

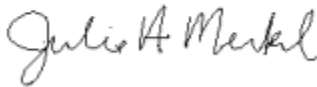
November 22, 2017

Richard Ayala  
Highland Crude, LLC  
Albin Station  
370 Van Gordon Street  
Lakewood, CO 80228

Dear Mr. Ayala:

Montana Air Quality Permit #4599-06 is deemed final as of November 22, 2017, by the Department of Environmental Quality (Department). This permit is for a crude oil storage and distribution facility. 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,



Julie A. Merkel  
Permitting Services Section Supervisor  
Air Quality Bureau  
(406) 444-3626



John P. Proulx  
Air Quality Specialist  
Air Quality Bureau  
(406) 444-5391

JM:JPP  
Enclosure

Montana Department of Environmental Quality  
Air, Energy & Mining Division

Montana Air Quality Permit #4599-06

Highland Crude, LLC  
Albin Station  
370 Van Gordon Street  
Lakewood, CO 80228

November 22, 2017



## MONTANA AIR QUALITY PERMIT

Issued To: Hiland Crude, LLC  
Albin Station  
370 Van Gordon Street  
Lakewood, CO 80228

MAQP: #4599-06  
Application Complete: 10/5/2017  
Preliminary Decision Issued: 10/19/2017  
Department Decision Issued: 11/6/2017  
Permit Final: 11/22/2017  
AFS #: 083-0796

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to Hiland Crude, LLC (Hiland) pursuant to Sections 75-2-204 and 211 of the 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

Hiland Crude, LLC (Hiland) owns and operates a crude oil unloading facility located in the Southwest  $\frac{1}{4}$  of the Southwest  $\frac{1}{4}$  of Section 25, Township 24 North, Range 56 East in Richland County, Montana. The site, identified as the Albin Station, is sited approximately five miles southwest of Girard, Montana.

#### B. Current Permit Action

On September 26, 2017, the Department received an application from Bison Engineering Inc. on behalf of Highland Crude, LLC to modify MAQP #4599. The modification requests a decrease to the combined throughput of crude oil associated with Tanks A1-A6 and AE1-AE13 as well as an update to the emissions associated with the 100,000 barrel (bbl) and 25,000 bbl crude oil storage tanks based on a site-specific analysis of the crude oil's Reid vapor pressure (RVP). The modification also includes correcting the heat ratings of the two propane heaters and updating their potential emissions accordingly.

### SECTION II: Conditions and Limitations

#### A. Operational Limitations

1. Hiland shall only unload crude oil at the facility (ARM 17.8.749).
2. The combined throughput of crude oil through Tanks A1 through A6 and Tanks AE1 through AE13, shall not exceed 29,127,000 gallons during any Rolling 12-month period (ARM 17.8.1204).
3. The combined throughput of crude oil through Tank 100-1, Tank 25-1, and Tank 25-2 shall not exceed 667,764,720 gallons during any rolling 12-month period (ARM 17.8.1204).
4. Hiland shall be limited to tanker truck unloading operations only. No loading of tanker trucks shall take place at the facility (ARM 17.8.749).

5. Loading of crude oil into the tanks shall be restricted to submerged fill loading. Submerged fill loading may be accomplished via a submerged fill pipe method and/or a bottom fill loading method (ARM 17.8.752).
6. Hiland shall not operate or have on site more than one (1) propane-fired generator set and the maximum rated design capacity of the engine driving the generator shall not exceed 11 brake-horsepower (8 kilowatts) (ARM 17.8.749).
7. Hiland 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).
8. Hiland 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 (ARM 17.8.308).
9. Hiland shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.8 (ARM 17.8.752).
10. Hiland shall comply with all applicable standards, testing, reporting, recordkeeping, and monitoring requirements of 40 CFR 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*, for any applicable liquid storage vessel (ARM 17.8.752, ARM 17.8.340, and 40 CFR 60, Subpart Kb).
11. Hiland shall comply with all applicable standards, testing, reporting, recordkeeping, and monitoring requirements of 40 CFR 60, Subpart OOOO, *Standards of Performance for crude Oil and Natural Gas Production, Transmission and Distribution*, for any applicable liquid storage vessel (ARM 17.8.752, ARM 17.8.340, and 40 CFR 60, Subpart OOOO).
12. Hiland shall comply will all applicable standards and limitations, and the reporting, recordkeeping, and notification requirements contained in 40 CFR 60, Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* and 40 CFR 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*, for any applicable spark ignition internal combustion engine (ARM 17.8.340; 40 CFR 60, Subpart JJJJ; ARM 17.8.342 and 40 CFR 63, Subpart ZZZZ).

B. Inspection and Maintenance Requirements

1. Each calendar month, tanks, valves, flanges, pump seals, open-ended lines, connectors, hatches, man way covers, and air eliminators shall be inspected for excessive leaks. For purposes of this requirement, detection methods incorporating sight, sound, or smell are acceptable (ARM 17.8.105 and ARM 17.8.752).

2. Hiland shall (ARM 17.8.105 and ARM 17.8.752):
  - a. Make a first attempt at repair for any leak no later than 5 calendar days after the leak is detected; and
  - b. Repair any leak as soon as practicable, but no later than 15 calendar days after it is detected, except as provided in Section II.B.3.
3. Delay of repair of equipment for which a leak has been detected would be allowed if repair within 15 days is technically infeasible. Such equipment shall be repaired as soon as reasonably possible (ARM 17.8.752).

C. Recordkeeping Requirements

1. Hiland shall document the monthly inspections, indicating the date of the inspection and the results (ARM 17.8.749).
2. For any repair delayed under the exception of Section II.B.3 above, the duration of the leak, a general description of the repair required, and the reasons justifying the delay, shall be recorded and maintained with the records required in Section II.C.1 (ARM 17.8.749).
3. All records compiled in accordance with this permit must be maintained by Hiland 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 of Environmental Quality (Department) and must be submitted to the Department upon request (ARM 17.8.749).

D. Testing Requirements

1. The Department may require testing (ARM 17.8.105).
2. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

E. Reporting Requirements

1. Hiland 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. 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. A copy of any records kept as required by Section II.C.2 shall be submitted to the Department postmarked within 30 days of the inspection in which the leak was detected. A follow up report, if needed, shall follow describing corrective actions taken (ARM 17.8.749).
3. Hiland 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 startup 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. Highland shall document, by month, the combined throughput of crude oil through Tanks A1 through A6 and Tanks AE1 through AE13. By the 25<sup>th</sup> day of each month, Highland shall total the combined throughput of crude oil for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.2. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
5. Highland shall document, by month, the combined throughput of crude oil through Tank 100-1, Tank 25-1, and Tank 25-2. By the 25<sup>th</sup> day of each month, Highland shall total the combined throughput of crude oil for the previous month. The monthly information will be used to verify compliance with the rolling 12-month limitation in Section II.A.3. The information for each of the previous months shall be submitted along with the annual emission inventory (ARM 17.8.749).
6. Highland shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit as required by ARM 17.8.1204(3)(b). The annual certification shall comply with the certification requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emission inventory information (ARM 17.8.749 and ARM 17.8.1204).

### SECTION III: General Conditions

- A. Inspection – Hiland 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 Emissions Monitoring System (CEMS), Continuous Emissions 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 Hiland fails to appeal as indicated below.

- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Hiland 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 MAQP shall be made available for inspection by the Department at the location of the source.
- G. Air Quality Operation Fees – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Hiland 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  
Hiland Crude, LLC  
MAQP #4599-06

I. Introduction/Process Description

Hiland Crude, LLC (Hiland) owns and operates a crude oil unloading station. The facility is located in the Southwest ¼ of the Southwest ¼ of Section 25, Township 24 North, Range 56 East, in Richland County, Montana, and is referred to as the Albin Station.

A. Permitted Equipment

1. Crude Oil Tanks:

- One (1) 4,200,000 gallon (gal) internal floating roof tank [100,000 barrels (bb)]
- Two (2) 1,050,000 gal internal floating roof tanks [25,000 bbl]
- Nineteen (19) 16,800 gal vertical fixed roof tanks [400 bbl]

2. Two (2) 500,000 British Thermal Units per hour (Btu/hr) natural gas fired heaters.

3. One (1) 8 kilowatt (kW) propane-fired emergency generator.

4. Associated Equipment; including truck unloading racks, pumps, valves, and miscellaneous connections.

5. Three (3) 16,800 gal vertical fixed roof fresh water storage tanks [400 bbl].

B. Source Description

Hiland owns and operates a crude oil unloading facility. Crude oil enters the facility via tanker truck and pipeline and is stored in various sized tanks. Crude oil is transferred off-site by way of pipeline using an electric pump. The natural gas fired heaters are employed to heat the crude oil, reducing its viscosity to facilitate the oil transfer process. Evaporative losses during storage and during filling and emptying operations occur from the tanks. Fugitive emissions occur from vapor losses from valves, pump seals, flanges, connectors, hatches, man-way covers, and air eliminators.

C. Permit History

On September 21, 2010, the Montana Department of Environmental Quality (Department) received a complete MAQP Application from Banner Transportation Co., LLC for the operation of a crude oil unloading facility to be known as the Albin Station. **MAQP #4599-00** was issued final on November 25, 2010.



On January 10, 2012, the Department received an application for modification of the existing air quality permit proposing the installation of three (3) additional 400 barrel fixed roof crude oil storage tanks to the Albin Station. A subsequent correspondence was received on February 8, 2012 requesting the inclusion of two additional 400 barrel fixed roof crude oil storage tanks in the permit action.

The permitting action incorporated the proposed modifications, updated the rule references and language used by the Department, and updated the emissions inventory. **MAQP #4599-01** replaced MAQP #4599-00.

The Department received a letter from Hiland on June 13, 2012, that requested an administrative amendment of MAQP #4599-01 to change the name from Banner Transportation Co, LLC to Hiland. **MAQP #4599-02** replaced MAQP #4599-01.

On October 5, 2012, the Department received an application for modification of MAQP #4599-02 from Bison Engineering, Inc. (Bison), on behalf of Hiland, proposing the installation of four (4) additional 400 barrel fixed roof crude oil storage tanks to the Albin Station. The current permit action incorporates the proposed modifications, as well as, the installation of an 8 kilowatt (kW) propane-fired emergency generator, addressed in a de minimis notification received by the Department on April 30, 2012. The application received for the current action did not account for two 400 bbl fixed roof crude oil tanks which were installed under MAQP #4599-01. Upon consultation with Hiland, it was determined that four additional tanks were still necessary. In addition to the aforementioned changes, adjustments were made at the request of the permit holder to several tank identification references. This permit action also updates the rule references and language used by the Department, and updates the emissions inventory. **MAQP #4599-03** replaced MAQP# 4599-02.

The Department received an application for the modification of MAQP #4599-03 from Hiland, proposing the increase of throughput for Tank 100-1, Tank 25-1 and Tank 25-2 to not exceed 667,764,720 gallons during any rolling 12-month period. **MAQP #4599-04** replaced MAQP 4599-03.

On July 25 2016, the Department received a request from Hiland Partners Holdings, LLC, to change the mailing address from 2 North Nevada Avenue, Colorado Springs, CO 80903 to 370 Van Gordon Street, Lakewood, CO 80228 and to update the facility contact for facilities operating under the name Hiland Crude, LLC. The permit action updated the mailing address as well as updated the permit to current permit language and references. **MAQP #4599-05** replaced MAQP #4599-04.

#### D. Current Permit Action

On September 26, 2017, the Department received an application from Bison Engineering Inc. on behalf of Highland, to modify MAQP #4599. Highland requests to decrease the combined throughput of crude oil associated with Tanks A1-A6 and AE1-AE13. Recent lab testing has resulted in a more accurate Reid Vapor Pressure (RVP) value of ~10.34 instead of an RVP value of 5 that was used in previous calculations for maximum potential emissions. The modification also requests an update to emissions for the existing tanks using the current RVP of ~10.34. The

modification request also includes correcting the heat ratings of the two propane heaters to 500,000 BTU/hr and updating their potential emissions accordingly. **MAQP #4599-06** replaces MAQP #4599-05.

E. Response to Public Comment

Person/Group Commenting	Permit Reference	Comment	Department Response
Highland Crude, LLC	MAQP Analysis, Section IV – Emissions Inventory	<p>a. “The VOC emissions from tanks 25-1 and 25-2 are listed as 1.24 tpy, however, the emission from each of those tanks is actually 2.47 tons per year.”</p> <p>b. “the emissions are off by a factor of 10 in the draft permit calculations. They should actually be 0.0163 tpy”.</p> <p>c. “The permit application we submitted represented the fuel heat value as 1050 Btu/scf”.</p>	<p>a. The Department changed the emissions to 2.47 tpy for tanks 25-1 and 25-2 and corrected the total emissions.</p> <p>b. The Department corrected the error to reflect the correct emissions.</p> <p>c. The Department used 1020 btu/scf as a standard for calculating emissions related to natural gas. The Department recalculated the emissions using 1050 btu/scf and made the necessary corrections to the emissions total for the natural gas-fired heater.</p>

F. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology/ (BACT)/Reasonably Available Control Technology 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 Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for location 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 emission 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).

Hiland 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 of 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 as to create a public nuisance.
- B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide (SO<sub>2</sub>)
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide (NO<sub>2</sub>)
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide (CO)
5. ARM 17.8.213 Ambient Air Quality Standards for Ozone (O<sub>3</sub>)
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide (H<sub>2</sub>S)
7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter (PM)
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standards for Lead
10. ARM 17.8.223 Ambient Air Quality Standards for Particulate Matter with an Aerodynamic Diameter of Ten Microns or Less (PM<sub>10</sub>)

Hiland 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. This rule requires that no person may cause or authorize emissions to be discharged into 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 are taken to control emissions of airborne particulate matter. (2) Under this rule, Hiland 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, authorize, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
  5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.
  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 tank is equipped with a vapor loss control device 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 Code of Federal Regulation (CFR) Part 60, Standards of Performance for New Stationary Sources (NSPS). Based on the information submitted by Hiland, the following NSPS (40 CFR 60) are applicable:
    - a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
    - b. 40 CFR 60 Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984. The affected facility to which this subpart applies is each storage vessel with a capacity greater than or equal to 75 cubic meters (m<sup>3</sup>) that is used to store volatile organic liquids (VOL) for which construction, reconstruction, or modification is commenced after July 23, 1984, except storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> storing a liquid

with a maximum true vapor pressure less than 3.5 kilopascals (kPa) or with a capacity greater than or equal to 75 m<sup>3</sup> but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa.

