

**MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT**

**Permitting and Compliance Division
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**Northern Border Pipeline Company
Compressor Station No. 3
NE¹/₄ of the NE¹/₄, of Section 6, Township 28 North, Range 57 East
Roosevelt County, Montana**

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	xx		Portable Analyzer
Ambient Monitoring Required		xx	
COMS Required		xx	
CEMS Required		xx	
Schedule of Compliance Required		xx	
Annual Compliance Certification and Semiannual Reporting Required	xx		
Monthly Reporting Required		xx	
Quarterly Reporting Required		xx	
Applicable Air Quality Programs			
ARM Subchapter 7 – Montana Air Quality Permit (MAQP)	xx		MAQP #2974-02
New Source Performance Standards (NSPS)	xx		40 CFR 60, Subpart GG
National Emission Standards for Hazardous Air Pollutants (NESHAPS)		xx	
Maximum Achievable Control Technology (MACT)		xx	
Major New Source Review (NSR) – includes Prevention of Significant Deterioration (PSD) and/or Non-attainment Area (NAA) NSR		xx	
Risk Management Plan Required (RMP)		xx	
Acid Rain Title IV		xx	
Compliance Assurance Monitoring (CAM)		xx	
State Implementation Plan (SIP)	xx		General SIP

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SECTION I: GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emissions units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the change of Responsible Official notice received March 25, 2009, and Title V Renewal application received by the Department of Environmental Quality (Department) on May 5, 2009.

B. Facility Location

Northern Border Pipeline Company (NBPL) owns and operates the Compressor Station No. 3. This facility is located in the NE¼ of the NE¼ of Section 6, Township 28 North, Range 57 East, in Roosevelt County, Montana. This site is approximately 4 miles north of Culbertson, Montana. The total property area covered by this facility is 20 acres. Roosevelt County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants.

C. Facility Background Information

Montana Air Quality Permit History

Montana Air Quality Permit (MAQP) #2974-00 was issued to NBPL for the operation of a natural gas turbine and associated equipment located in the NE¼ of the NE¼ of Section 6, Township 28 North, Range 57 East, in Roosevelt County. This facility is known as Compressor Station No. 3 and includes one 40,350-horsepower (hp) Cooper Rolls natural gas turbine, one 300-kilowatt (kW) emergency backup generator engine, one 1.706-MMBtu/hr heating boiler, and one 15-kW Onan emergency backup generator.

On February 21, 2001, the Department received a request from NBPL for a revision of MAQP #2974-00 to alter the custom fuel monitoring schedule and equipment for Compressor Station No. 3 located in Roosevelt County, Montana. The chromatograph was replaced with a hydrogen sulfide (H₂S) and Total Sulfur Analyzer and the custom fuel schedule was structured to allow a representative sample to be recorded every 2 weeks with an option of extending the sampling schedule to once every 6 months as approved by the Department. **MAQP #2974-01** replaced MAQP #2974-00.

On March 16, 2004, the Department received a complete permit application from NBPL for changes to MAQP #2974-01. The changes include a modification to the original oxides of nitrogen (NO_x) Best Available Control Technology (BACT) determination by the Department. NBPL Source #01 (40,350-hp) natural gas turbine) was unable to operate the dry low NO_x combustion system (DLE), determined by the Department to be BACT, every hour and at all conditions for which the turbine operates. The modification allowed NBPL to operate Source #01 up to 750 hours per year while the DLE was not in operation. Reasons for non-DLE operation shall include only start-up and shutdown, when operation is required during downstream maintenance requirements, and operation during low ambient temperatures at the site. New carbon monoxide (CO) emissions limits for Source #01 of 460 pounds per hour (lb/hr) when the ambient temperature is 20 degrees Fahrenheit (°F) or colder, 56 lb/hr when the ambient temperature is 20°F or warmer, and 109.5 tons per rolling 12-month time period replaced Section II.A.2 that limited the operation of Source #01 to running at 80% or greater

load when the ambient temperature is below 5°F. The new 109.5 tons per year CO limit was made enforceable by monitoring a combination of ambient and turbine parameters. Cooper-Rolls, the manufacturer of the turbine, will test the turbine under different operating scenarios to develop a correlation between the monitored parameters and CO emissions. **MAQP #2974-02** replaced MAQP #2974-01.

Title V Operating Permit History

On December 23, 1996, NBPL submitted a complete permit application to construct and operate Compressor Station No. 3 in Roosevelt County, Montana. This facility consists of one 40,350-hp Cooper-Rolls, 6562-DLE Coberra; one 245-kW emergency backup generator engine; one 1.706-MMBtu/hr hydronic boiler; and one 15-kW emergency backup generator. The application stated the estimated start date as August 1997 and the estimated completion date as November 1998. An MAQP was issued for this facility on March 9, 1997. This facility had the potential to emit greater than 100 tons per year of NO_x and was therefore required to obtain an Operating Permit. This facility was an NSPS Subpart GG affected source because the Cooper-Rolls Coberra met the definition of a stationary gas turbine and was manufactured after October 3, 1997. The Cooper-Rolls Coberra was required to have an internal dry low NO_x combustion as its control device, which constitutes BACT for this facility. **Operating Permit #OP2974-00** was issued final and effective September 10, 1998.

