



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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March 10, 2010

David Gates
NorthWestern Energy
40 East Broadway
Butte, MT 59701

Dear Mr. Gates:

Montana Air Quality Permit #2782-07 is deemed final as of March 10, 2010, by the Department of Environmental Quality (Department). This permit is for the Telstad Field Station, a natural gas processing plant. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

Kathleen Doran, P.E.
Environmental Engineer
Air Resources Management Bureau
(406) 247-4443

VW:KD

Enclosure

cc: Ross Whelchel, NorthWestern Energy, 40 E. Broadway, Butte MT 59701

Montana Department of Environmental Quality
Permitting and Compliance Division

Montana Air Quality Permit #2782-07

NorthWestern Energy
Telstad Field Station
40 East Broadway
Butte, MT 59701

March 10, 2010



MONTANA AIR QUALITY PERMIT

Issued To: NorthWestern Energy
Telstad Field Station
40 East Broadway Street
Butte, MT 59701

Montana Air Quality Permit #2782-07
Administrative Amendment (AA)
Request Received: 01/22/10
Department Decision on AA: 02/22/10
Permit Final: 03/10/10
AFS #101-0008

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to NorthWestern Energy (NWE) pursuant to Sections 75-2-204 and 211, Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

Section I: Permitted Facilities

A. Plant Location

NWE operates a natural gas processing plant and associated equipment located in the NE¹/₄ of the NE¹/₄ of Section 34, Township 32 North, Range 1 East, in Toole County, Montana. The facility is known as the Telstad Field Station. A complete list of the permitted equipment is contained in Section I.A of the permit analysis.

B. Current Permit Action

On January 22, 2010, the Department of Environmental Quality (Department) received an administrative amendment request from NWE for MAQP #2782-06. NWE requested the Department to correct the name of the facility from Telestad Field Station to Telstad Field Station. In addition, NWE also requested removal of the 800 brake horsepower (bhp) Clark compressor engine from the permitted equipment list because the compressor engine has been removed from service and will not be repaired.

The current permit action is an administrative amendment pursuant to ARM 17.8.764 and corrects the facility name to the Telstad Field Station. In addition, the 800 bhp Clark compressor engine has been removed from the permitted equipment list and the emissions inventory contained in the permit analysis has been updated.

Section II: Limitations and Conditions

A. Emission Limitations

1. Emissions from each of the two 600 bhp Ajax DPC-600 compressor engines (unit #4 and unit #5) shall not exceed the following (ARM 17.8.752):

Oxides of Nitrogen (NO _x) ¹	20.5 Pounds per hour (lb/hr)
Carbon Monoxide (CO)	1.46 lb/hr
Volatile Organic Compounds (VOC)	0.66 lb/hr

2. Emissions from the 160 bhp Ajax DPC-160 compressor engine (unit #6) shall not

¹ NO_x reported as NO₂.

exceed the following (ARM 17.8.752):

NO _x ¹	3.88 lb/hr
CO	3.88 lb/hr
VOC	0.28 lb/hr

3. Emissions from each of the two 1100 bhp Solar Saturn turbine compressor engines (unit #10 and unit #11) shall not exceed the following (ARM 17.8.749):

NO _x ¹	7.11 lb/hr
CO	11.57 lb/hr
VOC	1.66 lb/hr

4. The total combined hours of operation of the two 1100 bhp Solar Saturn turbine compressor engines shall be limited to 10,400 hours during any rolling 12-month period (ARM 17.8.749).
5. NWE shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
6. NWE shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
7. NWE shall not cause or authorize emissions to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
8. NWE shall treat all unpaved portions of the access roads, parking lots, and general plant area with water and/or chemical dust suppressant, as necessary, to maintain compliance with the reasonable precautions limitation in Section II.A.7 (ARM 17.8.749).

B. Testing Requirements

1. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The Department may require testing (ARM 17.8.105).

