station had estimated potential nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) emissions of 300 and 70 tons per year, respectively. The completed Vida compressor station provided a capacity of 14 million cubic feet per day (MMCFD) in the summer and 17 MMCFD in the winter.

In May 1993, WBI had an emission source test conducted to determine the NO<sub>x</sub> and CO emissions from EU002 compressor engine (Ajax DPC-600 RICE, Serial #75553). The results of the source test, based on averaging the 3 tests, were 11.87 pounds per hour (lb/hr) (10.323 grams per brake horsepower hour (g/bhp-hr)) for NO<sub>x</sub> and 2.74 lb/hr (2.382 g/bhp-hr) for CO.

On June 21, 1994, WBI was issued **MAQP #2814-00** for the operation of the Vida Compressor Station and associated equipment.

On February 13, 2003, the Department of Environmental Quality (Department) received a request from WBI to modify Permit #2814-00 for the addition of low emission (LE) packages to the four Ajax DPC-600 natural gas fired RICE.

The permit action added LE packages to the four Ajax DPC-600 Engines under the provisions of ARM 17.8.745 (1). In addition, Permit #2841-02 was updated to reflect the new emission factors for Ajax DPC-600LE RICE and current Department permit format and permit language. **MAQP #2814-01** replaced MAQP #2814-00.

On September 16, 2003, the Department received a letter from WBI requesting to increase the CO limit for each of the Ajax DPC-600LE natural gas fired compressor engines from 1.59 lb/hr, proposed in error by WBI and established in Permitting Action #2814-01, to 2.44 lb/hr. Because the potential emission increase of CO emissions was less than 15 tons per year and because the existing limit was

not established through Best Available Control Technology (BACT) the Department determined that the onetime increase in the CO emission limit was excluded from requiring a permit as described in ARM 17.8.745(1)(d). The de minimis action changed the CO limit for each of the Ajax DPC-600LE natural gas fired compressor engine from 1.59 lb/hr to 2.44 lb/hr and updated the permit to reflect current permit language and rule references used by the Department. **MAQP #2814-02** replaced MAQP #2814-01.

#### Title V Operating Permit

On June 12, 1996, the Department received a Title V Operating Permit application from WBI for the Vida Compressor Station. **Title V Operating Permit #OP2814-00** was issued final and effective on August 23, 1998.

On June 24, 2003, the Department received a Title V Operating Permit renewal application from WBI for the Vida Compressor Station. The application reflected the recent modification at the facility to retrofit the four Ajax DPC-600 natural gas-fired compressor engines with LE packages for the purposes of improving fuel economy and reducing the NO<sub>x</sub> emissions. The permit application was deemed administratively complete on July 24, 2003 and technically complete on September 29, 2003. **Operating Permit #OP2814-01** became final and effective on March 26, 2004, and replaced #OP2814-00.

#### **D. Current Permit Action**

The current permit action is a renewal of WBI's Title V Operating Permit for the Vida Compressor Station. On September 23, 2008, the Department received a Title V Operating Permit renewal application from WBI for the Vida Compressor Station. The renewal 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 Operating Permit #OP2814-01. EU005 – Various Oil and Ethylene Glycol Tanks was changed from a significant emitting unit to an insignificant emitting unit because they are not subject to an applicable requirement (other than general requirements) and WBI provided documentation that predicted the potential to emit less than five tons per year of any regulated pollutant. **Operating Permit #OP2814-02** replaces #OP2814-01.

#### **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 Montana Code Annotated (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 Vida Compressor Station on October 15, 2008; the facility was in compliance with all the applicable requirements.

## SECTION II. SUMMARY OF EMISSION UNITS

### A. Facility Process Description

The Vida Compressor Station serves as a natural gas pipeline booster station. This facility increases the capacity of the Saco to Cabin Creek pipeline section. Natural gas gathered from the Bowdoin Field near Saco is transferred to storage at the Cabin Creek storage area and on to further sales destinations. 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

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	600 hp AJAX DPC-600LE Compressor Engine	Low Emission Packages
EU002	600 hp AJAX DPC-600LE Compressor Engine	Low Emission Packages
EU003	600 hp AJAX DPC-600LE Compressor Engine	Low Emission Packages
EU004	600 hp AJAX DPC-600LE Compressor Engine	Low Emission Packages

### 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
IEU01/MISC 1	0.130 MMBtu/hr Armstrong Model G31-130A Space Heater
IEU02/MISC 2	0.035 MMBtu/hr Warm Morning Model WFC-35A Space Heater
IEU03/MISC 3	0.030 MMBtu/hr Reliant 606 Water Heater
IEU04/FUG 1	Fugitive VOC sources consisting of 33 valves, 110 flanges, 6 open-ended lines, 8 compressor seals, and 5 pressure relief valves
IEU05/FUG 2	Various Oil and Ethylene Glycol Tanks

## SECTION III. PERMIT CONDITIONS

### A. Emission Limits and Standards

Emission limits for the 600 hp Ajax DPC-600LE engines were established under the authority of ARM 17.8.749. As written in the Vida MAQP, the emission limits for the compressor engines are required by ARM 17.8.749. Subchapter 7 of the ARM has been incorporated into the State Implementation Plan (SIP). Since the conditions in the preconstruction permit are required by a rule that is included in the SIP, the limitations in the MAQP are federally enforceable. The Department's current Title V testing schedule policy for major source compressor engines requires semiannual portable analyzer testing. Since the Vida Compressor Station is a major source with federally enforceable limitations derived from the MAQP, the Department has required semiannual testing. The 600 hp Ajax DPC-600LE engines have an emission limit of 8.60 lb/hr NO<sub>x</sub>, 2.44 lb/hr CO, and 1.19 lb/hr VOC.