This subpart does not apply to the 400 bbl tanks (63.6 m<sup>3</sup>). However, the 25,000 bbl tanks [Tanks 25-1 and 25-2) and the 100,000 (Tank 100-1) bbl tank are subject to this subpart. Therefore, these tanks must comply with the requirements of 40 CFR 60.112b. Based on the information submitted by Bison Engineering, Inc. on behalf of Hiland, the design and operation of these tanks complies with the requirements of this subpart.

- c. 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The provisions of this subpart are applicable to owners and operators of stationary spark ignition internal combustion engines (SI ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 horsepower. As the condition related to generator set engine is written de minimis friendly, applicability to 40 CFR 60, Subpart JJJJ is dependent upon the SI ICE equipment installed and operated.
- d. 40 CFR 60, Subpart OOOO - Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution. Pursuant to 40 CFR §60.5365, affected sources are those onshore crude oil and natural gas production, transmission and distribution facilities listed which commence construction, modification or reconstruction after August 23, 2011. Facility operations at the Albin Station subject to this subpart are limited to each single crude oil storage vessel. 40 CFR 60, Subpart OOOO does not prescribe emissions standards or control requirements for storage vessel with VOC (volatile organic compounds) emissions less than 6 tons per year (tpy), nor storage vessel subject to and controlled in accordance with the requirements for storage vessels in 40 CFR 60, Subpart Kb.

At this time no applicable emission standards or control requirements exist for the storage vessels operating at the Albin Station, as the 400 bbl fixed roof tanks (Tanks A01-A6 and AE1-AE13) do not present VOC emissions equal to or greater than 6 tpy and the remaining storage vessels (Tanks 100-1, 25-1, and 25-2) are subject to and controlled in accordance with the requirements for storage vessels in 40 CFR 60, Subpart Kb.

- 8. ARM 17.8.341 Emission Standards for Hazardous Air Pollutants. This source shall comply with the standards and provisions of 40 CFR Part 61, as appropriate.
- 9. 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 any applicable requirements of 40 CFR Part 63. Based on the information submitted by Hiland, the following NESHAP (40 CFR 63) are applicable:

- a. 40 CFR 63, Subpart A – General Provisions apply to all equipment of facilities subject to a NESHAP Subpart as listed below:
- b. 40 CFR 63, Subpart ZZZZ – NESHAPs for Stationary Reciprocating Internal Combustion Engines (RICE). Pursuant to 40 CFR §63.6590(a), an affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of hazardous air pollutant (HAP) emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. Pursuant to 40 CFR 63.6590(a)(2)(iii), a stationary RICE located at an area source of HAP emissions is new if you commenced construction of the stationary RICE on or after June 12, 2006. As Hiland is considered an area source of HAP emissions and operates RICE equipment the propane-fired generator engine is subject to this subpart.

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 MAQP application fee concurrent with the submittal of an MAQP application. A permit application is incomplete until the proper application fee is paid to the Department. The current permit action is considered an administrative amendment; therefore, Hiland was not required to submit an application fee.
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 MAQP (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 MAQP application fee. The annual assessment and collection of the air quality operation fee, 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 prorate 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 MAQP or permit modification to construct, modify, or use any air contaminant sources that have the potential to emit (PTE) greater than 25 tpy of any pollutant. Hiland has a PTE greater than 25 tpy of PM and VOC; therefore, an MAQP 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. The current permit action is considered an administrative amendment; a permit application was not required. (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. The current permit action is an administrative amendment, and therefore, did not require a publication of a public notice.
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 MAQPs 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 Hiland 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 17.8.762 Duration of Permit. An MAQP 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.

12. ARM 17.8.763 Revocation of Permit. An MAQP may be revoked upon written request of the permittee, or for violations of any requirement 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).
13. ARM 17.8.764 Administrative Amendment to Permit. An MAQP 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.
14. ARM 17.8.765 Transfer of Permit. This rule states that an MAQP 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 major stationary source because this facility is not a listed source and the facility's PTE is below 250 tpy of any pollutant (excluding fugitive emissions).

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 > 100 tpy of any pollutant.



- b. PTE > 10 tpy of any single Hazardous Air Pollutant (HAP), or PTE > 25 tpy of any combination of HAP's, or lesser quantity as the Department may establish by rule.
  - c. PTE > 70 tpy of PM<sub>10</sub> in a serious PM<sub>10</sub> non-attainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. (1) Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing MAQP #4599-06 for Hiland, the following conclusions were made:
- a. The facility's PTE is less than 100 tpy for any pollutant.
  - b. The facility's PTE is less than 10 tpy for any single HAP and less than 25 tpy of combined HAPs.
  - c. This source is not located in a serious PM<sub>10</sub> non-attainment area.
  - d. This facility is subject to a current NSPS (40 CFR 60, Subpart A, Subpart Kb, Subpart OOOO, and potentially Subpart JJJJ).
  - e. This facility is subject to a current NESHAP (40 CFR 63, Subpart A and Subpart ZZZZ).
  - f. This source is not a Title IV affected source.
  - g. This source is not an EPA designated Title V source.
  - h. As allowed by ARM 17.8.1204(3), the Department may exempt a source from the requirement to obtain an air quality operating permit by establishing federally enforceable limitations which limit that source's potential to emit.
    - i. In applying for an exemption under this section, the owner or operator of the source shall certify to the Department that the source's potential to emit, does not require the source to obtain an air quality operating permit.
    - ii. Any source that obtains a federally enforceable limit on potential to emit shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit.

Highland has taken federally enforceable permit limits to keep potential emissions below major source permitting thresholds. Therefore, the facility is not a major source and, thus a Title V operating permit is not required.

The Department determined that the annual reporting requirements contained in the permit are sufficient to satisfy this requirement.

3. ARM 17.8.1207 Certification of Truth, Accuracy, and Completeness.

Highland shall annually certify that its actual emissions are less than those that would require the source to obtain an air quality operating permit as required by ARM 17.8.1204 (3)(b). The annual certification shall comply with requirements of ARM 17.8.1207. The annual certification shall be submitted along with the annual emission inventory information.

Based on these facts, the Department has determined that Hiland will be a minor source of emissions as defined under Title V based on the requested federally enforceable permit limits. However, if minor sources subject to NSPS or NESHAP are required to obtain a Title V Operating Permit, Hiland will be required to obtain a Title V Operating Permit.

III. BACT Determination

A BACT determination is required for each new or modified source. Hiland shall install on the new or modified source the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized.

Since the current permitting action does not modify or add any new emitting units nor does it change any method of operation for crude oil storage and distribution, a new BACT determination was not needed.

