MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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Montana Refining Company
NE¼, Section 1, Township 20 North, Range 3 East, Cascade County
1900 10th Street North East
Great Falls, MT 59404

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

Facility Compliance Requirements	Yes	No	Comments
Source Tests Required	X		Methods 5, 6, 7, 9, 10, and 22
Ambient Monitoring Required	X		Sulfur dioxide (SO_2)
Continuous Opacity Monitoring System (COMS) Required	X		Fluid Catalytic Cracking Unit (FCCU)
Continuous Emission Monitoring System (CEMS) Required	X		FCCU - SO_2, oxides of nitrogen (NO_x), carbon monoxide (CO); Refinery Fuel Gas (RFG) – hydrogen sulfide (H_2S); Sour Water Stripper Overhead (SWSOH) - H_2S or SO_2; and Boilers #1 and #2 – SO_2, Oxygen (O_2)
Continuous Parameter Monitoring System (CPMS)	X		Gasoline Truck Loading Rack and Gasoline Railcar Loading Rack (temperature)
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		
Monthly Reporting Required		X	
Quarterly Reporting Required	X		
Applicable Air Quality Programs			
ARM Subchapter 7 Montana Air Quality Permitting	X		MAQP # 2161-23
New Source Performance Standards (NSPS)	X		40 CFR 60, Subparts J, Kb, UU, GGG, QQQ
National Emission Standards for Hazardous Air Pollutants (NESHAPS)	X		40 CFR 61, Subpart M, FF, J and V
Maximum Achievable Control Technology (MACT)	X		40 CFR 63, Subparts CC, UUU, and EEEE
Major New Source Review (NSR/Prevention of Significant Deterioration (PSD))	X		
Risk Management Plan Required (RMP)	X		
Acid Rain Title IV		X	
State Implementation Plan (SIP)	X		General Montana SIP

TABLE OF CONTENTS

SECTION I GENERAL INFORMATION 3

A. PURPOSE 3
B. FACILITY LOCATION 3
C. FACILITY BACKGROUND INFORMATION 3
D. CURRENT PERMIT ACTION 11
E. TAKING AND DAMAGING ANALYSIS 11
F. COMPLIANCE DESIGNATION 12

SECTION II SUMMARY OF EMISSION UNITS 13

A. FACILITY PROCESS DESCRIPTION 13
B. EMISSION UNITS AND POLLUTION CONTROL DEVICE IDENTIFICATION 13
C. CATEGORICALLY INSIGNIFICANT SOURCES/ACTIVITIES 14

SECTION III PERMIT CONDITIONS 15

A. EMISSION LIMITS AND STANDARDS 15
B. MONITORING REQUIREMENTS 15
C. TEST METHODS AND PROCEDURES 16
D. RECORDKEEPING REQUIREMENTS 16
E. REPORTING REQUIREMENTS 16
F. PUBLIC NOTICE 17
G. DRAFT PERMIT COMMENTS 17

SECTION IV NON-APPLICABLE REQUIREMENT ANALYSIS 18

SECTION V FUTURE PERMIT CONSIDERATIONS 19

A. MACT STANDARDS 19
B. NESHAP STANDARDS 19
C. NSPS STANDARDS 19
D. RISK MANAGEMENT PLAN 19
E. COMPLIANCE ASSURANCE MONITORING (CAM) PLAN 19

SECTION I GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emission units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the U.S. Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the significant modification application submitted by Montana Refining Company (MRC) and received by the Department on 7/09/09 in addition to other information submitted on 7/24/09 6/9/08, 7/2/08, and 12/19/08; as well as the previous operating permits which were based on submittals received on 5/17/95, 7/3/95, 10/26/95, 4/14/98, 6/29/99, 7/22/99, 4/4/00, 5/4/00, 8/4/01, 8/17/02, 3/19/03, 7/10/03, 5/3/04, and 6/5/06.

B. Facility Location

MRC operates the Great Falls refinery, which is located along the Missouri River in Great Falls, Montana. This facility is located in the NE¼ of Section 1, Township 20 North, Range 3 East, in Cascade County, Montana. The air quality of Cascade County is considered attainment/unclassified for all pollutants. Until recently, a narrow area along 10th Avenue South (bounded by 9th Avenue South on the north, 11th Avenue South on the south, 54th Street South on the east and 2nd Street South on the west) in Great Falls was classified as a non-attainment area for CO but has since been re-designated to attainment area status under a limited maintenance plan. This re-designation became effective on July 8, 2002. The area lies in a region that is transitional between mountains to the west and plains to the east. Potential sensitive areas include schools, residential areas, parks, dams, and recreational areas.

C. Facility Background Information

On December 2, 1985, the Montana Department of Health and Environmental Sciences and MRC signed a stipulation requiring MRC to obtain an air quality permit, and stipulated that a permit emission limitation of 4,700 tons per year (TPY) CO would constitute compliance with ambient CO standards. MRC submitted this permit with the intentions of permitting its existing refining operations, including all equipment not already permitted.

On October 20, 1985, MRC was granted a general permit for their petroleum refinery and major refinery equipment located in Great Falls, Cascade County, Montana. The application was given **Montana Air Quality Permit (MAQP) #2161**.

The first alteration to the original permit was given **MAQP #2161-A** and was issued on May 31, 1989. This alteration involved the addition of a deisobutanizer reboiler.

The second alteration was given **MAQP #2161-A1** and was issued on March 12, 1990. This project involved the installation of one (1) 30,000-barrel gasoline storage tank and one (1) 40,000-barrel crude oil storage tank at the present facility. Both tanks were to be installed with external floating roof control.

The third alteration was given **MAQP #2161-A3** and was issued on December 18, 1990. This alteration consisted of the installation of a Hydrofluoric Acid Alkylation Unit, internal floating roofs at existing storage tanks, which had fixed roofs, and a safety flare.

The fourth alteration was given **MAQP #2161-04** and was issued on June 16, 1992. This alteration consisted of the installation of a sodium hydrosulfide (NaHS) unit at the existing Great Falls Refinery. The NaHS unit receives refinery fuel gas (540,000 standard cubic feet per day (scf/day) maximum rated capacity) containing hydrogen sulfide (H_2S) and reacts this fuel with a sodium hydroxide caustic solution to remove virtually 100% of the H_2S by converting it to NaHS, a saleable product.