The tanks that are permitted by Operating Permit #OP2814-02 are not subject to the NSPS because the tanks are relatively small. 40 CFR 60, Subparts K, Ka and Kb are not applicable to the tanks that are permitted at the Vida Compressor Station. Subparts K and Ka do not apply because they both excludes tanks that have a capacity of 40,000 gallons or less. Subpart Kb does not apply because it excludes tanks that have a capacity of 40 cubic meters or less. The remaining applicable standards that are listed in Operating Permit #OP2814-02 are consistent with other operating permits that have been issued by the Department. The emission units at this facility are not currently subject to any current MACT, NESHAP, or NSPS standards. This facility is not subject to PSD regulations.

### 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

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 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.

### F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Wolf Point Herald* newspaper on or before November 19, 2009. The Department provided a 30-day public comment period on the draft operating permit from November 19, 2009, to December 21, 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
Section I. General Information	Change Facility Contact Person to Stacy Aguirre (Phone #: 406-359-7347) and Jill Linn (Phone #: 406-359-7332)	The Department has made the requested change.
Section II. Summary of Emission Units	WBI requests that EU005, Various Oil and Ethylene Glycol Tanks, be removed from the list of significant emissions units and added to the list of Insignificant Activities in Appendix A.	The Department has removed these units from the list of significant emitting units and added them to the list of insignificant emitting units because WBI provided documentation that predicts the potential to emit less than five tons per year of any regulated pollutant.
Section III. Condition A.14	WBI requests that this condition be removed from the permit. As discussed in an email sent to Ed Warner [permit writer]	The Department concurs that as of the issuance date of this permit, 40 CFR 63, Subpart ZZZZ is not applicable to the

	<p>from Jill Linn, dated June 1, 2009, 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.</p>	<p>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.</p>
Section III. Condition B.10	<p>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.</p>	<p>The Department has reworded this section in a manner which accommodates WBI's requested change.</p>
Section III.C. Various Oil and Ethylene Glycol Tanks – EU005	<p>WBI requests that this section be removed from the permit. These tanks are not listed as significant emitting units in the permit renewal application submitted by WBI on 9/22/08. Also, the Technical Review Document (TRD) for this permit discusses the tanks at this facility and the non-applicability of any MACT, NESHAP, or NSPS. The applicable requirements pertaining to opacity in Section III.C are already addressed in Section III.A.3 of the permit.</p>	<p>The Department has removed the section and added the units to the list of insignificant emitting units because WBI provided documentation that predicts the potential to emit less than five tons per year of any regulated pollutant.</p>
Section V.E. Prompt Deviation Reporting	<p>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) 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.</p>	<p>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) 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</p>

		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	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	WBI requests that the Department add the Various Oil and Ethylene Glycol Tanks to this list as IEU05. IEU03/Misc 3 is a 0.030 MMBtu/hr Reliant 606 water heater.	The Department has updated the description of IE03/Misc 3.
TRD Section II.B	WBI requests that EU005 Various Oil and Ethylene Glycol tanks be removed from the list of significant emitting units and added to list of insignificant emitting units in Section II.C.	The Department has removed these units from the list of significant emitting units and added them to the list of insignificant emitting units because WBI provided documentation that predicts the potential to emit less than five tons per year of any regulated pollutant.
TRD Section II.C	IE03/Misc 3 is a 0.030 MMBtu/hr Reliant 606 water heater.	The Department has updated the description of IE03/Misc 3.

### Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
	No comments received	

#### SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Section IV of Operating Permit #OP2814-02 “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 JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines is not applicable to the engines at the Vida Compressor Station at this time because they were manufactured and installed before the applicable dates outlined in the subpart. However, future engine installations, replacements, or reconstructions 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 Vida Compressor Station at this time because the station is not a major source of HAPs and the engines meet the exemption requirements for existing units at area sources 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 Vida Compressor station is an area source for HAPs; therefore, 40 CFR 63 Subpart ZZZZ may have applicability on future engine replacements, installations, or reconstructions.

## SECTION V. FUTURE PERMIT CONSIDERATIONS

### A. MACT Standards

As of the issuance date of Draft Operating Permit #OP2814-02, 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 issuance date of Draft Operating Permit #OP2814-02, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

### C. NSPS Standards

As of the issuance date of Draft Operating Permit #OP2814-02, 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.

### 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

The emitting units at the Vida Compressor Station do not meet the criteria listed in ARM 17.8.1503 and therefore do not trigger CAM. The compressor engines do not use a control device to achieve compliance with their emission limitations or to reduce their cumulative potential emissions to a level less than that which would exclude them from being designated as a major source of emissions.