IV. Emissions Inventory

Emission Source		Emissions (Ton/Year)							
		Emissions Tons/Year [PTE]							
Tank	Tank Description	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	CO	NO <sub>x</sub>	SO <sub>2</sub>	VOC	HAPS
100-1	100,000 bbl Internal Floating Roof	--	--	--	--	--	--	1.77	0.07
25-1	25,000 bbl Internal Floating Roof	--	--	--	--	--	--	2.47	0.05
25-2	25,000 bbl Internal Floating Roof	--	--	--	--	--	--	2.47	0.05
A1 - A6	400 bbl Vertical Fixed Roof	--	--	--	--	--	--	18.49	0.70
AE1 - AE13	400 bbl Vertical Fixed Roof	--	--	--	--	--	--	40.06	1.51
	Equipment Leaks	--	--	--	--	--	--	17.50	2.21
	.5 mmbTU Natural Gas Heater (2)	0.163	0.0122	0.004	0.18	0.214	0.0028	0.0118	--
	8 kW Propane Emergency Generator	0.00683	0.00678	0.00005	0.381	2.79	0.0004	0.08075	--
	Fugitive Particle Emissions - Vehicles	53.8	16.86	1.57	--	--	--	--	--
	<b>Total</b>	<b>53.97</b>	<b>16.88</b>	<b>1.57</b>	<b>0.56</b>	<b>3.00</b>	<b>0.0032</b>	<b>82.86</b>	<b>4.57</b>

Working Emissions						
Tank Identification	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Working Loss	Breathing Loss	Total Emissions
100,000 bbl	0.985	0.213	0.577	--	--	1.774
25,000 bbl	0.985	0.912	0.577	--	--	2.473
400 bbl	--	--	--	2.068	1.013	3.081
					<b>Combined Total</b>	<b>7.33</b>

Componet Emissions

Component	Number of Compoents	Emission Factor		VOC Emissions	
		kg/hr	lbs/hr	lbs/hr	TPY
Valves	485	0.0025	0.0055	2.6736	11.7102
Pump Seals	18	0.013	0.0287	0.5160	2.2599
Other	44	0.0075	0.0165	0.7277	3.1871
Connectors	0	0.00021	0.0005	0.0000	0.0000
Flanges	318	0.00011	0.0002	0.0771	0.3378
Open-end Lines	0	0.0014	0.0031	0.0000	0.0000
Total VOC				3.99	17.50

Individual Tank Hazardous Air Pollutant Emissions: Based on US EPA Speciate Program Profile No. 1208 - Crude Oil Production Gathering Tanks

HAP Constituent	Emission Factor [% HAP-Vapor Phase]	Emission Factor				
		100,000 bbl	25000 bbl	400 bbl	Equipment Leaks	Working Loss
2,2,4,-Trimethylpentane	0.56	0.0199	0.0138	0.3279	0.0980	0.0980
Benzene	0.12	0.0043	0.0030	0.0703	0.0210	0.0210
Ethylbenzene	0.09	0.0032	0.0022	0.0527	0.0157	0.0157
m & p-Xylene	0.46	0.0163	0.0114	0.2693	0.0805	0.0805
n-Hexane	2.2	0.0780	0.0544	1.2881	0.3849	0.3849
o-Xylene	0.11	0.0039	0.0027	0.0644	0.0192	0.0192
Toluene	0.23	0.0082	0.0057	0.1347	0.0402	0.0402
Total (ton/Year)		0.1337	0.0932	0.0932	2.2073	0.6596

**TANKS 4.0.9D Annual Emission Reports:**

**TANKS 4.0.9d  
Emissions Report - Detail Format  
Tank Identification and Physical Characteristics**

**Identification**

User Identification: 100,000 Gallon  
 City: Sidney  
 State: Montana  
 Company: Highland Crude  
 Type of Tank: Internal Floating Roof Tank  
 Description: 100K

**Tank Dimensions**

Diameter (ft): 134.00  
 Volume (gallons): 4,200,000.00  
 Turnovers: 16.62  
 Self Supp. Roof? (y/n): Y  
 No. of Columns: 0.00  
 Eff. Col. Diam. (ft): 0.00

**Paint Characteristics**

Internal Shell Condition: Light Rust  
 Shell Color/Shade: White/White  
 Shell Condition: Good  
 Roof Color/Shade: White/White  
 Roof Condition: Good

**Rim-Seal System**

Primary Seal: Mechanical Shoe  
 Secondary Seal: None

**Deck Characteristics**

Deck Fitting Category: Typical  
 Deck Type: Welded

**Deck Fitting/Status**

	<b>Quantity</b>
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	49
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1

Meteorological Data used in Emissions Calculations: Williston, North Dakota (Avg Atmospheric Pressure = 13.82 psia)

**TANKS 4.0.9d  
Emissions Report - Detail Format  
Liquid Contents of Storage Tank**

**4599-06 – 100,000 bbl Internal Floating Roof Tank  
Sidney, Montana**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
RVP 10.34	All	43.08	37.17	48.98	41.45	5.8596	N/A	N/A	46.2120			135.96	

## TANKS 4.0.9d Emissions Report - Detail Format Detail Calculations (AP-42)

### 4599-06 – 100,000 bbl Internal Floating Roof Tank Sidney, Montana

#### Annual Emission Calculations

Rim Seal Losses (lb):	1,969.0755
Seal Factor A (lb-mole/ft-yr):	5.8000
Seal Factor B (lb-mole/ft-yr (mph) <sup>n</sup> ):	0.3000
Value of Vapor Pressure Function:	0.1371
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	5.8596
Tank Diameter (ft):	134.0000
Vapor Molecular Weight (lb/lb-mole):	46.2120
Product Factor:	0.4000
Withdrawal Losses (lb):	425.7583
Number of Columns:	0.0000
Effective Column Diameter (ft):	0.0000
Annual Net Throughput (gal/yr.):	69,804,000.0000
Shell Clingage Factor (bbl/1000 sqft):	0.0060
Average Organic Liquid Density (lb/gal):	6.0670
Tank Diameter (ft):	134.0000
Deck Fitting Losses (lb):	1,153.5256
Value of Vapor Pressure Function:	0.1371
Vapor Molecular Weight (lb/lb-mole):	46.2120
Product Factor:	0.4000
Tot. Roof Fitting Loss Fact.(lb-mole/yr):	455.3000
Deck Seam Losses (lb):	0.0000
Deck Seam Length (ft):	0.0000
Deck Seam Loss per Unit Length Factor (lb-mole/ft-yr):	0.0000
Deck Seam Length Factor(ft/sqft):	0.0000
Tank Diameter (ft):	134.0000
Vapor Molecular Weight (lb/lb-mole):	46.2120
Product Factor:	0.4000
<b>Total Losses (lb):</b>	<b>3,548.3595</b>

Roof Fitting/Status	Quantity	Roof Fitting Loss Factors		m	Losses(lb)
		KFa(lb-mole/yr)	KFb(lb-mole/(yr mph <sup>n</sup> ))		
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1	36.00	5.90	1.20	91.2078
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1	14.00	5.40	1.10	35.4697
Roof Leg or Hanger Well/Adjustable	49	7.90	0.00	0.00	980.7374
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1	12.00	0.00	0.00	30.4026
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1	6.20	1.20	0.94	15.7080

## TANKS 4.0.9d Emissions Report - Detail Format

## Individual Tank Emission Totals

### Emissions Report for: Annual

**4599-06 – 100,000 bbl Internal Floating Roof Tank  
Sidney, Montana**

Components	Losses(lbs)				Total Emissions
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	
RVP 10.34	1,969.08	425.76	1,153.53	0.00	3,548.36

### TANKS 4.0.9d Emissions Report - Detail Format Tank Identification and Physical Characteristics

**Identification**

User Identification: 25,000 Gallon  
 City: Sidney  
 State: Montana  
 Company: Highland Crude  
 Type of Tank: Internal Floating Roof Tank  
 Description: 25K