C. Operational Reporting Requirement:

1. NWE shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request.

¹ NO_x reported as NO₂

Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. NWE shall document, by month, the total hours of operation of the two 1100 bhp Solar Saturn turbine compressor engines. By the 25th day of each month, NWE shall total the combined hours of operation for the two 1100 bhp Solar Saturn turbine compressor engines for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.4. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
3. NWE shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745 that would include *the addition of a new emissions unit*, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(l)(d) (ARM 17.8.745).
4. All records compiled in accordance with this permit must be maintained by NWE as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the Department, and must be submitted to the Department upon request (ARM 17.8.749).

Section III: General Conditions

- A. Inspection – NWE shall allow the Department's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (continuous emission monitoring system (CEMS), compliance emission rate monitoring system (CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver - The permit and the terms, conditions, and matters stated herein shall be deemed accepted if NWE fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations - Nothing in this permit shall be construed as relieving the NWE of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement - Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department's decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay the Department's decision, unless the Board issues a stay upon receipt of a petition

and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of the Department's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, the Department's decision on the application is final 16 days after the Department's decision is made.

- F. Permit Inspection - As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by the Department at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by NWE may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit - Construction or installation must begin or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis
NorthWestern Energy
Telstad Field Station
MAQP #2782-07

I. Introduction/Process Description

A. Permitted Equipment

NorthWestern Energy (NWE) owns and operates a natural gas compressor station and associated equipment located in the NE¼ of the NE¼ of Section 34, Township 32 North, Range 1 East, Toole County, Montana. The facility is known as the Telstad Field Station and includes, but is not limited to, the following equipment:

- (2) 300 brake horsepower (bhp) Ingersoll Rand XVG compressor engines;
- (2) 600 bhp Ajax DPC-600 compressor engines;
- (1) 160 bhp Ajax DPC-160 compressor engine;
- (1) 400 thousand British thermal unit per hour (MBtu/hr) Olman Heath dehydrator reboiler;
- (2) 1100 bhp Solar Saturn turbine compressor engines;
- (1) 750 MBtu/hr Lochnivar heating boiler;
- (2) 190 bhp Waukesha natural gas emergency/backup generators; and
- Miscellaneous natural gas building heaters.

B. Source Description

The purpose of the facility is to boost the field gas to the natural gas transmission system. This initial compression of the gas is accomplished with the compressor engines and turbines described in Section I.A of the Permit Analysis. The heaters provide heat to the various station facilities.

Another purpose of the complex is to "dry" the gas as it is being processed. The gas contains some moisture that must be removed from the system prior to being sent into the transmission system. The gas is "dried" with a dehydrator, also commonly called a reboiler or glycol unit. The gas is treated with a glycol solution that absorbs the water in the gas stream. The glycol solution is then heated to about 300 degrees Fahrenheit (°F) to drive off the water and return the glycol. The heat necessary for this activity is generated by burning natural gas in the dehydrator reboiler.

C. Permit History

The 300 bhp Ingersoll Rand XVG compressor engines were installed at the Montana Power Company (MPC) Telstad compressor station in 1948, the Clark RA-8 compressor engine was installed in 1967, the 600 bhp Ajax DPC-600 compressor engines were installed in 1977, and the 160 bhp Ajax DPC-160 compressor engine was installed in July 1979.

On September 23, 1993, MPC was issued **MAQP #2782-00** for the operation of their natural gas processing plant and associated equipment. The 160 bhp Ajax DPC-160 compressor engine was installed in July 1979. Therefore, a Best Available Control Technology (BACT) analysis was required for the 160 bhp Ajax DPC-160 compressor

engine. Based on the BACT analysis, the Department of Environmental Quality (Department) determined BACT to be the proper operation of the 160 bhp Ajax DPC - 160 compressor engine to maintain compliance with the NO_x, CO, and VOC emission limitations. The heaters and the reboilers at the Telstad Field Station are considered minor sources. Based on previous determinations, BACT for these sources was determined to be no control.