The resultant sweet fuel gas is burned, as before, in other process heaters; however, since the fuel gas contains virtually no H_2S, sulfur dioxide (SO_2) emissions from the process heaters, assuming no other changes, decrease by nearly 60 percent. There was no decrease in permitted SO_2 emissions from this permit because the refinery wanted to retain the existing permitted SO_2 emission limitations so it could charge less expensive, higher sulfur crude oil.

In the basic process, off-gases from product desulfurizing processes (fuel gases) are contacted with a caustic solution in a gas contractor. The resultant reaction solution is continually circulated until the caustic solution is essentially used up; NaHS product is then sent to storage. Make-up caustic is added to the process as required. The process requires a gas contractor, process heat exchanger, circulation pump, storage tanks for fresh caustic and NaHS product, 12 pipeline valves, 4 open ended valves, 21 flanges, and other process control equipment.

The only process emissions will be fugitive Volatile Organic Compounds (VOCs) from equipment (valves and flanges) in fuel gas stream service. To estimate unit VOC emissions, emission factors developed by EPA for equipment in gas vapor service with measured emissions from 0 to 1,000 parts per million (ppm) are used. With an aggressive monitoring and maintenance program, fugitive VOC emissions from valves and flanges will be within this 0 to 1,000-ppm range. Total annual fugitive VOC emissions from the sodium hydrosulfide unit are estimated to be 20 pounds per year.

The tank that is to be used to store NaHS product was in jet fuel service. When taken out of jet fuel service, this tank (#35) will no longer be a source of VOC emissions; the reduction in VOC emissions will be 2,270 pounds per year. Considering the 2,270-pound-per-year decrease due to tank #35 service change, the refinery will realize a net decrease in annual VOC emissions of 2,250 pounds or 1.1 TPY.

The fifth alteration was given **MAQP #2161-05** and was issued on October 15, 1992. This permit alteration was for the construction and operation of two (2) 20,000-barrel capacity aboveground storage tanks at its Great Falls Refinery. The new tanks contain heavy naphtha (#127) and raw diesel (#128).

Each tank is constructed of metal sections welded together and rests on a concrete ring wall foundation. External floating roofs with dual seals are installed on each tank for VOC control.

On April 6, 1993, MRC was granted **MAQP # 2161-06** to construct and operate a hydrodesulfurization (HDS) unit and hydrogen plant. This sixth alteration was required to go through PSD review for NO_x and was deemed complete on February 22, 1993. The HDS project is designed to process 5,000 barrels per day of diesel/gas oil and to reduce the sulfur content to 0.05 weight percent. The reduction of sulfur in diesel fuel and gasoline are mandated by the 1990 Clean Air Act Amendments and must be accomplished by October 1993 and 1995, respectively. The current desulfurizer unit operated by MRC was limited in size and the throughput capacity to approximately 1,400 barrels per day.

This new HDS project consisted of an HDS process unit and heater, hydrogen plant with reformer heater, and the removal of storage tanks #40 through #43. Tanks #40 and #41, which currently process gas oil, would be discontinued. Tanks #42 and #43, which process raw diesel, would be discontinued. Tanks #44 and #111, which currently service naphtha, are now be used for gas oil. Tank #45, which services JP-4, is used for gas oil.

On July 28, 1993, **MAQP #2161-07**, a modification to MRC's air quality permit, was issued to change the emission control requirements of Section II.A.4.d.i., titled "Pressure Vessels."
In a system where the valves relieve to atmosphere, rupture discs can prevent emissions in the event of relief valve leakage. In hydrogen fluoride (HF) systems, they can provide some protection from acid corrosion on the relief valve and acid salt formation. Except where HF acid is present, rupture discs do not provide any additional protection; nor do they prevent any release of air contaminates in a closed relief system.

In heavy liquid service, rupture discs can be safety hazards by partial failure or leaking and changing, over time, the differential pressure required to provide vessel protection. Therefore, only pressure vessels in HF Acid service shall be equipped with rupture discs upstream of the relief valves and all except storage tanks shall be vented to the flare system.

Also, the allowable particulate emission limitation for MRC's FCC unit was corrected to reflect the maximum allowable emissions based on the process weight rule (Administrative Rules of Montana (ARM) 17.8.310). The maximum allowable emissions were calculated to be 234.53 TPY using a catalyst circulation rate of 125 tons per hour (TPH).

MRC requested **MAQP** Modification **#2161-08** to remove the alkylation unit and tanks #127 and #128 from new source performance standards (NSPS) status because they were erroneously classified as affected facilities under NSPS when originally permitted. This request for modification was submitted on August 11, 1993, and issued on January 6, 1994.

When MRC applied for the preconstruction permit to build the HF Alkylation Unit in 1990, it was presumed, since this unit was new to MRC, it automatically fell under NSPS as new construction. Subsequently, it has been determined that if a source is moved as a unit from a location where operation occurred (Garden City, Kansas) to another location, it must meet the definition of reconstruction or modification in order to trigger NSPS applicability.

The alkylation plant was originally constructed in Garden City, Kansas during 1959 - 1960 and moved, in its entirety, to Great Falls and installed. Since the unit was originally constructed before the NSPS-affected date of January 5, 1981, it does not meet the criteria for construction date of a new source under 40 CFR, Subpart GGG or Subpart QQQ.

The project does not meet the criteria under reconstruction because no capital equipment was replaced when the unit was relocated. The replacement work performed as the unit was moved amounted to pump seals, valve packing, bearings, small amounts of corroded piping, and some heat exchanger tubes and bundles, all of which are done routinely as maintenance. The VOC emitters, such as valve packing and pump seals, were upgraded to meet Best Available Control Technology (BACT).

Along the same line, tanks #127 and #128 were originally constructed at Cody, Wyoming in 1960 and relocated to Great Falls in 1993. The only change was the modification of the roof seals to double seals to meet BACT. This cost a total of $15,000 for both tanks as compared to more than $500,000 if two new tanks were to be built.