**Tank Dimensions**

Diameter (ft): 134.00  
 Volume (gallons): 1,050,000.00  
 Turnovers: 284.75  
 Self Supp. Roof? (y/n): Y  
 No. of Columns: 0.00  
 Eff. Col. Diam. (ft): 0.00

**Paint Characteristics**

Internal Shell Condition: Light Rust  
 Shell Color/Shade: White/White  
 Shell Condition: Good  
 Roof Color/Shade: White/White  
 Roof Condition: Good

**Rim-Seal System**

Primary Seal: Mechanical Shoe  
 Secondary Seal: None

**Deck Characteristics**

Deck Fitting Category: Typical  
 Deck Type: Welded

**Deck Fitting/Status**

	Quantity
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1
Roof Leg or Hanger Well/Adjustable	49
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1

Meteorological Data used in Emissions Calculations: Williston, North Dakota (Avg Atmospheric Pressure = 13.82 psia)

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Liquid Contents of Storage Tank**

**4599-06 – 25,000 bbl Internal Floating Roof Tank**  
**Sidney, Montana**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
RVP 10.34	All	43.08	37.17	48.98	41.45	5.8596	N/A	N/A	46.2120			135.96	

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Detail Calculations (AP-42)**

**4599-06 – 25,000 bbl Internal Floating Roof Tank**  
**Sidney, Montana**

Annual Emission Calculations	
Rim Seal Losses (lb):	1,969.0755
Seal Factor A (lb-mole/ft-yr):	5.8000
Seal Factor B (lb-mole/ft-yr (mph) <sup>n</sup> ):	0.3000
Value of Vapor Pressure Function:	0.1371
Vapor Pressure at Daily Average Liquid Surface Temperature (psia):	5.8596
Tank Diameter (ft):	134.0000
Vapor Molecular Weight (lb/lb-mole):	46.2120
Product Factor:	0.4000
Withdrawal Losses (lb):	1,823.6264
Number of Columns:	0.0000
Effective Column Diameter (ft):	0.0000
Annual Net Throughput (gal/yr.):	298,987,500.0000
Shell Clingage Factor (bbl/1000 sqft):	0.0060
Average Organic Liquid Density (lb/gal):	6.0670
Tank Diameter (ft):	134.0000
Deck Fitting Losses (lb):	1,153.5256
Value of Vapor Pressure Function:	0.1371
Vapor Molecular Weight (lb/lb-mole):	46.2120
Product Factor:	0.4000
Tot. Roof Fitting Loss Fact.(lb-mole/yr):	455.3000
Deck Seam Losses (lb):	0.0000
Deck Seam Length (ft):	0.0000

Deck Seam Loss per Unit Length  
 Factor (lb-mole/ft-yr): 0.0000  
 Deck Seam Length Factor(ft/sqft): 0.0000  
 Tank Diameter (ft): 134.0000  
 Vapor Molecular Weight (lb/lb-mole): 46.2120  
 Product Factor: 0.4000

Total Losses (lb): 4,946.2276

Roof Fitting/Status	Quantity	KF <sub>a</sub> (lb-mole/yr)	Roof Fitting Loss Factors		m	Losses(lb)
			KF <sub>b</sub> (lb-mole/(yr mph <sup>1.4</sup> n))			
Access Hatch (24-in. Diam.)/Unbolted Cover, Ungasketed	1	36.00	5.90		1.20	91.2078
Automatic Gauge Float Well/Unbolted Cover, Ungasketed	1	14.00	5.40		1.10	35.4697
Roof Leg or Hanger Well/Adjustable	49	7.90	0.00		0.00	980.7374
Sample Pipe or Well (24-in. Diam.)/Slit Fabric Seal 10% Open	1	12.00	0.00		0.00	30.4026
Vacuum Breaker (10-in. Diam.)/Weighted Mech. Actuation, Gask.	1	6.20	1.20		0.94	15.7080

## TANKS 4.0.9d Emissions Report - Detail Format Individual Tank Emission Totals

### Emissions Report for: Annual

**4599-06 – 25,000 bbl Internal Floating Roof Tank  
Sidney, Montana**

Components	Losses(lbs)				Total Emissions
	Rim Seal Loss	Withdrawal Loss	Deck Fitting Loss	Deck Seam Loss	
RVP 10.34	1,969.08	1,823.63	1,153.53	0.00	4,946.23

## TANKS 4.0.9d Emissions Report - Detail Format Tank Identification and Physical Characteristics

**Identification**

User Identification: 400 BBL  
 City: Sidney  
 State: Montana  
 Company: Highland Crude  
 Type of Tank: Vertical Fixed Roof Tank  
 Description: 400 BBL Tank



**Tank Dimensions**

Shell Height (ft): 20.00  
 Diameter (ft): 12.00  
 Liquid Height (ft) : 20.00  
 Avg. Liquid Height (ft): 10.00  
 Volume (gallons): 16,920.59  
 Turnovers: 90.60  
 Net Throughput(gal/yr): 1,533,000.00  
 Is Tank Heated (y/n): N

**Paint Characteristics**

Shell Color/Shade: Gray/Medium  
 Shell Condition: Good  
 Roof Color/Shade: Gray/Medium  
 Roof Condition: Good

**Roof Characteristics**

Type: Dome  
 Height (ft) 0.00  
 Radius (ft) (Dome Roof) 12.00

**Breather Vent Settings**

Vacuum Settings (psig): -0.03  
 Pressure Settings (psig) 0.03

Meteorological Data used in Emissions Calculations: Williston, North Dakota (Avg Atmospheric Pressure = 13.82 psia)

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Liquid Contents of Storage Tank**

**4599-06 – 400 bbl Vertical Fixed Roof Tank**  
**Sidney, Montana**

Mixture/Component	Month	Daily Liquid Surf. Temperature (deg F)			Liquid Bulk Temp (deg F)	Vapor Pressure (psia)			Vapor Mol. Weight.	Liquid Mass Fract.	Vapor Mass Fract.	Mol. Weight	Basis for Vapor Pressure Calculations
		Avg.	Min.	Max.		Avg.	Min.	Max.					
RVP 10.34	All	49.69	39.44	59.95	44.51	6.5688	5.4961	7.7959	46.2120			135.96	

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Detail Calculations (AP-42)**