On May 16, 1994, MAQP #2782-01 was issued for an alteration that was requested by MPC -Telstad. This alteration was requested because the Department revised the emission limitation units from gram per brake horsepower-hour (g/bhp-hr) to pound per hour (lb/hr). The revision was due to varying parameters such as engine revolutions per minute (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 engines to a g/bhp-hr limit, an hourly emission limit was allowed for operational flexibility.

In addition, MPC requested an alteration to their initial permit for the 160 bhp Ajax DPC-160. MPC requested to change the oxides of nitrogen (NO_x) emission limit from a 3.0 g/bhp-hr basis to 11.0 g/bhp-hr basis. In addition, MPC requested to change the carbon monoxide (CO) emission limit from 2.5 g/bhp-hr basis to 11.0 g/bhp-hr basis. A test conducted October 12, 1993, showed that MPC could not meet the initial NO_x and CO limitations. The Department agreed with MPC's request to increase the allowable emissions. The initial limitation was based on erroneous manufacturer data.

Also, as part of the permit alteration for MAQP #2782-01, the NO_x emission limitations were identified as NO₂, and the heaters were calculated at the next 1 million British thermal unit per hour (MMBtu/hr) increment. **MAQP #2782-01** replaced MAQP #2782-00.

On September 30, 1998, MPC requested a permit modification to MAQP #2782-01. The request involved removing the testing requirement for the 160 bhp Ajax DPC-160 compressor engine. Based on the emissions and past testing results from this source, the Department agreed that an every 4-year testing schedule was not necessary for the engine at that time; however, the limit remained and testing may be required in the future. This permit modification was consistent with other compressor stations and the Department's testing guidance. Rule references were also updated. **MAQP #2782-02** replaced MAQP #2782-01.

On October 4, 2001, MAQP #2782-03 was issued to MPC. MPC requested that MAQP #2782-02 be altered to facilitate the installation and operation of two 1100 bhp Solar Saturn turbine compressor engines and one 750 MBtu/hr heating boiler. In addition, MPC requested the removal of the 3000 MBtu/hr Sweetening Plant Reboiler, the 250 MBtu/hr Reclaimer Reboiler, the Sweetening Plant Flare, and the Sweetening Plant Dehydrator. The permit included a restriction on the hours of operation for the two Solar Saturn turbine compressor engines to a combined total of 10,400 hours per year. The limit allowed the facility to remain below the Prevention of Significant Deterioration (PSD) significance threshold value for NO_x. **MAQP #2782-03** replaced MAQP #2782-02.

On October 18, 2002, the Department received a request to administratively amend MAQP #2782-03 to incorporate a name change from MPC to NorthWestern Corporation (NorthWestern). MAQP #2782-04 incorporated the name change into the permit. **MAQP #2782-04** replaced Permit #2782-03.

On October 30, 2003, the Department received an administrative amendment request from NorthWestern for MAQP #2782-04. NorthWestern requested that the every 4-year testing requirements for each of the two 1100 bhp Solar Saturn turbine compressor engines be removed from the permit because NorthWestern's Title V Operating Permit OP#2782-03, issued as final on August 25, 2003, required semi-annual testing on each of the turbines.

MAQP #2782-05 removed the every 4-year testing requirements for each of the turbine compressor engines from the permit. In addition, the permit format, language, and rule references were updated to reflect the Department's current permit format, language, and rule references. **MAQP #2782-05** replaced MAQP #2782-04.

On February 7, 2008, the Department received an administrative amendment request from NWE for MAQP #2782-05. NWE requested a name change from NorthWestern to NWE. This action was an administrative amendment pursuant to Administrative Rules of Montana (ARM) 17.8.764 and changed the permittee name from NorthWestern to NWE. In addition, a typographic error in the facility name was corrected from Telstad Field Station to Telestad Field Station. **MAQP #2782-06** replaced MAQP #2782-05.