Also, on October 28, 1993, MRC submitted a permit application to alter the existing permit. This modification and alteration of the existing permit was assigned MAQP #2161-08. MRC proposed to construct and operate a 3,500 barrel-per-day asphalt polymerization unit. The unit would enable MRC to produce a polymerized asphalt product that meets future federal specifications for road asphalt, as well as supply polymerized asphalt to customers that currently wish to use the product.

The proposed unit consists of two circuits: the asphalt circuit and the hot oil circuit. In the asphalt circuit, polymerization occurs in a 1,000-barrel steel, vented mix tank. Product blending and storage occurs in three steel, vented 1,000-barrel tanks identified as A, B, and C on the attached flow diagram. Existing Tanks 55 and 56 (3,000 barrels each) will remain in asphalt service and will be used for storage. In

addition to the above equipment, the asphalt circuit also consists of four (4) pumps and approximately 47 standard valves. All the above equipment is in asphalt service and, except for Tanks 55 and 56, are new. To maintain the asphalt at the optimum temperature in the storage and blending tanks, a hot circuit is utilized. Hot oil (heavy fuel oil) is heated in an existing permitted process heater (Tank 56 heater) and circulated through coils in the process tankage. No change in the method of operation of the heater was anticipated. A steel, vented hot-oil storage/supply tank is used to maintain the required amount of hot oil in the unit. In addition to the process heater and storage/supply tank, the hot-oil circuit consists of one (1) pump and approximately 56 standard valves. The above equipment is in hot-oil service and, except for the heater, is new.

An annual emissions increase of 7.3 TPY of VOC is expected due to operation of the unit. The unit is only anticipated to be operated 6 months of the year. These emissions will occur from the vented hot-oil tank and the valves and pump in hot-oil service.

MAQP #2161-09 was issued on September 6, 1994, and included a change in the method of heating three previously permitted polymer modified asphalt tanks. As previously permitted, these tanks were to have been heated utilizing circulating hot oil. The tanks are now heated individually using natural gas fired fire-tube heaters. This eliminated the hot-oil circuit, including the hot-oil storage tank, entirely.

Since the initial permit application for the modified asphalt unit, several small design changes have occurred involving the addition of a new 800-gallon wetting tank, which are in asphalt service. Also added was an output line from existing Tank #69 (Tall Oil). This output line added approximately 12 new valves and one new pump, all in Tall Oil service, to the unit. All other valves and pumps were designated to be in asphalt service. All VOC emissions from equipment and tanks in asphalt service were assumed to be negligible, since asphalt has negligible vapor pressure at the working temperatures seen in the unit.

MAQP #2161-10, for the installation of an additional boiler (Boiler #3) to provide steam for the facility, was never issued as a final permit. On May 28, 1997, the Department of Environmental Quality (Department) received a letter requesting the withdrawal of the permit and the withdrawal was granted to MRC.

MAQP #2161-11 was issued on January 23, 1998, for the installation of a vapor collection system and enclosed flare for the reduction of Hazardous Air Pollutants (HAPs) resulting from the loading of gasoline. This was done in order to comply with the gasoline loading rack provisions of 40 CFR 63, Subpart CC - National Emission Standards for Petroleum Refineries. A vapor combustion unit (VCU) was added to the truck loading rack. The gasoline vapors is collected from the trucks during loading then routed to an enclosed flare where combustion occurs. The result of this project was an overall reduction in the amount of VOCs and HAPs emitted, and a slight increase in CO and NO_x emissions.

Because MRC's Bulk gasoline and distillate truck loading tack VCU is defined as an incinerator under MCA 75-2-215, a determination that the emissions from the VCU will constitute a negligible risk to public health was required prior to the issuance of a permit to the facility. MRC and the Department identified the following hazardous air pollutants from the flare, which were used in the health risk assessment. These constituents are typical components of MRC's gasoline.

1. Benzene
2. Toluene
3. Ethyl Benzene
4. Xylenes
5. Hexane
6. 2,2,4 Trimethlypentane
7. Cumene
8. Napthalene
9. 1,3 Butadiene

MRC demonstrated compliance with the negligible risk requirement.

MRC requested, via a letter dated August 13, 1997, permitted changes to administratively and technically correct MAQP #2161-09. These changes were necessary as a result of the withdrawal of MAQP #2161-10. The changes included correctly stating opacity limits relating to asphalt storage tanks, removing references to procedural rules, changing monitoring requirements for the Diesel/Gas Hydrotreater (HTU) sour water stripper (SWS) and changing performance specifications for the continuous H_2S monitoring system. Because MRC had applied for a permit alteration on October 21, 1997, for the loading rack VCU the draft modification was addressed in the permit alteration request.

MAQP #2161-12 was not issued. MRC applied for a modification on February 18, 1998, and this action was given MAQP #2161-12. On February 27, 1998, the Department notified MRC that the permitting actions requested would require an alteration and that a complete preconstruction permit application would be required.

MAQP #2161-13 placed enforceable emissions limits on the facility, both plant-wide and on the #1 and #2 boilers. The emission limits have been shown, through the use of EPA approved models, to protect the NAAQS for sulfur dioxide.

The continuous gas flow meters being installed in the vacuum heater and the crude heater were placed in the permit as a requirement. Also, the #1 and #2 boilers limits were updated to allow MRC more flexibility in their operations. The limits were originally placed on the boilers to keep MRC below the PSD permitting threshold. The new limits maintain the status below the PSD permitting threshold.

The monitoring location was identified in the permit's Attachment 1, Ambient Air Monitoring Plan. The current location was determined to be inappropriate after reviewing the modeling analysis, and the new location is approximately 1.2 km from its present location. The monitoring location was chosen based on the modeling analysis that was submitted and is required to provide confirmation of compliance with the State SO_2 standards. The Department will work with MRC for the final exact siting of the monitor. The method numbers for examination of water and wastewater were updated in Section II.C and Attachment 2. MAQP #2161-13 replaced MAQP #2161-11.