**4599-06 – 400 bbl Vertical Fixed Roof Tank**  
**Sidney, Montana**

Annual Emission Calculations	
Standing Losses (lb):	2,026.8267

Vapor Space Volume (cu ft):	1,224.0621
Vapor Density (lb/cu ft):	0.0555
Vapor Space Expansion Factor:	0.3895
Vented Vapor Saturation Factor:	0.2097
Tank Vapor Space Volume:	
Vapor Space Volume (cu ft):	1,224.0621
Tank Diameter (ft):	12.0000
Vapor Space Outage (ft):	10.8231
Tank Shell Height (ft):	20.0000
Average Liquid Height (ft):	10.0000
Roof Outage (ft):	0.8231
Roof Outage (Dome Roof)	
Roof Outage (ft):	0.8231
Dome Radius (ft):	12.0000
Shell Radius (ft):	6.0000
Vapor Density	
Vapor Density (lb/cu ft):	0.0555
Vapor Molecular Weight (lb/lb-mole):	46.2120
Vapor Pressure at Daily Average Liquid	
Surface Temperature (psia):	6.5688
Daily Avg. Liquid Surface Temp. (deg. R):	509.3644
Daily Average Ambient Temp. (deg. F):	41.4292
Ideal Gas Constant R	
(psia cuft / (lb-mol-deg R)):	10.731
Liquid Bulk Temperature (deg. R):	504.1792
Tank Paint Solar Absorptance (Shell):	0.6800
Tank Paint Solar Absorptance (Roof):	0.6800
Daily Total Solar Insulation	
Factor (Btu/sqft day):	1,217.5000
Vapor Space Expansion Factor	
Vapor Space Expansion Factor:	0.3895
Daily Vapor Temperature Range (deg. R):	41.0192
Daily Vapor Pressure Range (psia):	2.2998
Breather Vent Press. Setting Range(psia):	0.0600
Vapor Pressure at Daily Average Liquid	
Surface Temperature (psia):	6.5688
Vapor Pressure at Daily Minimum Liquid	
Surface Temperature (psia):	5.4961
Vapor Pressure at Daily Maximum Liquid	
Surface Temperature (psia):	7.7959
Daily Avg. Liquid Surface Temp. (deg R):	509.3644
Daily Min. Liquid Surface Temp. (deg R):	499.1096
Daily Max. Liquid Surface Temp. (deg R):	519.6192
Daily Ambient Temp. Range (deg. R):	24.7750
Vented Vapor Saturation Factor	
Vented Vapor Saturation Factor:	0.2097
Vapor Pressure at Daily Average Liquid:	
Surface Temperature (psia):	6.5688
Vapor Space Outage (ft):	10.8231
Working Losses (lb):	
Working Losses (lb):	4,136.5976
Vapor Molecular Weight (lb/lb-mole):	46.2120
Vapor Pressure at Daily Average Liquid	
Surface Temperature (psia):	6.5688
Annual Net Throughput (gal/yr.):	1,533,000.0000
Annual Turnovers:	90.6000
Turnover Factor:	0.4978
Maximum Liquid Volume (gal):	16,920.5900
Maximum Liquid Height (ft):	20.0000
Tank Diameter (ft):	12.0000
Working Loss Product Factor:	0.7500
Total Losses (lb):	6,163.4243

**TANKS 4.0.9d**  
**Emissions Report - Detail Format**  
**Individual Tank Emission Totals**

**Emissions Report for: Annual**

**4599-06 – 400 bbl Vertical Fixed Roof Tank**  
**Sidney, Montana**

Components	Losses(lbs)		
	Working Loss	Breathing Loss	Total Emissions
RVP 10.34	4,136.60	2,026.83	6,163.42

## Natural Gas-Fired Heater [SCC 10500206]

Fuel 0.5 mmBtu/hr [Design Maximum - Combined Throughput]  
0.000476 MMscf/hr [Based on 1,050 Btu/scf heating value]  
Operating 8760 hours/year

### Particulate Emissions

Total Particulate PM/PM<sub>10</sub>/PM<sub>2.5</sub>

Emission Factor 7.60 lb/MMscf [AP- 42 Table 1.4-1, 7/98]  
Calculations (7.6 lb/MMscf) \* (0.000476 MMscf/hr) = 0.00361 lbs/hr  
(0.0361 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.0158 TPY

Total Particulate PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions

Emission Factor 5.70 lb/MMscf [AP- 42 Table 1.4-2, 7/98]  
Calculations (5.7 lb/MMscf) \* (0.000476 MMscf/hr) = 0.00271 lbs/hr  
(0.00271 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.0118 TPY

Total Particulate PM/PM<sub>10</sub>/PM<sub>2.5</sub> Emissions (filterable):

Emission Factor 1.90 lb/MMscf [AP- 42 Table 1.4-2, 7/98]  
Calculations (1.9 lb/MMscf) \* (0.000476 MMscf/hr) = 0.000904 lbs/hr  
(0.000904 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.00396 TPY

### CO Emissions (uncontrolled):

Emission Factor 84.00 lb/MMscf [AP- 42 Table 1.4-1, 7/98]  
Calculations (84 lb/MMscf) \* (0.000476 MMscf/hr) = 0.0399 lbs/hr  
(0.0399 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.175 TPY

### NO<sub>x</sub> Emissions (uncontrolled):

Emission Factor 100.00 lb/MMscf [AP- 42 Table 1.4-1, 7/98]  
Calculations (100 lb/MMscf) \* (0.000476 MMscf/hr) = 0.0476 lbs/hr  
(0.0476 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.208 TPY

### SO<sub>2</sub> Emissions (uncontrolled):

Emission Factor 0.60 lb/MMscf [AP- 42 Table 1.4-2, 7/98]  
Calculations (0.6 lb/MMscf) \* (0.000476 MMscf/hr) = 0.000286 lbs/hr  
(0.000286 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.00125 TPY

### VOC Emissions (uncontrolled):

Emission Factor 5.50 lb/MMscf [AP- 42 Table 1.4-2, 7/98]  
Calculations (5.5 lb/MMscf) \* (0.000476 MMscf/hr) = 0.00261 lbs/hr  
(0.00261 lbs/hr) \* (8760 hrs/yr) \* (0.0005 tons/lb) = 0.0114 TPY

## Emergency Generator - 8 kW Propane-Fired [SCC 20201001]

Fuel 62 ft<sup>3</sup>/hr [Manufacturer Specification @ 100% Load]  
0.15624 MMBtu/hr [Propane Heating Value = 2520 Btu/ft<sup>3</sup>]  
Operating 8760 hours/year

Basis:

→ Utilized emission factors from AP-42 3.2 Natural Gas-Fired

- 4SLB Engine to provide a for worst case NO<sub>x</sub> Emissions Scenario [AP- 42 Table
- Worst case emission factor selected (< 90%
- Worst case emission factor selected (< 90% - 105% Load)

**Particulate Emissions (uncontrolled):**

PM Emissions - filterable: (All PM assumed to be ≤ PM<sub>2.5</sub>)

Emission Factor	0.0000771 lb/MMBtu	[AP- 42 Table	
Calculations	(0.0000771 lb/MMBtu) * (MMBtu/hr)		0.00001 lbs/hr
	(0.00001 lbs/hr) * ( hrs/yr) * (0.0005 tons/lb) =		0.00005 TPY

PM Emissions - condensable: (All PM assumed to be ≤ PM<sub>2.5</sub>)

Emission Factor	0.00991 lb/MMBtu	[AP- 42 Table	
Calculations	(0.00991 lb/MMBtu) * (MMBtu/hr) =		0.00155 lbs/hr
	(0.00155 lbs/hr) * ( hrs/yr) * (0.0005 tons/lb) =		0.00678 TPY

Total PM Emissions:

Calculations	PM Condensable + PM		0.001560 lbs/hr
	(0.00155 lbs/hr) * ( hrs/yr) * (0.0005		0.00683 TPY

**CO Emissions (uncontrolled):**

Emission Factor	0.557 lb/MMBtu* 3.2-3, 7/00]	[AP- 42 Table	
Calculations	(0.557 lb/MMBtu) * (0.15624 MMBtu/hr) =		0.087026 lbs/hr
	(0.09 lbs/hr) * (8760 hrs/yr) * (0.0005 tons/lb) =		0.381172 TPY

**NO<sub>x</sub> Emissions (uncontrolled):**

Emission Factor	4.08 lb/MMBtu*	[AP- 42 Table	
Calculations	(4.08 lb/MMBtu) * (MMBtu/hr) =		0.63746 lbs/hr
	(0.64 lbs/hr) * ( hrs/yr) * (0.0005 tons/lb) =		2.79207 TPY