D. Current Permit Action

On January 22, 2010, the Department received an administrative amendment request from NWE for Permit #2782-06. NWE requested the Department to correct the name of the facility from Telestad Field Station to Telstad Field Station. In addition, NWE also requested removal of the 800 bhp Clark compressor engine from the permitted equipment list because the compressor engine has been removed from service and will not be repaired.

The current permit action is an administrative amendment pursuant to ARM 17.8.764 and corrects the facility name for the Telstad Field Station. In addition, the 800 bhp Clark compressor engine has been removed from the permitted equipment list and the emissions inventory contained in the permit analysis has been updated. **MAQP #2782-07** replaces MAQP #2786-06.

E. Additional Information

Additional information, such as applicable rules and regulations, BACT determinations, Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the ARM and are available upon request from the Department. Upon request, the Department will provide references for locations of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emissions of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary, using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

NWE shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation, or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀
11. ARM 17.8.230 Fluoride in Forage

NWE must maintain compliance with the applicable ambient air quality standards.

- C. ARM 17.8, Subchapter 3, Emission Standards, including, but not limited to:
1. ARM 17.8.304 Visible Air Contaminants. (1) This rule requires that no person may cause or authorize emissions to be discharged to the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over 6 consecutive minutes. (2) This rule requires that no person may cause or authorize emissions to be discharged to the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
 2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, NWE shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
 3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere, particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
 4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth by this rule.
 5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. NWE will consume pipeline quality natural gas in the compressor engines and reboilers, which meets this limitation.
 6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such a tank is equipped with a vapor loss control device as described in (1) of this rule, or is a pressure tank as described in (1) of this rule.
 7. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS). The NWE - Telstad compressor station, is not an NSPS affected source because it does not meet the definition of a natural gas processing plant as defined in 40 CFR 60, Subpart KKK.
 8. ARM 17.8.342 ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
 - a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a NESHAP Subpart as listed below:

b. 40 CFR 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. Owners or operators of oil and natural gas production facilities, as defined and applied in 40 CFR Part 63, shall comply with the applicable provisions of 40 CFR 63, Subpart HH. In order for a natural gas production facility to be subject to 40 CFR 63, Subpart HH requirements, certain criteria must be met. First the facility must be a major or area source of hazardous air pollutants (HAPs) as determined according to paragraphs (a)(1)(i) through (a)(1)(iii) of 40 CFR 63, Subpart HH. Second, a facility that is determined to be either a major or area source for HAPs must also either process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. Third, the facility must also contain an affected source as specified in paragraphs (b)(1) through (b)(4) of 40 CFR 63, Subpart HH. Finally, if the first three criteria are met, and the exemptions contained in paragraphs (e)(1) and (e)(2) of 40 CFR 63, Subpart HH do not apply, the facility is subject to the applicable provisions of 40 CFR 63, Subpart HH. Based on information submitted by NWE, the Telstad facility has triethylene glycol (TEG) dehydration units which are considered an affected area source of HAPs. Therefore the Telstad facility is subject to 40 CFR 63, Subpart HH, as applicable.

c. 40 CFR 63, Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. Owners or operators of natural gas transmission or storage facilities, as defined and applied in 40 CFR Part 63, shall comply with the standards and provisions of 40 CFR 63, Subpart HHH. In order for a natural gas transmission and storage facility to be subject to 40 CFR 63, Subpart HHH requirements, certain criteria must be met. First the facility must transport or store natural gas prior to the gas entering the pipeline to a local distribution company or to a final end user if there is no local distribution company. In addition, the facility must be a major source of HAPs as determined using the maximum natural gas throughput as calculated in either paragraphs (a)(1) and (a)(2) or paragraphs (a)(2) and (a)(3) of 40 CFR 63, Subpart HHH. Second, a facility must contain an affected source (glycol dehydration unit) as defined in paragraph (b) of 40 CFR 63, Subpart HHH. Finally, if the first two criteria are met, and the exemptions contained in paragraph (f) of 40 CFR 63, Subpart HHH, do not apply, the facility is subject to the applicable provisions of 40 CFR 63, Subpart HHH. Based on the information submitted by NWE, the Telstad facility is not subject to the provisions of 40 CFR 63 Subpart HHH because the facility is not a major source of HAPs.

D. ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. A permit fee is not

required for the current permit action because the permit action is considered an administrative permit change.

2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, as described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that pro-rate the required fee amount.

- E. ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits – When Required. This rule requires a person to obtain an air quality permit or permit modification to construct, modify, or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 tons per year of any pollutant. NWE has the PTE more than 25 tons per year of NO_x, CO, and VOC; therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits - General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits – Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units – Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, modification, or use of a source. NWE was not required to submit a permit application for the current permit action because the permit action is considered an administrative permit action. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. NWE was not required to notify the public of the current permit action because the permit action is considered an administrative permit change.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit

must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving NWE of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.760 Additional Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those applications that require an environmental impact statement.
12. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
13. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirements of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
14. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
15. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of intent to transfer,

including the names of the transferor and the transferee, is sent to the Department.

- F. ARM 17.8, Subchapter 8, Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
 2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications -- Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a listed source, but emissions are greater than 250 tons/year; therefore, the facility is considered a major stationary source. The current permit action will not result in emissions that are greater than the significance levels; therefore, a PSD review is not necessary. The current permit action is considered an administrative permit change.

- G. ARM 17.8, Subchapter 12, Operating Permit Program Applicability, including, but not limited to:
1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
 - a. PTE greater than 100 tons/year of any pollutant.
 - b. PTE greater than 10 tons/year of any one HAP, PTE greater than 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE greater than 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.
 2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #2782-07 for NWE, the following conclusions were made.
 - a. The facility's PTE is greater than 100 tons/year for NO_x.
 - b. The facility's PTE is less than 10 tons/year of any individual HAP and less than 25 tons/year of a combination of all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NSPS.
 - e. This facility is subject to the area source provisions of 40 CFR 63, Subpart HH.
 - f. This source is not a Title IV affected source, nor a solid waste combustion unit.
 - g. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that NWE is subject to the Title V Operating Permit Program. NWE's Title V Operating Permit #OP2782-06 was issued

final and effective on June 10, 2008.

III. BACT Determination

A BACT determination is required for each new or modified source. NWE shall install on the new or modified source the maximum air pollution control capability which is technically practicable and economically feasible, except that BACT shall be utilized. A BACT analysis was not required for the current permit action because the permit action is considered an administrative permit change.

IV. Emission Inventory

	Tons/Year					
	PM	PM ₁₀	SO _x	NO _x	VOC	CO
300 bhp Ingersoll Rand XVG compressor engine	0.11	0.11	0.01	31.87	12.75	4.06
300 bhp Ingersoll Rand XVG compressor engine	0.11	0.11	0.01	31.87	12.75	4.06
600 bhp Ajax DPC-600 compressor engine	0.22	0.22	0.01	89.79	2.89	6.39
600 bhp Ajax DPC-600 compressor engine	0.22	0.22	0.01	89.79	2.89	6.39
160 bhp Ajax DPC-160 compressor engine	0.06	0.06	0.00	16.99	1.23	16.99
400 MBtu/hr Olman Heath dehydrator reboiler	0.01	0.01	0.00	0.17	0.01	0.03
1100 bhp Solar Saturn turbine compressor engine	0.24	0.24	0.01	18.48	4.32	30.08
1100 bhp Solar Saturn turbine compressor engine	0.24	0.24	0.01	18.48	4.32	30.08
Natural gas building heaters	0.02	0.02	0.00	0.43	0.04	0.09
750 MBtu/hr Lochnivar heating boiler	0.02	0.02	0.00	0.32	0.02	0.06
(2) 190 bhp Waukesha natural gas-fired emergency/backup generator(s)	0.00	0.00	0.00	1.15	0.46	0.15
TOTAL	1.25	1.25	0.06	299.34	41.68	98.38