On August 4, 2001, the Department issued **MAQP #2161-14** for the installation and operation of five 1600-kW diesel-powered, temporary generators. These generators were necessary because of the current high cost of electricity. The generators would only operate for the length of time necessary for MRC to acquire a permanent, more economical, supply of power. Further, the generators are limited to a maximum operating period of 2 years.

Because these generators would only be used when commercial power is cost prohibitive, the amount of emissions expected during actual operation is minor. In addition, because the permit limits the operation of these generators to a time period of less than 2 years, the installation and operation qualifies as a "temporary source" under the PSD permitting program. Therefore, the proposed project does not require compliance with ARM 17.8.804, 17.8 820, 17.8.822, and 17.8.824. Even though the portable generators are considered temporary, the Department requires compliance with BACT and public notice requirements; therefore, compliance with ARM 17.8.819 and 17.8.826 will be ensured. Finally, MRC is responsible for complying with all applicable ambient air quality standards.

On August 17, 2002, the Department issued **MAQP #2161-15** to eliminate the summer boiler SO_2 emission limits (both the plant-wide and 24-hour average) and redefine the winter limits as year-round limits. The seasonal limits were originally placed in the permit to allow MRC more flexibility when operating the boilers. Both the winter and summer scenarios were supported by ambient air quality modeling performed prior to MAQP #2161-13 being issued. The winter limit being redefined as a year-round limit does not represent an increase in SO_2 emissions from the boilers or any other emitting point.

In addition, the Department removed requirements to determine and report NO_x emissions both from the crude heater (due to the old SWS) and refinery wide, as these sources are not subject to NO_x emissions limitations. The requirements appeared to have been inadvertently applied through an administrative error. MRC already provides refinery-wide NO_x emissions as part of its annual emission inventory submission to the Department.

On March 19, 2003, the Department issued **MAQP #2161-16** to include certain limits and standards associated with the Consent Decree lodged on December 20, 2001. In addition, the permit was updated with new rule references under ARM 17.8, Subchapter 7.

The Department received a request to modify air quality MAQP #2161-16 on July 10, 2003, to change the emission testing schedule for the gasoline truck loading vapor combustion unit to be consistent with MRC's current operating permit. MRC requested to remove all references to a 7,000-barrel per day (bbl/day) limit of crude charge referenced in MRC's Title V Operating Permit. By removing the 7,000 bbl/day reference, MRC is now subject to the conditions in ARM 17.8.324. In a letter received by the Department on September 30, 2003, MRC also requested to add three new asphalt tanks with associated natural gas heaters. Since the emissions from the three tanks were less than 15 TPY, the Department added the tanks under de minimis, ARM 17.8.745. The current permit action updated the permit to reflect the changes. **MAQP #2161-17** replaced MAQP #2161-16.

The above changes were also incorporated into **Operating Permit #OP2161-01**. In addition, in a letter dated May 3, 2004, MRC named Dana Leach as an alternate responsible official. Lastly, the permitting action also changed the dates when MRC shall submit to the Department the compliance monitoring reports required by Section V.D and the compliance certification report required by Section V.B.

On May 14, 2004, the Department received a letter from MRC requesting changes to MAQP #2161-17. The proposed change includes adding the ability to burn sweet gas in heaters at the HF Alkylation Unit, and at Tanks 102, 135, 137, 138, and 139. The sweet gas will have a H_2S limit equivalent to the 40 CFR Part 60, Standards of Performance for NSPS, Subpart J limit of 0.10 grains per dry standard cubic foot (gr/dscf) H_2S. The continuous refinery fuel gas monitoring system for H_2S installed on the fuel gas system that supplies the heaters would be used to determine compliance with the limit. Since the emissions from switching the fuel to sweet gas are less than 15 TPY, the Department added the fuel switch under de minimis, ARM 17.8.745. The current permit action updates the permit to reflect the changes. **MAQP #2161-18** replaced MAQP #2161-17.

On October 20, 2005, the Department received a de minimis notification and Title V permit modification request from MRC for a new floating roof wastewater surge tank, which is subject to 40 CFR 60, Subparts Kb and QQQ.

On May 17, 2007, the Department received an application from MRC for the installation of a railcar product loading rack controlled by a John Zink VCU for gasoline and naphtha. The gasoline railcar loading rack is subject to 40 CFR 63, Subpart CC. Because MRC has found that naphtha may have a vapor pressure above the regulatory threshold of 27.6 kilopascals, MRC has decided to include it as regulated product. In addition to permitting this new process, the permit was updated to improve the organization; new applicable regulations were added, including 40 CFR 63, Subpart UUU, Subpart EEEE, and Subpart DDDDD; obsolete equipment and references were removed, including the five diesel generators which were permitted in 2001 and never installed, and the old SWS unit and its monitoring requirements; Consent Decree #CIV-01-1422LH, entered March 5, 2002 (Consent Decree) requirements were integrated, including the new requirements to comply with 40 CFR 60, Subpart J limits for refinery fuel gas and SWSOH; and refinery fuel gas (RFG) and SWSOH sampling was eliminated, and revised to reflect the operation of a continuous H_2S fuel gas meter and requirement to comply with 40 CFR 60, Subpart J. **MAQP #2161-19** replaced MAQP #2161-18.

On June 5, 2006, the Department received an application for the renewal of Title V Operating Permit #2161-01. The application was deemed administratively complete on July 5, 2006, and technically complete on August 4, 2006. This permit incorporates all applicable source changes since the issuance of Operating Permit #OP2161-01, including:

- Addition of new emitting unit: EU15 – Gasoline Railcar Loading Rack and VCU;

- Incorporation of Consent Decree #CIV-01-1422LH, entered March 5, 2002 requirements. This included updating the Title V Operating Permit with a number of specific new emission limits and monitoring requirements which had been included in the most recent MAQP #2161-19, as well as adding a general requirement for MRC to comply with the relevant applicable terms and conditions of the Consent Decree (excluding the stipulated penalty components); and

- Inclusion of new regulations impacting MRC, including three MACT standards: 40 CFR 63, Subpart UUU, Subpart ZZZZ, and Subpart DDDDD.

