MONTANA DEPARTMENT OF ENVIRONMENTAL QUALITY
OPERATING PERMIT TECHNICAL REVIEW DOCUMENT

Permitting and Compliance Division
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NorthWestern Energy
Cobb Storage Field Station 017-1 through 6
NW¼ of the NE¼ of Section 15, Township 35 North, Range 5 West, Glacier County, Montana
40 East Broadway
Butte, MT 59701

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		annual or semiannual @ 1440 hrs
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
Schedule of Compliance Required		X	
Annual Compliance Certification and Semiannual Reporting Required	X		As Applicable
Monthly Reporting Required		X	
Quarterly Reporting Required		X	
Applicable Air Quality Programs			
ARM Subchapter 7 Montana Air Quality Permit (MAQP)	X		MAQP #2783-08
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAPS)	X		40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	40 CFR 63, Subpart HH and Subpart ZZZZ
Major New Source Review (NSR) – includes Prevention of Significant Deterioration (PSD) and/or Non-attainment Area (NAA) NSR		X	
Risk Management Plan Required (RMP)		X	
Acid Rain Title IV		X	
Compliance Assurance Monitoring (CAM)		X	
State Implementation Plan (SIP)	X		General SIP

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SECTION I. GENERAL INFORMATION

A. Purpose

This document establishes the basis for the decisions made regarding the applicable requirements, monitoring plan, and compliance status of emissions units affected by the operating permit proposed for this facility. The document is intended for reference during review of the proposed permit by the Environmental Protection Agency (EPA) and the public. It is also intended to provide background information not included in the operating permit and to document issues that may become important during modifications or renewals of the permit. Conclusions in this document are based on information provided in the original application submitted by NorthWestern Energy (NWE), as Montana Power Company (MPC), on June 7, 1996. NWE, as NorthWestern Corporation, the Title V permit renewal application received on July 18, 2002, the administrative amendment request received June 12, 2003, the Title V permit renewal application received January 25, 2008, the administrative amendment request received February 7, 2008, the administrative amendment request received October 27, 2009, and the administrative amendment request received September 7, 2011.

B. Facility Location

NWE owns and operates the Cobb Storage Field Station. This facility is located in the Northwest ¼ of the Northeast ¼ of Section 15, Township 35 North, Range 5 West in Glacier County, Montana. Glacier County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Cobb Storage Field Station has a total property area of 10 acres. This facility is located approximately 68 miles east of Glacier National Park, a PSD Class I Area.

C. Facility Background Information

Montana Air Quality Permit (MAQP) Background

On July 21, 1993, the Department of Environmental Quality (Department) issued **MAQP #2783-00** to MPC for the operation of their compressor station and associated equipment located in the Northwest ¼ of the Northwest ¼ of Section 15, Township 35 North, Range 5 West in Glacier County, near Cut Bank, Montana. The station was identified as the Cobb Storage Field, Station 017-1 through 6.

On February 9, 1994, the Department issued MAQP #2783-01 to MPC. This modification revised the emission limitations from a gram per brake horsepower-hour (g/Bhp-hr) limit to a pound per hour (lb/hr) limit. In addition, to clarify nitrogen oxides (NO_x) mass emission calculations, NO_x emission limitations were identified as nitrogen dioxide (NO_2). Furthermore, a 90-day testing extension was granted to MPC. **MAQP #2783-01** replaced MAQP #2783-00.

On September 16, 1994, the Department issued MAQP #2783-02 to MPC. This permit action increased the capacity on two of the Solar Saturn turbines (units #3 and #4) from 1,100 brake horsepower (bhp) to 1,400 bhp and added a third 1,400 bhp Solar Saturn turbine (unit #6). In addition, the 1,100 bhp White Superior carbon monoxide (CO) mass emission rates were increased to 7.28 lb/hr. The increase was necessary because the previous CO limits were based on manufacturer data under specific, ideal conditions that are not consistently present at the Cobb Storage Field Station. The Cobb Storage Field Station operations were also limited to 6,132 hours per year (hr/yr) in order to limit the facility's potential emissions below the Prevention of Significant Deterioration (PSD) thresholds. Also, the Rite Leating 0.76-million British thermal units per hour (MMBtu/hr) boiler was replaced with a Teledyne-Laars 0.85-MMBtu/hr boiler. **MAQP #2783-02** replaced MAQP #2783-01.