300 bhp Ingersoll Rand XVG Compressor Engines (2 Engines)

Brake Horsepower: 300 bhp
Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 10 lb/MMSCF (MAQP # 2782-02)

Control Efficiency: 0.0%

Fuel Consumption: 8500 Btu/bhp-hr (Maximum Design – MAQP #2782-02)

Calculations: $10 \text{ lb/MMSCF} * 8500 \text{ Btu/bhp-hr} * 1 \text{ SCF}/1020 \text{ Btu} * 300 \text{ bhp} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.11 \text{ ton/yr}$

NO_x Emissions

Emission factor: 11.00 g/bhp-hr(MAQP # 2782-02)

Calculations: $11.00 \text{ g/bhp} * 300 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 31.87 \text{ lb/hr}$

VOC Emissions

Emission factor: 4.40 g/bhp-hr (MAQP # 2782-02)

Calculations: $4.40 \text{ g/bhp} * 300 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 12.75 \text{ lb/hr}$

CO Emissions

Emission factor: 1.40 g/bhp-hr (MAQP # 2782-02)

Calculations: $1.40 \text{ g/bhp} * 300 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 4.06 \text{ lb/hr}$

SO₂ Emission

Emission factor: 0.002 g/bhp-hr(MAQP # 2782-02)

Calculations: $0.002 \text{ g/bhp} * 300 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.01 \text{ lb/hr}$

600 bhp Ajax DPC-600 Compressor Engines (2 Engines)

Brake Horsepower: 600 bhp
Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 10 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 8500 Btu/bhp-hr (Maximum Design – MAQP #2782-02)
Calculations: $10 \text{ lb/MMSCF} * 8500 \text{ Btu/bhp-hr} * 1 \text{ SCF/1020 Btu} * 600 \text{ bhp} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.22 \text{ ton/yr}$

NO_x Emissions

Emission factor: 20.5 lb/hr (Permit Limit)
Calculations: $20.5 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 89.79 \text{ lb/hr}$

VOC Emissions

Emission factor: 0.66 lb/hr (Permit Limit)
Calculations: $0.66 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 2.89 \text{ lb/hr}$

CO Emissions

Emission factor: 1.46 lb/hr (Permit Limit)
Calculations: $1.46 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 6.39 \text{ lb/hr}$

SO₂ Emission

Emission factor: 0.002 g/bhp-hr(MAQP # 2782-02)
Calculations: $0.002 \text{ g/bhp} * 600 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.01 \text{ lb/hr}$

160 bhp Ajax DPC-600 Compressor Engines (1 Engines)

Brake Horsepower: 160 bhp
Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 10 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 8500 Btu/bhp-hr (Maximum Design – MAQP #2782-02)
Calculations: $10 \text{ lb/MMSCF} * 8500 \text{ Btu/bhp-hr} * 1 \text{ SCF/1020 Btu} * 160 \text{ bhp} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.06 \text{ ton/yr}$

NO_x Emissions

Emission factor: 3.88 lb/hr (Permit Limit)
Calculations: $3.88 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 16.99 \text{ lb/hr}$

VOC Emissions

Emission factor: 0.28 lb/hr (Permit Limit)
Calculations: $0.28 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 1.23 \text{ lb/hr}$

CO Emissions

Emission factor: 3.88 lb/hr (Permit Limit)
Calculations: $3.88 \text{ lb/hr} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 16.99 \text{ lb/hr}$