Operating Permit **#OP2161-02** replaced Operating Permit #OP2161-01.

On October 15, 2007, the Department received a letter from MRC requesting a correction to MAQP #2161-19, to remove the restrictions on the type of fuel used in specific asphalt tank heaters, which was added erroneously during the previous permitting action. In addition, the MAQP was updated to reflect the fact that requirements under 40 CFR 63, Subpart DDDDD are now "state-only" since the federal rule was vacated in Federal Court on July 30, 2007. **MAQP #2161-20** replaced MAQP #2161-19.

On June 9, 2008, the Department received a letter from MRC requesting an amendment to MAQP #2161-20, to modify the restrictions on Storage Tank #8. This request was a follow-up to a de minimis request received by the Department on April 21, 2008, where MRC proposed to change the operation of Storage Tank #8 from sodium hydrosulfide to naphtha. The Department reviewed this de minimis request and determined that MAQP #2161-20 must first be amended as described in the ARM 17.8.745(2) and ARM 17.8.764 before this change would be allowed. Although the potential emissions increase for this project is less than 15 tons per year, the proposal would have violated a condition of MRC's current permit.

On July 2, 2008, the Department received another letter from MRC requesting an administrative amendment to MAQP #2161-20 to include certain conditions specified in the Administrative Order on Consent (AOC) that MRC entered into with the Department on May 13, 2008. The AOC requires MRC to install and operate a SO_2 and Oxygen (O_2) continuous emission monitor system (CEMS) on the stack for the #1 and #2 Boilers. This SO_2/O_2 CEMS is to be used as the primary analytical instrument to determine compliance with state and federal SO_2 requirements. The AOC requires MRC to request that these conditions be included in the MAQP as enforceable permit conditions.

In addition, MRC requested that the permit be amended to allow certain de minimis changes related to the Diesel/Gas Oil HDS heater and three PMA tank heaters. Specifically, MRC requested that refinery fuel gas, in addition to natural gas, be allowed to be burned in these heaters. The current permit requires that the Diesel/Gas Oil HDS heater and the three PMA tank heaters be fired only with natural gas. This requirement is based on BACT. For the Diesel/Gas Oil HDS heater, the BACT analysis requires that low sulfur fuel be used. Since the refinery fuel gas is also a low sulfur fuel meeting 40 CFR 60, Subpart J requirements of 160 ppm H_2S, the Department determined that the proposed change does not violate any applicable rule and therefore, can be allowed through an administrative amendment as specified in ARM 17.8.745(2) and ARM 17.8.764. For the three PMA tank heaters, however, the BACT analysis specifically requires that these heaters be fired with natural gas for control of NO_x emissions. Therefore, the Department determined that the proposed three PMA tank heaters de minimis changes are prohibited under ARM 17.8.745(1)(a)(i) since an applicable rule, specifically ARM 17.8.752 requiring that BACT be utilized, would be violated. Because BACT determinations cannot be changed under the amendment

process, the Department requested that MRC submit an application for a permit modification that would include a revised BACT analysis in order to make the proposed change for the three PMA tank heaters. **MAQP #2161-21** replaced MAQP #2161-20.

On December 19, 2008, the Department received a request from MRC to amend MAQP #2161-21. MRC requested to change the wording for material stored in specified storage tanks to language representative of the requirements of 40 CFR 60, Subpart Kb in order to provide operational flexibility. Instead of referring to specific products (e.g., naptha, gasoline, diesel, tall oil, etc.), the products would instead be referred to as light oils, medium oils, and heavy oils.

Under MRC's proposed language, light oils would be defined as a volatile organic liquid with a maximum true vapor pressure greater than or equal to 27.6 kilopascal (kPa), but less than 76.6 kPa and would include, but not be limited to, gasoline and naptha. Medium oils would be defined as volatile organic liquids with a vapor pressure less than 27.6 kPa and greater than or equal to 5.2 kPa and would include, but not be limited to, ethanol. Heavy oils would be defined as volatile organic liquid with a maximum true vapor pressure less than 5.2 kPa and would include, but not be limited to diesel, kerosene, jet fuel, slurry oil, and asphalt.

In addition to making the requested change, the Department clarified the permit language for the bulk loading rack VCU regarding the products that may be loaded in the event the VCU is inoperable and deleted all references to 40 CFR 63, Subpart DDDDD: NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters, as it was removed from the ARM in October 2008. The Department has also updated Attachment 1, Ambient Monitoring to reflect the most current permit language and requirements for ambient monitoring. **MAQP #2161-22** replaced MAQP #2161-21.

On December 19, 2008, the Department received an application for a significant modification to Title V Operating Permit #2161-02. This permit incorporates all applicable source changes since the issuance of Operating Permit #OP2161-02, including:

- A change in the type of material allowed to be stored in Storage Tank #8;
- A wording change for the type of material to be stored in specified storage tanks that is representative of the requirements of 40 CFR 60, Subpart Kb in order to provide operational flexibility;
- Incorporation of SO_2/O_2 CEMS requirements on boilers #1 and #2;
- A change to the type of fuel that may be fired in the HTU unit;
- Clarification of permit language for the bulk loading rack VCU regarding products that may be loaded in the event the VCU is inoperable;
- Removal of 40 CFR 63, Subpart DDDDD "state-only" requirements, as this MACT was removed from the ARM in October 2008; and
- Revisions to Appendix E, Ambient Air Monitoring Plan to reflect the most current permit language and requirements for ambient monitoring.

Operating Permit #OP2161-03 replaced Operating Permit #OP2161-02.

D. Current Permit Action

On July 9, 2009, the Department received a request from MRC to modify MAQP #2161-22. MRC submitted a permit modification to allow the use of treated refinery fuel gas or natural gas in the tank heaters. This modification applies to three modified asphalt tanks (Tank #130, 132 and 133) and the associated PMA tank heaters. **MAQP #2161-23** replaced MAQP #2161-22. This action also required a significant modification to Operating Permit #OP2161-03. **OP #2161-04** replaces OP #2161-03.