**SO<sub>2</sub> Emissions (uncontrolled):**

Emission Factor	0.000588 lb/MMBtu	[AP- 42 Table	
Calculations	(0.000588 lb/MMBtu) * (MMBtu/hr) =		0.00009 lbs/hr
	(0.00 lbs/hr) * ( hrs/yr) * (0.0005 tons/lb) =		0.00040 TPY

**VOC Emissions**

Emission Factor	0.118 lb/MMBtu	[AP- 42 Table	
Calculations	(0.12 g/bhp-hr) * ( hp) * 0.002205 lb/gram) =		0.01844 lbs/hr
	(0.02 lbs/hr) * ( hrs/yr) * (0.0005 tons/lb) =		0.08075 TPY

**Unpaved Roadways (Haul Roads)**

Miles 17878 Annual Vehicle Miles Travelled  
 Vehicle 39.1 Tons [Mean Vehicle Weight: 45 tons Loaded & 18.8 tons empty]  
 Control Method: Water Application  
 Control Efficiency 50%

## Mileage

	Number of Tanks	Individual Tank [bbl/Yr]	Total Throughput [bbl]	No. Loads	VMT
100,000 bbl	1	1,661,778	1,661,778	5830.8	1457.7
25000 bbl	2	7,118,691	14,237,382	49955.73	12488.93
400 bbl (1)	15	225752	3386280	11881.68	2970.42
400 bbl (2)	4	273750	1095000	3842.11	960.53
Facility Totals ►			9073710	71511	17877.58

## Particulate Emissions

Emission Factor	$EF = k(s/12)^a * (W/3)^b$	[AP-42 13.2.2.2, 11/06]
	where: EF, Emission Factor = lbs Emitted Per Vehicle Mile Traveled (VMT)	
	k, Empirical Constant PM =	4.9
	k, Empirical Constant PM <sub>10</sub> =	1.5
	k, Empirical Constant PM <sub>2.5</sub> =	0.15
	s, Surface Material Silt Content	13.5
	W, Mean Vehicle Weight (tons)	39.1
	a, Empirical Constant PM =	0.7
	a, Empirical Constant PM <sub>10</sub>	0.9
	b, Empirical Constant PM -	0.45

### PM Emissions:

Emission Factor  $EF = 4.9 * (13.5/12)^{0.7} * (39.1/3)^{0.45} = 15.42 \text{ lbs/VMT}$   
 Calculations  $(15.42 \text{ lbs/VMT}) * (17878 \text{ VMT/year}) * (1-.50 \text{ Ce}) (365-80)/365 * 1\text{ton}/2000\text{lbs} = 53.80 \text{ tons/year}$

### PM<sub>10</sub> Emissions:

Emission Factor  $EF = 1.5 * (13.5/12)^{0.7} * (39.1/3)^{0.45} = 4.83 \text{ lbs/VMT}$   
 Calculations  $(4.83\text{lbs/VMT}) * (17878 \text{ VMT/year}) * (1-.50 \text{ Ce})(365-80)/365 * 1\text{ton}/2000\text{lbs} = 16.86 \text{ tons/year}$

### PM<sub>2.5</sub> Emissions:

Emission Factor  $EF = 0.15 * (13.5/12)^{0.9} * (39.1/3)^{0.45} = 0.45 \text{ lbs/VMT}$   
 Calculations  $(0.45 \text{ lbs/VMT}) * (17878 \text{ VMT/year}) * (1-.50 \text{ Ce}) (365-80)/365 * 1\text{ton}/2000\text{lbs} = 1.57 \text{ tons/year}$

V. Existing Air Quality

The Albin station is located in the Southwest ¼ of the Southwest ¼ of Section 25, Township 24 North, Range 56 East in Richland County, Montana. Eastern Montana generally provides for very good ventilation throughout the year. The area is designated unclassified/attainment with all ambient air quality standards and there are no major air pollution sources in the surrounding area.

VI. Air Quality Impacts

The Department determined that the impacts from this permitting action will be minor. The Department believes it will not cause or contribute to a violation of any ambient air quality standard.

VII. Ambient Air Impact Analysis

The current permit action will result in a minor increase in emissions from the facility. Therefore, the Department believes the current permit action will not cause or contribute to a violation of any ambient air quality standard.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

YES	NO	
X		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	X	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	X	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	X	4. Does the action deprive the owner of all economically viable uses of the property?
	X	5. Does the action require a property owner to dedicate a portion of property or to grant an easement? [If no, go to (6)].
		5a. Is there a reasonable, specific connection between the government requirement and legitimate state interests?
		5b. Is the government requirement roughly proportional to the impact of the proposed use of the property?
	X	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	X	7. Does the action damage the property by causing some physical disturbance with respect to the property in excess of that sustained by the public generally?
	X	7a. Is the impact of government action direct, peculiar, and significant?
	X	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	X	7c. Has government action lowered property values by more than 30% and necessitated the physical taking of adjacent property or property across a public way from the property in question?
	X	Takings or damaging implications? (Taking or damaging implications exist if YES is checked in response to question 1 and also to any one or more of the following questions: 2, 3, 4, 6, 7a, 7b, 7c; or if NO is checked in response to questions 5a or 5b; the shaded areas)

Based on this analysis, the Department determined there are no taking or damaging implications associated with this permit action.

IX. Environmental Assessment

An environmental assessment, required by the Montana Environmental Policy Act, was completed for this project. A copy is attached.



**DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**Air, Energy & Mining Division**  
**Air Quality Bureau**  
**P.O. Box 200901, Helena, Montana 59620**  
**(406) 444-3490**

**ENVIRONMENTAL ASSESSMENT (EA)**

*Issued To:* Highland Crude, LLC

*Montana Air Quality Permit Number:* 4599-06

*EA Draft:* 10/19/2017

*EA Final:* 11/6/2017

*Permit Final:* 11/22/2017

1. *Legal Description of Site:* Southwest ¼ of the Southwest ¼ of Section 25, Township 24 North, Range 56 East in Richland County, Montana.
2. *Description of Project:* Highland Crude, LLC (Highland) requested a reductions in crude oil throughput through tanks A1-A6 and AE1-AE13, as well as updating their potential to emit (PTE) using a Reid Vapor Pressure (RVP) value of 10.34. The project also corrects the description of Highland’s heaters from 500 British Thermal Units (BTU) per hour to 500,000 BTU per hour, as well as updates their potential emissions calculations.
3. *Objectives of Project:* The objectives of the project are to update Highland’s permit using lab derived RVP value to get more accurate Potential to Emit (PTE).
4. *Alternatives Considered:* In addition to the proposed action, the Department also considered the “no-action” alternative. The “no-action” alternative would not use the new Reid Vapor Pressure value of 10.34 and greatly underestimate Highland’s PTE from the crude oil storage tanks. The no-action alternative would also underestimate the PTE for the heaters. These two factors could cause Highland to have a PTE in excess of Title V major source thresholds, thus requiring Highland to obtain a Title V operating permit and resulting in possible enforcement action for not holding one. However, the Department does not consider the “no-action” alternative to be appropriate because Highland demonstrated compliance with all applicable rules and regulations as required for permit issuance and for establishing enforceable permit conditions that would prevent a major source designation. Therefore, the “no-action” alternative was eliminated from further consideration.
5. *A Listing of Mitigation, Stipulations, and Other Controls:* A list of enforceable conditions, including a BACT analysis, would be included in MAQP #4599-06.
6. *Regulatory Effects on Private Property:* The Department considered alternatives to the conditions imposed in this permit as part of the permit development. The Department determined that the permit conditions are reasonably necessary to ensure compliance with applicable requirements and demonstrate compliance with those requirements and do not unduly restrict private property rights.