SO₂ Emission

Emission factor: 0.002 g/bhp-hr(MAQP # 2782-02)
Calculations: $0.002 \text{ g/bhp} * 160 \text{ bhp} * 0.002205 \text{ lb/g} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.00 \text{ lb/hr}$

400 MBtu/hr Olman Heath dehydrator reboiler

Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 5 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 400 MBtu/hr (Information from Company – MAQP #2782-02)
Calculations: $5 \text{ lb/MMSCF} * 400 \text{ MBtu/hr} * 1 \text{ SCF/1020 Btu} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.01 \text{ ton/yr}$

NO_x Emissions

Emission Factor: 100 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 400 MBtu/hr (Information from Company – MAQP #2782-02)
Calculations: $100 \text{ lb/MMSCF} * 400 \text{ MBtu/hr} * 1 \text{ SCF/1020 Btu} * 8760 \text{ hr/yr} * 0.0005 \text{ ton/lb} = 0.17 \text{ ton/yr}$

VOC Emissions

Emission Factor: 8 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 400 MBtu/hr (Information from Company – MAQP #2782-02)
Calculations: 8 lb/MMSCF * 400 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.01 ton/yr

CO Emissions

Emission Factor: 20 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 400 MBtu/hr (Information from Company – MAQP #2782-02)
Calculations: 20 lb/MMSCF * 400 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.03 ton/yr

SO₂ Emission

Emission Factor: 0.6 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 400 MBtu/hr (Information from Company – MAQP #2782-02)
Calculations: 0.6 lb/MMSCF * 400 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.00 ton/yr

1100 bhp Solar Saturn Turbine Compressor Engines (2 Engines)

Brake Horsepower: 1100 bhp
Hours of Operation: 10,400 hr/yr (**RESTRICTION:** combined total of 10,400 operating hours per year)

PM / PM10 Emissions

Emission Factor: 10 lb/MMSCF (use same factor as MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 8500 Btu/bhp-hr (Maximum Design – MAQP #2782-02)
Calculations: 10 lb/MMSCF * 8500 Btu/bhp-hr * 1 SCF/1020 Btu * 1100 bhp * 10,400 hr/yr * 0.0005 ton/lb = 0.48 ton/yr

NO_x Emissions

Emission factor: 7.11 lb/hr (Permit Limit)
Calculations: 7.11 lb/hr * 10,400 hr/yr * 0.0005 ton/lb = 36.97 lb/hr

VOC Emissions

Emission factor: 1.66 lb/hr (Permit Limit)
Calculations: 1.66 lb/hr * 10,400 hr/yr * 0.0005 ton/lb = 60.16 lb/hr

CO Emissions

Emission factor: 11.57 lb/hr (Permit Limit)
Calculations: 11.57 lb/hr * 10,400 hr/yr * 0.0005 ton/lb = 8.63 lb/hr

SO₂ Emission

Emission factor: 0.002 g/bhp-hr(MAQP # 2782-02)
Calculations: 0.002 g/bhp * 1100 bhp * 0.002205 lb/g * 10,400 hr/yr * 0.0005 ton/lb = 0.02 lb/hr

Natural Gas Building Heaters (up to 1 MMBtu/hr)

Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 5 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 1 MMBtu/hr
Calculations: 5 lb/MMSCF * 1 MMBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.02 ton/yr

NO_x Emissions

Emission Factor: 100 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 1 MMBtu/hr
Calculations: 100 lb/MMSCF * 1 MMBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.43 ton/yr

VOC Emissions

Emission Factor: 8 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 1 MMBtu/hr
Calculations: 8 lb/MMSCF * 1 MMBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.03 ton/yr

CO Emissions

Emission Factor: 20 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 1 MMBtu/hr
Calculations: 20 lb/MMSCF * 1 MMBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.09 ton/yr

SO₂ Emission

Emission Factor: 0.6 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 1 MMBtu/hr
Calculations: 0.6 lb/MMSCF * 1 MMBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.00 ton/yr