E. Taking and Damaging Analysis

HB 311, the Montana Private Property Assessment Act, requires analysis of every proposed state agency administrative rule, policy, permit condition or permit denial, pertaining to an environmental matter, to determine whether the state action constitutes a taking or damaging of private real property that requires compensation under the Montana or U.S. Constitution. As part of issuing an operating permit, the Department is required to complete a Taking and Damaging Checklist. As required by 2-10-101 through 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

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

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

F. Compliance Designation

The last full compliance evaluation inspection was conducted on September 22, 2008, covering the time period from September 15, 2006, to September 30, 2008. At that time, it was determined the MRC was generally complying with the terms and conditions of their air quality permits, applicable rules, and consent decrees. Over the past year, the Department has sent two violations letters (June 11, 2009 and December 9, 2009) as issued to MRC and summarized below. MRC continues to cooperate with the Department on resolving these issues of noncompliance. These compliance issues were as follows:

- On January 15, 2008, MRC sent the Department a de minimis request to construct a second hydrogen plant for the existing hydrodesulphurization process and to replace four existing fuel storage tanks with four new storage tanks. The Department approved the de minimis request on February 1, 2008, and the new hydrogen plant became operational during the first quarter of 2009. On April 8, 2009, MRC ran an initial performance test on the hydrogen plant at approximately 75% of design capacity. Pursuant to paragraph 16 of MRC's Final Consent Decree, MRC was required to complete the initial performance test and submit a permit application to propose a NO_x emission limit (in lb/MMBTU on a 3-hr average) for the new hydrogen plant heater. During a site inspection on November 12, 2009, the unit was not operating and according to MRC had been inoperable for approximately 2 months. The Department sent a violation letter on December 9, 2009. On December 29, 2009 , the Department received a permit application for this unit. The Department is currently reviewing the application.

- MRC has encountered difficulties with the operations of some of the CEMS at the facility. Most of the recent violations have been related to the fact that MRC did not continuously monitor the concentration of SO_2, CO, NO_X and O_2 from the FCCU in accordance with the permit.

- According to the *Consolidated Quarterly Emissions Report – 1st Quarter 2009* submitted by MRC and received by the Department on May 15, 2009, the calculated CO emissions from the #1 and #2 boilers stack exceeded the permit limit of 1.00 lb/hr for 425 hourly periods during the 1st quarter of 2009. Additionally, since adding the SO_2 CEMS to the #1 and #2 Boiler stack, MRC has exceeded the 3-hour SO_2 limit (20 ppmvd, corrected to 0% oxygen) on numerous occasions. On June 11, 2009, the Department sent a violation letter regarding these items of noncompliance.

- According to the *Consolidated Quarterly Emissions Report – 3rd Quarter 2009* submitted by MRC and received by the Department on November 16, 2009, the SO_2 and O_2 CEMS were not operating sufficiently during the reporting period. Additionally, MRC exceeded the 20 ppm SO_2 boiler 3-hour average limit (corrected to 0% O_2) numerous times during the the 3rd quarter of 2009. MRC also reported that for the FCCU, the SO_2, CO, NO_x, and O_2 CEMS were not operating sufficiently during the reporting period. On December 9, 2009 the Department sent a violation letter regarding these items of noncompliance.

- During the review period, there were a few excess emissions events noted during periods of start-up/shutdown, process upsets, malfunction events and specific noncompliance events. These events were investigated by the Department. The Department will continue to review excess emissions and compliance monitoring reports, startup/shutdown conditions, process upsets and malfunction events on a case-by-case basis in the future to determine if an enforcement response is warranted.

SECTION II SUMMARY OF EMISSION UNITS

A. Facility Process Description

MRC refines petroleum hydrocarbons at a small refinery in Great Falls, Montana.

B. Emission Units and Pollution Control Device Identification

The following table includes the significant emitting units contained in the permit. MRC must comply with the applicable requirements for each emitting units listed below.

Emissions Unit ID	Description	Pollution Control Device/Practice
EU01	PLANT WIDE EMISSIONS	None
EU02	**CRUDE UNIT**	
EU02a	Crude Furnace	None
EU02b	Vacuum Heater	None
EU02c	Standard Gas Valves	None
EU02d	Standard Light Valves	None
EU02e	Drains	None
EU03	**CATALYTIC POLY UNIT**	
EU03a	Cat Poly Unit Valves	None
EU04	**FCCU**	
EU04a	FCCU Regenerator	None
EU04b	FCCU Preheater	None
EU04c	Standard Gas Valves	None
EU04d	Standard Light Valves	None
EU04e	Pumps Light	None
EU005	**CATALYTIC REFORMER UNIT**	
EU05a	Reformer Heater	None
EU05b	Naphtha Heater	None
EU05c	Standard Gas Valves	None
EU05d	Standard Light Valves	None
EU05e	Kerosene Heater	None
EU05f	Naptha HDS Unit	None
EU05g	Kerosene HDS Unit	None
EU06	**STORAGE LOADOUT UNIT**	
EU06a	Product Loadout Facilities	None
EU06b	Pumps	None
EU06c	Storage LPG	None
EU06d	Standard Light Valves	None
EU06e	Storage Tank Farm	Floating Roofs
EU06f	Tanks Light	None
EU07	**UTILITY UNIT**	
EU07a	Wastewater Treatment Plant	None
EU07b	Boilers #1& #2	None
EU07c	Standard Gas Valves	None
EU08	**ALKYLATION UNIT**	
EU08a	Deisobutanizer Reboiler	None
EU08b	Standard Light Valves	None
EU08c	Pumps Light	None
EU08d	Oily Water Separator	None
EU09	**HYDROGEN PLANT**	
EU09a	Hydrogen Plant Reformer Furnace Stack (natural gas)	None
EU10	**GASOLINE TRUCK LOADING RACK**	
EU10a	Gasoline Loading Rack	VCU
EU10b	Vapor Combustion Unit (VCU)	None
EU11	**ASPHALT TANKS AND POLYMER-MODIFIED ASPHALT (PMA) UNIT**	None
EU12	**COOLING TOWERS**	None