On July 24, 1997, the Department issued MAQP #2783-03 to MPC. This permit action included 40 CFR 60, Subpart GG as a condition of the permit because it was determined to be applicable to the facility. The modification contained exemptions from the monitoring requirements of 40 CFR 60, Subpart GG based on the requirement of MPC to compress and combust only pipeline quality natural gas at the Cobb Storage Field Station. The modification also updated the rule references in the permit. **MAQP #2783-03** replaced MAQP #2783-02.

On August 28, 1997, the Department issued MAQP #2783-04 to MPC. MPC requested that the permit be modified to correctly identify the two 240 bhp Ingersoll Rand engines as 300 bhp Ingersoll Rand engines. The original application and permit had identified the engines as 240 bhp engines. MPC discovered the mistake and requested that the permit be modified to reflect the correct engine size. **MAQP #2783-04** replaced MAQP #2783-03.

On July 23, 2000, the Department issued MAQP #2783-05 to MPC. MPC had requested an alteration to MAQP #2783-04 that included the installation of two new 1,400 bhp Solar Saturn turbine compressors. MPC requested a limitation on all of the compressors at the site to stay below the threshold that would require a PSD permit. Separate limitations were assigned to each of the three different types of compressors. Also, the Department reviewed the applicability of 40 CFR 60, Subpart GG and determined that Subpart GG is not applicable to this facility. As a result of the determination, the limitation of 150 part per million (ppm) on the 1,400 bhp compressors and the monitoring requirements were removed from the permit. **MAQP #2783-05** replaced MAQP #2783-04.

On November 23, 2002, the Department issued MAQP #2783-06 to NorthWestern Corporation (NorthWestern). On July 18, 2002, the Department received a modification request from Bison Engineering, Inc. (Bison), on behalf of NorthWestern for MAQP #2783-05. The permit analysis was updated to be consistent with the equipment, equipment size, and equipment descriptions for the operating permit. In addition, the two Solar Saturn turbines that were permitted in July 2000 were correctly identified as 1,450 bhp. Permit Application #2783-05 and MAQP #2783-05 incorrectly identified the two Solar Saturn turbines as 1,400 bhp. In addition, on October 18, 2002, the Department received a letter dated October 15, 2002, from NorthWestern informing the Department that a name change from MPC to NorthWestern was completed. The permit was modified to reflect the name change. **MAQP #2783-06** replaced MAQP #2783-05.

On October 30, 2003, the Department received an administrative amendment request from NorthWestern for MAQP #2783-06. NorthWestern requested that the every 4-year testing requirements for each of the two 1,450 bhp Solar Saturn turbines and each of the three 1,400 bhp Solar Saturn turbines be removed from the permit because NorthWestern's Title V Operating Permit #OP2783-02, as issued as final on September 16, 2003, requires at least annual testing on each of the five turbines.

The permit action removed the every 4-year testing requirements for each of the five turbines from the permit. In addition, the permit format, language, and rule references were updated to reflect the Department's current permit format, language, and rule references. **MAQP #2783-07** replaced MAQP #2783-06.

On February 7, 2008, the Department received a request from NWE to change the name on MAQP #2783-07 from NorthWestern to NWE. The permit action incorporated the requested name change as well as updated the permit format and language to reflect the Department's current permit format and language. **MAQP #2783-08** replaced MAQP #2783-07.

Title V Operating Permit Background

On June 7, 1996, the Department received an operating permit application for the Cobb Storage Field Facility. The permit application was deemed administratively complete on July 7, 1996, and the application was deemed technically complete on August 7, 1996. **Operating Permit #OP2783-00** became final and effective on January 23, 1998.

On July 18, 2002, the Department received a Title V Operating Permit Renewal Application from Bison, on behalf of NorthWestern. The application was deemed administratively complete on July 18, 2002, and technically complete on September 4, 2002.