750 MBtu/hr Lochnivar Heating Boiler

Hours of Operation: 8760 hr/yr

PM / PM10 Emissions

Emission Factor: 5 lb/MMSCF (use same emission factors as MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 750 MBtu/hr
Calculations: 5 lb/MMSCF * 750 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.02 ton/yr

NO_x Emissions

Emission Factor: 100 lb/MMSCF (use same emission factors as MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 750 MBtu/hr
Calculations: 100 lb/MMSCF * 750 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.32 ton/yr

VOC Emissions

Emission Factor: 8 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 750 MBtu/hr
Calculations: 8 lb/MMSCF * 750 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.02 ton/yr

CO Emissions

Emission Factor: 20 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 750 MBtu/hr
Calculations: 20 lb/MMSCF * 750 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.06 ton/yr

SO₂ Emission

Emission Factor: 0.6 lb/MMSCF (use same emission factors as MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 750 MBtu/hr
Calculations: 0.6 lb/MMSCF * 750 MBtu/hr * 1 SCF/1020 Btu * 8760 hr/yr * 0.0005 ton/lb = 0.00 ton/yr

190 bhp Waukesha natural gas-fired emergency/backup generator/engine(s)

Brake Horsepower: 190 bhp
Hours of Operation: 500 hr/yr

PM / PM10 Emissions

Emission Factor: 10 lb/MMSCF (MAQP # 2782-02)
Control Efficiency: 0.0%
Fuel Consumption: 8500 Btu/bhp-hr (Maximum Design – MAQP #2782-02)
Calculations: 10 lb/MMSCF * 8500 Btu/bhp-hr * 1 SCF/1020 Btu * 190 bhp * 500 hr/yr * 0.0005 ton/lb = 0.00 ton/yr

NO_x Emissions

Emission factor: 11.00 g/bhp-hr(MAQP # 2782-02)
Calculations: 11.00 g/bhp * 190 bhp * 0.002205 lb/g * 500 hr/yr * 0.0005 ton/lb = 1.15 lb/yr

VOC Emissions

Emission factor: 4.40 g/bhp-hr (MAQP # 2782-02)
Calculations: 4.40 g/bhp * 190 bhp * 0.002205 lb/g * 500 hr/yr * 0.0005 ton/lb = 0.46 lb/yr

CO Emissions

Emission factor: 1.40 g/bhp-hr (MAQP # 2782-02)

Calculations: 1.40 g/bhp * 190 bhp * 0.002205 lb/g * 500 hr/yr * 0.0005 ton/lb = 0.15 lb/hr

SO₂ Emission

Emission factor: 0.002 g/bhp-hr(MAQP # 2782-02)

Calculations: 0.002 g/bhp * 190 bhp * 0.002205 lb/g * 500 hr/yr * 0.0005 ton/lb = 0.00 lb/hr

V. Existing Air Quality and Monitoring Requirements

The existing air quality of the area is expected to be in compliance with all state and federal requirements. NWE (as MPC) previously conducted ambient air quality modeling for all compressor stations in and near Glacier, Toole, Liberty, and Pondera Counties using two EPA guideline models, ISC2 and COMPLEX. The meteorological data that was used was taken from the Great Falls Airport National Weather Service station. The modeling that was submitted conservatively assumed that approximately 455.0 tons per year of NO_x and 455.0 tons per year of CO would be emitted. This modeling did not show violations of the annual or hourly ambient standards. The modeling analysis demonstrated that this facility would not cause a violation or exceedance of any state or federal ambient standard. In addition, because the current NO_x and CO emissions are below the NO_x and CO emissions assumed for the modeling, the Department expects the facility to continue to operate in compliance with all applicable ambient air quality standards.

VI. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

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?
		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.

VII. Environmental Assessment

The current permit action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an Environmental Assessment is not required.

MAQP Analysis Prepared By: K.Doran
Date: February 10, 2010