On February 21, 2001, the Department received a request from NBPL for a revision of MAQP #2974-00 and Operating Permit #OP2974-00 to alter the custom fuel monitoring schedule and equipment for Compressor Station No. 3 located in Roosevelt County, MT. The chromatograph was replaced with an H₂S and Total Sulfur Analyzer and the custom fuel schedule was structured to allow a representative sample to be recorded every 2 weeks with an option of extending the sampling schedule to once every 6 months as approved by the Department. **Operating Permit #OP2974-01** replaced Operating Permit #OP2974-00.

On October 9, 2001, the Department received a request from NBPL for a modification to Operating Permit #OP2974-01. The modification was an administrative amendment, which changed the responsible official for the facility. **Operating Permit #OP2974-02** replaced Operating Permit #OP2974-01.

On February 3, 2003, the Department received a request from NBPL for a modification to Operating Permit OP2974-02. The modification was an administrative amendment, which changed the responsible official and the corporate office address for the facility. **Operating Permit #OP2974-03** replaced Operating Permit #OP2974-02.

On February 3, 2003, the Department received a request from NBPL for a modification to Operating Permit #OP2974-03. The modification was an administrative amendment. The responsible official's name was changed in error on Operating Permit #OP2974-03. Operating Permit #OP2974-04 changed the responsible official from Jay Muschenheim back to Randy Rice and changed the facility contact from Ruth Jensen to Jay Muschenheim. **Operating Permit #OP2974-04** replaced Operating Permit #OP2974-03.

On October 17, 2003, the Department received a request from NBPL for an administrative amendment of Operating Permit #OP2974-04 to update Section V.B.3 of the General Conditions incorporating changes to federal Title V rules 40 CFR 70.6(c)(5)(iii)(B) and 70.6(c)(5)(iii)(C) (to be incorporated into Montana's Title V rules at ARM 17.8.1213) regarding Title V annual compliance certifications. **Operating Permit #OP2974-05** replaced Operating Permit #OP2974-04.

On March 11, 2003, the Department received a renewal application from NBPL. The Department had been in the process of permitting action #2974-02 and waited until the completion of permitting action #2974-02 to proceed with the renewal. MAQP #2974-02 was final June 18, 2004. **Operating Permit #OP2974-06** replaced Operating Permit #OP2974-05.

On December 6, 2004, the Department received a request from NBPL for an administrative amendment to Operating Permit #OP2974-06. The administrative amendment changed the responsible official from Randy Rice to Michel E. Nelson. **Operating Permit #OP2974-07** replaced Operating Permit #OP2974-06.

On April 9, 2007, the Department received a request from NBPL for an administrative amendment to Operating Permit #OP2974-07. The administrative amendment changed the responsible official from Michel E. Nelson to Jim Krause. **Operating Permit #OP2974-08** replaced Operating Permit #OP2974-07.

D. Current Permit Action

The current permit action renews NBPL's Title V Operating Permit. On March 25, 2009, the Department received a request from NBPL for an administrative amendment to Operating Permit #OP2974-08 to change the responsible official from Jim Krause to Jeff Gravelle. The Department did not issue an Administrative Amendment in anticipation of receiving a Title V Renewal Application. The Renewal Application for NBPL's Title V Operating Permit was received on May 5, 2009. The current permit action renews NBPL's Title V Operating Permit, incorporates the change of the Responsible Official, and updates the permit to the current format used by the Department. Some of the changes include updates to general permit conditions, facility wide conditions, identification of the emergency generator by horsepower instead of electrical generation, and minor changes on the information required for recording during testing. NBPL's **Operating Permit #OP2974-10** replaces Operating Permit #OP2974-08. The numbering skips from -08 to -10 to designate that the Department is combining the responsible official change request and the renewal application into one permitting action.

Note: On August 21, 2008, the Department received a request for concurrence that no permit modifications would be needed for a waste heat recovery and electrical generation facility on an easement on the facility property. The project would recover the waste heat from the exhaust from the turbine to produce electrical power. The Department determined that while several stack parameters would change as a result, including stack height, stack diameter, and stack exhaust temperature, none of these changes would violate an existing condition in the permit, nor would these changes affect air pollutant emissions. Therefore, this action did not prompt an amendment to the permit at that time. No changes in the Title V Operating Permit from this de minimis action are required in this permitting action.