EU13	**NaHS UNIT**	None
EU14	**DIESEL/GAS HTU UNIT** (natural gas)	None
EU15	**GASOLINE RAILCAR LOADING RACK**	
EU15a	Gasoline Railcar Loading Rack	VCU
EU15b	VCU	

C. Categorically Insignificant Sources/Activities

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

Emissions Unit ID	Description	Associated Unit(s)
IEU01	FCCU Catalyst Heater	Cat Poly Unit
IEU02	Compressor Gas	Cat Poly Unit
IEU03	Reactor Catalyst Heater	Cat Reformer Unit
IEU09	Loadout Facilities JP-4	Storage Loadout Unit
IEU10	Loadout Facilities Kerosene	Storage Loadout Unit
IEU11	Loadout Facilities Diesel	Storage Loadout Unit
IEU12	Loadout Facilities Jet A	Storage Loadout Unit
IEU13	Loadout Facilities Standard Valves Light	Storage Loadout Unit
IEU14	Loadout Facilities Standard Valves Heavy	Storage Loadout Unit
IEU15	Loadout Facilities JP-8	Storage Loadout Unit
IEU16	Loadout Facilities Naphtha	Storage Loadout Unit
IEU17	Loadout Facilities Fuel Oil #5	Storage Loadout Unit
IEU18	Loadout Facilities Crude	Storage Loadout Unit
IEU20	Drains	FCCU, Cat Poly Unit Cat, Reformer Unit, Storage Load-out Unit, Alky Unit, NASH Unit, HTU Unit, Hydrogen Unit
IEU21	Relief Valves	Crude Unit, FCCU, Cat Poly Unit, Cat Reformer Unit, Storage Loadout Unit, Utility Unit, Alky Unit, NASH Unit, HTU Unit, Asphalt Polymerization Unit
IEU22	Open Valves	Crude Unit, FCCU, Cat Poly Unit, Cat Reformer Unit, Storage Loadout Unit, Utility Unit, NASH Unit, Hydrogen Unit
IEU23	Flanges	Crude Unit, FCCU, Cat Poly Unit, Cat Reformer Unit, Storage Loadout Unit, Utility Unit, Alky Unit, NASH Unit, HTU Unit, Hydrogen Unit, Asphalt Polymerization Unit
IEU24	Pumps Light	Crude Unit, FCCU, Cat Reformer Unit, Storage Loadout Unit, HTU Unit
IEU25	Storage Tanks Heavy	Storage Loadout Unit
IEU26	Storage Valves Heavy	Crude Unit, Cat Poly Unit, Reformer Unit, Storage Loadout Unit, HTU Unit, Asphalt Polymerization Unit
IEU27	Pumps Heavy	Crude Unit, Cat Poly Unit, Cat Reformer Unit, Storage Loadout Unit, HTU Unit, Asphalt Polymerization Unit
IEU28	Chemical Additive Pots	Crude Unit, Cat Poly Unit, Cat Reformer Unit, Storage Loadout Unit, Utility Unit, Asphalt Polymerization Unit
IEU29	Fuel Gas Open Valves	Utility Unit
IEU30	Fuel Gas Flanges	Utility Unit
IEU31	Fuels Gas Relief Valves	Utility Unit
IEU32	Flare Pilot Gas	Utility Unit
IEU33	Standard Valves Gas	FCCU, Alky Unit, NASH Unit, HTU Unit Hydrogen Unit
IEU34	Lubricator	Cat Reformer Unit, HTU Unit
IEU35	Standard Valves Light	HTU Unit
IEU36	Standard Valves Hydrogen	FCCU Cat Reformer Unit HTU Unit Hydrogen Unit
IEU37	Compressor Hydrogen	Cat Reformer Unit, HTU Unit
IEU38	Chemical Additive Tanks	Hydrogen Unit

SECTION III PERMIT CONDITIONS

A. Emission Limits and Standards

MRC shall comply with the general applicable requirements as well as some specific requirements.

MRC shall comply with opacity limitations of 20% and 40%, depending on the year of installation for a given piece of equipment. In addition, the loading rack VCUs are limited to 10% opacity and asphalt tanks which are subject to 40 CFR 60, Subpart UU shall comply with a 0% opacity limitation.

MRC is no longer exempt from the sulfur in fuel limitation of 50 gr H_2S /100 cubic feet in ARM 17.8.322(5), because the facility is no longer limited to less than 10,000 barrels of crude per day. However, since the facility became subject to 40 CFR 60, Subpart J fuel gas combustion device requirements, MRC is also required to meet the more stringent refinery fuel gas limit of 0.1 gr H_2S/dscf. In addition, although MRC is subject to the sulfur in fuel rule for liquid or solid material of 1 lb/MMBtu, they are not allowed to burn liquid or solid fuels due to the Consent Decree.

MRC has plant-wide SO_2 limitations that must be complied with both on an annual basis of 1515 TPY and a basis of 4.15 tons per day. MRC also has a plant-wide CO emission limitation of 4700 TPY and 12.9 tons per day. MRC must also comply with specific SO_2, NO_x, and CO emission limitations on the Boilers #1 and #2 stack and the FCCU, as well as a PM limit for the FCCU. The Diesel/Gas HTU heater and the hydrogen plant reformer heater have NO_x and CO emission limitations.

MRC has a gasoline truck loading rack and a gasoline railcar loading rack with specific VOC, CO, and NO_x emission limitations. During permitting of the loading racks, MRC completed risk assessments to demonstrate negligible risk to human health and the environment.

MRC also has several sources listed in the permit that are subject to the NSPS requirements of 40 CFR, Subpart J, Subpart Kb, Subpart GGG, and Subpart QQQ. Several sources are also subject to the MACT requirements of 40 CFR 63, Subpart CC and Subpart UUU, as well as Subpart EEEE. MRC is also subject to 40 CFR 61, Subpart FF, J and V. If at anytime from the Date of Lodging of the Consent Decree MRC is determined to have a total annual benzene (TAB) equal to or greater than 10 Mg/yr, MRC, as applicable, shall comply with the compliance option set forth at 40 CFR 61.342(e).

B. Monitoring Requirements

MRC is required to maintain an ambient air monitoring program for SO_2 in accordance with Operating Permit #OP2161-04.