7. *The following section summarizes the potential physical and biological effects of the proposed project on the human environment.*
8. *The “no-action” alternative was discussed previously.*

SUMMARY OF COMMENTS ON POTENTIAL PHYSICAL AND BIOLOGICAL EFFECTS:  
The following comments have been prepared by the Department.

A. *Terrestrial and Aquatic Life and Habitats*

There will be no new habitat destruction as a result of this project. Further, because the facility is an existing industrial site, terrestrials that routinely inhabit the area are accustomed to the industrial character of the facility. There will be no impact to terrestrial and aquatic life and habitats from the proposed project.

B. *Water Quality, Quantity and Distribution*

The proposed project would not result in any impacts to water quantity or distribution in the area of operation because there is no change in water use related to the project.

C. *Geology and Soil Quality, Stability and Moisture*

The actions addressed in this permit would not change the soil stability, quality, moisture, or geologic substructure. The proposed changes would not result in impacts to productivity or fertility at or near the site. No unique geologic or physical features would be disturbed. Therefore, no impact to geology or soil quality, stability, and moisture would occur.

D. *Vegetation Cover, Quantity, and Quality*

Currently, the surrounding area is commercial and industrial. The current permit action would take place in the existing facility, and would not involve any changes to existing crude oil storage tanks. There would be no impacts to vegetation cover, quality, or quality associated related to the project.

E. *Aesthetics*

The site is an established crude oil storage and distribution facility near the town of Sidney, Montana. The proposed project at this existing facility would not alter any scenic vista or create any additional noise at the site. There would be no impacts to aesthetics associated with this project because there is no proposed construction.

F. *Air Quality*

The Highland facility is located in an area considered unclassified/attainment for all National and Montana Ambient Air Quality Standards (NAAQS and MAAQS). MAQP #4599-06 would limit any increase in the amount of allowable emission of pollutants. There would be no impacts to air quality because there will be no proposed increases in emissions from the facility.

G. *Unique Endangered, Fragile, or Limited Environmental Resources*

Because the project is to update emissions calculations and reduce allowable crude throughput to accommodate the updated emissions calculations, there would be no impacts to unique endangered, fragile, or limited environmental resources associated with this project because there would be no new physical changes to the facility.

H. *Sage Grouse Executive Order*

The Department recognizes that the site location is not within the Greater Sage Grouse habitat area as defined by Executive Order No. 12-2015.

I. *Demands on Environmental Resource of Water, Air and Energy*

No significant demands would be placed on environmental resources such as water, air and energy. The proposed project would occur in an existing facility. Overall, there would be no significant additional demands for environmental resources of water, air, and energy.

J. *Historical and Archaeological Sites*

Since this facility is an already existing site, and the facility property would not be expanded by the proposed project, no effects on historical and archeological findings are expected to occur.

K. *Cumulative and Secondary Impacts*

As previously described in this environmental assessment, no significant impacts to the individual considerations above are expected. There would be no cumulative impacts associated with the project because there are no new construction activated proposed with the project. In addition, the proposed project would not result in any known secondary impacts.

Air pollution from the facility would be controlled by MAQP #4599-06. This facility would be expected to operate in compliance with all applicable rules and regulations as outlined in MAQP #4599-06.

9. *The following section summarizes the potential economic and social effects of the proposed project on the human environment. The “no-action” alternative was discussed previously.*

SUMMARY OF COMMENTS ON POTENTIAL ECONOMIC AND SOCIAL EFFECTS: The following comments have been prepared by the Department.

A. *Social Structures and Mores*

The proposed project would not cause a disruption to any native or traditional lifestyles or communities in the area as the site is an existing facility and the proposed project does not change the purpose or means of operation of the crude oil storage and distribution or expand upon the facility boundary. Therefore, use of the immediate surrounding area would be expected to remain the same.

B. *Cultural Uniqueness and Diversity*

The proposed project would not be expected to cause a change in the cultural uniqueness and diversity of the area because the site is an existing facility and is currently used predominantly for industrial purposes. Further, the proposed project would not change the existing industrial character of the area.

C. *Local and State Tax Base and Tax Revenue*

The proposed changes would not have an effect on the local and state tax base and tax revenue because Highland Crude would not hire any additional employees and therefore would not add to the overall income base of the area. Further, production rates and capabilities would decrease as a result of this project.

D. *Agricultural or Industrial Production*

Because the proposed project would operate within the existing boundaries of the Highland Crude facility, the project would not be expected to displace or otherwise affect any agricultural land or practices.

E. *Human Health*

MAQP #4599-06 would incorporate conditions to ensure that the facility would be operated in compliance with all applicable rules and standards. These rules and standards are designed to be protective of human health.

F. *Access to and Quality of Recreational and Wilderness Activities*

The proposed operations would not be expected to affect any access to or quality of any recreational or wilderness activities in the area because the site is an existing facility which currently operates for industrial purposes.

G. *Quantity and Distribution of Employment*

The proposed project would not be expected to affect the quantity and distribution of employment in the area. The proposed project would not increase the number of permanent employees at the plant.

H. *Distribution of Population*

The proposed operations would not be expected to increase the normal population distribution in the area because the number of permanent employees would not increase as a result of the proposed project.

I. *Demands for Government Services*

Government services would be required for acquiring the appropriate permits from government agencies (including a state air quality permit). In addition, the permitted source of emissions would be subject to periodic inspections by government personnel. Therefore, the project would have a minor effect on the demands of government services.

J. *Industrial and Commercial Activity*

No additional industrial or commercial activity is expected as a result of the proposed changes because the site is an existing facility, which is an industrial operation.

K. *Locally Adopted Environmental Plans and Goals*

The Department is not aware of any locally adopted environmental plans or goals that would be affected by the current permit action. The state standards would protect the proposed site and the environment surrounding the site.

L. *Cumulative and Secondary Impacts*

Overall, cumulative and secondary impacts from the proposed project on the economic and social resources of the human environment in the immediate area would be minor due to the fact that the proposed area of operation would take place at an existing industrial operation, the predominant use of the surrounding area would not change as a result of the modified operations. In addition, the proposed project would not result in any known secondary impacts.

The amount of allowable air pollution from the facility would be limited by MAQP #4599-06. This facility would be expected to operate in compliance with all applicable rules and regulations as outlined in MAQP #4599-06.

Recommendation: No Environmental Impact Statement (EIS) is required.

If an EIS is not required, explain why the EA is an appropriate level of analysis: MAQP #4599-06 includes conditions and limitations to ensure the facility will operate in compliance with all applicable rules and regulations. In addition, there are no significant impacts associated with this proposal.

Other groups or agencies contacted or which may have overlapping jurisdiction: Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

Individuals or groups contributing to this EA: Department of Environmental Quality – Air Quality Bureau, Montana Historical Society – State Historic Preservation Office, Natural Resource Information System – Montana Natural Heritage Program

EA prepared by: John P. Proulx

Date: 10/13/2017