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	
xx		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	xx	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	xx	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	xx	4. Does the action deprive the owner of all economically viable uses of the property?
	xx	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?
	xx	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	xx	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?
	xx	7a. Is the impact of government action direct, peculiar, and significant?
	xx	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	xx	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?
	xx	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 facility was inspected on May 26, 2005. Based on the results of the inspection, the facility appeared to be in compliance with all applicable requirements.

The facility was again inspected July 17, 2007. The inspection report acknowledged a violation letter was issued to NBPL on April 27, 2006, for a violation of the permitted NO_x emission limit that occurred during a compliance test. The issue was resolved with the Department through an Administrative Order on Consent (AOC) that was finalized on October 4, 2006. The inspection report indicated that subsequent compliance tests completed on the Cooper-Rolls Coberra 6562-DLE Turbine since the failed compliance test have shown compliance with the emission limits.

On April 9, 2009, the facility was inspected. No compliance issues were noted.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

The NBPL Compressor Station No. 3 is a natural gas pipeline transmission station with one Cooper-Rolls Coberra, natural gas fired turbine. A hot water boiler provides the heat to the various station facilities.

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 NBPL Compressor Station No. 3 application identified one 40,350 hp Cooper-Rolls Coberra 6562 Compressor Turbine, one 350 bhp emergency backup generator engine, and one 1.67-MMBtu/hr hydronic boiler.

The Cooper-Rolls Coberra is equipped with a dry low NO_x combustion system as part of the turbine design. This design and operating practice constitutes BACT for this facility. No pollution control devices exist on the emergency backup generator engine or the hydronic boiler.

C. Categorically Insignificant Sources/Activities

The Administrative Rules of Montana ((ARM) 17.8.120 (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, and is not regulated by an applicable requirement other than a generally applicable requirement.

This facility has a 1.67-MMBtu/hr Hydronic Boiler, used for heating buildings and fuel preheat as needed. This boiler meets the definition of an insignificant emissions unit.

Emissions Unit ID	Description
IEU01	1.67-MMBtu/hr natural gas fired heater boiler
IEU02	In-plant vehicle traffic
IEU03	Fugitive and Miscellaneous emissions

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Emission limits for the 40,350 hp Cooper-Rolls Coberra Compressor Turbine were established by a BACT determination under the authority of ARM 17.8.715 (the predecessor to ARM 17.8.752). The compressor turbine has an emission limit of 40 ppm_{v,d}, 51.5 lb/hr and 78 lb/hr for NO_x; 460 lb/hr, 56 lb/hr, and 109.5 ton per rolling 12-month time period for CO; and 3.00 lb/hr for volatile organic compounds (VOC). Sulfur content in the fuel shall not exceed 0.08% by weight and sulfur dioxide content in the fuel shall not exceed 0.015% by volume at 15% oxygen on a dry basis. The emergency generator engine is limited to 500 hours of operation per year in order to comply with the EPA definition of an "emergency back up generator." The permit further requires the emergency generator to operate only as necessary for emergency use or maintenance related operation.

NBPL shall comply with all applicable standards, limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart GG unless otherwise specified (ARM 17.8.340 and 40 CFR Part 60).

The emission units at this facility are not subject to any current MACT or NESHAP standards. This facility is not currently 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 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

NBPL shall conduct an emissions test with a portable analyzer in order to determine the NO_x emissions from the turbine once every 6 months. The portable analyzer shall be capable of achieving performance specifications equivalent to EPA traditional methods defined in 40 CFR 60, Appendix A, or shall be capable of meeting the requirements of EPA Conditional Test Method 022 for the "Determination of Nitric Oxide, Nitrogen Dioxide, and NO_x Emissions from Stationary Combustion Sources by Electrochemical Analyzer." NBPL shall monitor compliance with the NO_x and CO

limitations by converting the emissions test results (ppm) to a mass emissions rate (lb/hr). Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A. NBPL may use another testing procedure as approved in advance by the Department (ARM 17.8.105 and ARM 17.7.106).

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 *Searchlight* newspaper on or before June 28, 2010. The Department provided a 30-day public comment period on the draft operating permit from June 28, 2010, to July 28, 2010. 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 July 28, 2010, 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 NBPL so they may have an opportunity to respond to these comments as well.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response

G. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response

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 table summarizes the requirements that NBPL identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Applicable Requirement	Reason
ARM 17.8.310 - Particulate Matter, Industrial Process	These regulations may not be applicable to the facility at this time, however, it may become applicable during the life of the permit.
ARM 17.8.322 – Sulfur Oxide Emission – Sulfur in Fuel	
ARM 17.8.324 – Hydrocarbon Emissions – Petroleum Products	
ARM Subchapter 6 – Open Burning	
40 CFR Part 61 – National Emissions Standards for Hazardous Air Pollutants (NESHAP)	None of the 40 CFR Part 61 NESHAP are currently applicable to this facility. However, the Department has determined that it is inappropriate to shield this source category from these rules.
40 CFR 63, Subpart HH – Oil and Natural Gas Production Facilities	Subpart HH applies to oil and natural gas production facilities that are major or area sources of HAP. Compressor Station No. 3 is an area source of HAPs. For area sources, the affected source includes each triethylene glycol (TEG) dehydration unit located at a facility that meets the criteria specified in paragraph (a) of this section. NBPL does not have a TEG dehydration unit at this facility; therefore, there are no applicable requirements of this rule at this time. However, the Department has determined that it is inappropriate to shield this source category from these rules.
40 CFR 63, Subpart HHH – Natural Gas Transmission and Storage Facilities	Subpart HHH applies to natural gas transmission and storage facilities that are a major source of HAPs and that transport or store natural gas prior to entering a pipeline to a local distribution company or to a final end user. As noted in 40 CFR 63.1270(b), the affected source under the regulation is glycol dehydration units. 40 CFR 63.1270(c) states that a facility that does not contain an affected source is not subject to the requirements of the Subpart. Compressor Station No. 3 does not have any glycol dehydration units; therefore, this regulation does not currently apply. However, the Department has determined that it is inappropriate to shield this source category from these rules.
40 CFR 63, Subpart YYYY – Stationary Combustion Turbines	Subpart YYYY currently applies to stationary combustion turbines that are located at a major source of HAPs. Compressor Station No. 3 is currently not a major source of HAPs. However, the Department has determined a shield to this source category from these rules to be inappropriate.
40 CFR 64 – Compliance Assurance Monitoring	<p>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:</p> <ul style="list-style-type: none"> • The emitting unit is subject to an emission limitation or standard for the applicable regulated air pollutant (other than emission limits or standards proposed after November 15, 1990, since these regulations contain specific monitoring requirements); • The emitting unit uses a control device to achieve compliance with such limit; and • The emitting unit has potential pre-control device emissions of the applicable regulated air pollutant that are greater than major source thresholds.

	<p>NBPL does not currently have any emitting units that meet all the applicability criteria in ARM 17.8.1503, and is therefore not currently required to develop a CAM Plan.</p> <p>However, the Department does not shield this source category from these rules.</p>
40 CFR 60, Subpart JJJJ – Spark-Ignition Internal Combustion Engines	<p>Subpart JJJJ applies to emergency engines that are manufactured on or after January 1, 2009. The natural gas fired emergency generator engine was constructed in 1998; therefore, Subpart JJJJ does not currently apply to the generator engine. However, the Department has determined a shield from these requirements to be inappropriate.</p>
40 CFR 63, Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines	<p>As stated in 40 CFR 63.6590(b)(3), an existing spark ignition 4-stroke lean-burn engine and an existing emergency stationary reciprocating internal combustion engine do not have to meet the requirements of this subpart and of subpart A of 40 CFR Part 63. However, the Department has determined a shield from these requirements to be inappropriate.</p>
40 CFR 60, Subpart KKKK – Stationary Combustion Turbines	<p>Subpart KKKK regulations apply to a stationary gas turbine for which construction, modification, or reconstruction is commenced after February 18, 2005 and that has a heat input at peak load equal to or greater than 10 MMBtu/hr based on the lower heating value of the fuel. The turbine currently installed at Compressor Station No. 3 has not been constructed, modified, or reconstructed after February 18, 2005; therefore, Subpart KKKK does not currently apply. However, the Department has determined that it is inappropriate to shield this source category from these rules.</p>

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

On March 5, 2009, EPA published in the Federal Register a proposed rule to amend 40 CFR 63, Subpart ZZZZ. The maintenance practices listed in Table 2d would apply to existing emergency stationary RICE less than 500 hp and includes changing oil and filter every 500 hours, replacing spark plugs every 1000 hours, and inspecting all hoses and belts every 500 hours and as necessary.

B. NESHAP Standards

As of the draft date of Operating Permit #OP2974-09, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

C. NSPS Standards

This facility is currently subject to 40 CFR 60, Subpart GG, Standards of Performance for Stationary Gas Turbines. As of the draft date of OP2974-09, the Department is unaware of future NSPS Standards that may be promulgated that will affect this facility.

D. Risk Management Plan

As of NBPL's renewal application date of May 1, 2009, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. NBPL has not notified the department of any change to applicability of this requirement. 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 (other than emission limits or standards proposed after November 15, 1990, since these regulations contain specific monitoring requirements);
- The emitting unit uses a control device to achieve compliance with such limit; and
- The emitting unit has potential pre-control device emissions of the applicable regulated air pollutant that are greater than major source thresholds.

NBPL does not currently have any emitting units that meet all the applicability criteria in ARM 17.8.1503, and is therefore not currently required to develop a CAM Plan.