ARM 17.8.1212(1) requires that all monitoring and analysis procedures or test methods required under applicable requirements be contained in operating permits. In addition, when the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor for all emission units. Furthermore, it does not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for a insignificant emissions unit is not threatened by lack of regular monitoring and when periodic testing or monitoring is not otherwise required by the applicable requirement, the status quo **(i.e., no monitoring)** will meet the requirements of ARM 17.8.1212(1). Therefore, the permit does not include monitoring for insignificant emission units.

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

C. Test Methods and Procedures

The operating permit may not require testing for all sources if routine monitoring is used to determine compliance, but the Department has the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, MRC may elect to voluntarily conduct compliance testing to confirm its compliance status.

Operating Permit #OP2161-04 requires testing for some specific units. The FCCU is required to be tested for PM, CO and SO_2; in addition, the RATA required for each pollutant requires that MRC conduct an annual stack test for NO_x on the FCCU. The boilers #1 and #2 stack are required to test to demonstrate compliance with NO_x and CO emission limitations; in addition, an SO_2 CEMS is required for this unit. The standard Reference Method test shall be complied with as well as additional testing requirements for the boiler stacks #1 and #2. Lastly, MRC is required to test the gasoline truck loading and railcar loading rack VCUs for total organic compounds on an every 5-year basis.

Also, an annual testing, daily calibration checks (with three points) and quarterly certified gas analysis are required for the H_2S gas monitor. All tests shall be done in accordance with the Montana Source Test Protocol and Procedures Manual or another method approved by the Department.

D. Recordkeeping Requirements

MRC is required to keep all records listed in the operating permit as a permanent business record for at least 5 years following the date of the generation of the record. The records are required to be maintain under MRC's control and available to Department upon request within a reasonable amount of time.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, MRC is required to submit quarterly, semiannual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation. The quarterly emission reports shall be a consolidated emissions report and QA/QC results in one document to the Department. The report shall be in hard and electronic form with the electronic format in ASCII and with a template of each set of data. The quarterly emission report shall be submitted to the Department with the compliance monitoring report on or before January 31 and July 31 and additionally on or before April 30 and October 31.

To eliminate redundant reporting, a source may reference previously submitted reports (with at least the date and subject of the report) in the semiannual and annual reports instead of resubmitting the information in monthly, quarterly, and/or other reports. However, a source must still certify continuous or intermittent compliance with each applicable requirement annually.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Great Falls Tribune* newspaper on or before December 10, 2009. The Department provided a 30-day public comment period on the draft operating permit from December 10, 2009, to January 11, 2010. ARM 17.8.1232 requires the Department to keep a record of both comments and issues raised during the public participation process.

Summary of Public Comments

Person/Group Commenting	Comment	Department Response
	No public comments were received.	

G. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
	No comments were received.	

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
	No comments were received.	

SECTION IV NON-APPLICABLE REQUIREMENT ANALYSIS

Section IV of the operating permit Non-Applicable Requirements contains the requirements that the Department determined were non-applicable. The following table summarizes the requirements that MRC identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

Applicable Requirement	Reason
Federal Requirements	
40 CFR 72 Permit Regulation (Acid Rain Permit) 40 CFR 73 Sulfur Dioxide Allowance System 40 CFR 74 Sulfur Dioxide OPT-Ins 40 CFR 75 CEM (Acid Rain Emission Monitoring) 40 CFR 76 Acid Rain Nitrogen Oxides Emission Reduction Program 40 CFR 77 Excess Emissions (Acid Rain) 40 CFR 78 Appeal Procedures for Acid Rain Program	These regulations do apply to this facility.
40 CFR 82 Protection of Stratospheric Ozone (except Subpart F)	These rules contain requirements for processes, equipment, or activity that is not used at the facility.
FCAA Title I Part D Plan Requirements for Non-Attainment Areas FCAA Section 111(d)	These rules have specific requirements that may become relevant to a major source during the permit span.

SECTION V FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

MRC is currently subject to 40 CFR 63, Subparts CC, UUU, and EEEE. This facility would also be subject to 40 CFR 63, Subpart DDDDD –NESHAP for Industrial, Commercial, and Institutional Boilers and Process Heaters (also referred to as the Boiler MACT). However, on July 30, 2007, the Court of Appeals for the District of Columbia Circuit issued its mandate in NRDC v. EPA, vacating and remanding EPA's Boiler MACT. This rule was subsequently removed from the ARM in October 2008 and, as such, does not apply to this facility at this time.

The Department is not aware of any proposed or pending MACT standards, in addition to those already listed, that may be applicable. MRC could become subject to 40 CFR, Subpart GGGGG—National Emission Standards for Hazardous Air Pollutants: Site Remediation in the future.

B. NESHAP Standards

The Department is not aware of any proposed or pending NESHAP standards, in addition to those already listed, that may be applicable.

C. NSPS Standards

The Department is not aware of any proposed or pending NSPS standards, in addition to those already listed, that may be applicable at this time. However, MRC may be subject to applicable requirements in 40 CFR 60, Subpart Ja and the modifications to 40 CFR 60, Subpart J that were finalized in 2008. In addition, MRC will be subject to any applicable changes to 40 CFR 60, Subpart VV.

D. Risk Management Plan

MRC has more than a threshold quantity of a regulated substance in a process, and was required to comply with 40 CFR 68 requirements no later than June 21, 1999; 3 years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later. MRC has met the requirements of 40 CFR 68 for the Risk Management Plans. EPA received MRC's Risk Management Plan on August 20, 1999.

E. Compliance Assurance Monitoring (CAM) Plan

An emitting unit located at a Title V facility that meets the following criteria listed in ARM 17.8.1503 is subject to Subchapter 15 and must develop a CAM Plan for that unit:

- The emitting unit is subject to an emission limitation or standard for the applicable regulated air pollutant (other than emission limits or standards proposed after November 15, 1990, since these regulations contain specific monitoring requirements);
- The emitting unit uses a control device to achieve compliance with such limit; and
- The emitting unit has potential pre-control device emission of the applicable regulated air pollutant that are greater than major source thresholds/

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