After review of the application for permit renewal and in accordance with current Department protocol for Title V operating permit requirements, the Department determined that several emitting units included in Operating Permit #OP2783-00 as significant emitting units are insignificant emitting units subject to only generally applicable requirements, as currently defined under the Title V operating permit program. Therefore, the following significant emitting units, as cited in Operating Permit #OP2783-00, have been placed on the insignificant emitting unit list for Operating Permit #OP2783-01.

- EU007 (Operating Permit #OP2783-00) – 0.5 MMBtu/hr BS &B Reboiler;
- EU008 (Operating Permit #OP2783-00) – 0.6 MMBtu/hr Enertek Dehy 3486 Reboiler;
- EU009 (Operating Permit #OP2783-00) – 0.85 MMBtu/hr Teledyne-Laars Boiler;
- EU010 (Operating Permit #OP2783-00) – < 1 MMBtu/hr Building Heaters;
- EU011 (Operating Permit #OP2783-00) – Fugitive Emissions from process valves, etc.;
- EU013 (Operating Permit #OP2783-00) – In-plant Vehicle Traffic;
- EU014 (Operating Permit #OP2783-00) – Emergency Backup Generator; and
- EU015 (Operating Permit #OP2783-00) – Methanol Storage Tank

In addition, two 1,450 bhp Solar Saturn compressor turbines (EU07 and EU08) that were included in NorthWestern's MAQP in July 2000, but were not incorporated into NorthWestern's Title V Operating Permit, were added to Operating Permit #OP2783-01. Further, a 500-gallon and a 1000-gallon dehydrator condenser tanks (EU09 – Dehydrator Tanks) that were not previously identified in NorthWestern's Title V Operating Permit were added to Operating Permit #OP2783-01. Minor editorial and equipment description corrections were also completed.

As part of the renewal application, NorthWestern also requested that portable analyzer testing included in Operating Permit #OP2783-00 be decreased in frequency to annual testing. The Department determined that annual portable analyzer testing on compressor stations (as opposed to semiannual) would not be accepted by EPA. Therefore, the portable analyzer testing frequency remains the same. Title V **Operating Permit #OP2783-01** became final and effective on July 31, 2003, and replaced Title V Operating Permit #OP2783-00.

On June 12, 2003, the Department received a letter from NorthWestern. NorthWestern notified the Department of a change in the responsible official for all of NorthWestern's Facilities. The current permit action updates the permit to reflect the change in the responsible official. In addition, the general conditions of the permit (Section V of the permit) were updated. **Operating Permit #OP2783-02** replaced Operating Permit #OP2783-01.

On January 25, 2008, the Department received a Title V Operating Permit Renewal Application from Bison, on behalf of NorthWestern. The application was deemed administratively complete on February 25, 2008, and technically complete on March 25, 2008.

In addition, on February 7, 2008, the Department received a request from NorthWestern to change the name on Operating Permit #OP2783-02 from NorthWestern to NWE. The permit action incorporated the requested name change. **Operating Permit #OP2783-03** replaced Operating Permit #OP2783-02.

On October 27, 2009, the Department received a request from NWE for an administrative amendment to Operating Permit #OP2783-03. The administrative amendment action changed the facility contact from Rick Walsh to Ross Whelchel. The application was deemed administratively complete on October 27, 2009, and technically complete on October 27, 2009. The permit action updated the permit to reflect the change in the facility contact. **Operating Permit #OP2783-04** replaced Operating Permit #OP2783-03.

D. Current Permit Action

On September 7, 2011 the Department received an administrative amendment request to change the name of the responsible official from Dave Gates to Michael R. Cashell. The current permit action is an administrative amendment to change the name of the responsible official. In accordance with ARM 17.8.1228 (1)(a), the Department also updated permit conditions for the engine units based on 40 CFR 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines which was revised in 2010 with applicable requirements for existing engines at area sources of hazardous air pollutants (HAP). **Operating Permit #OP2783-05** replaces Operating Permit #OP2783-04.

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 pubic 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?

YES	NO	
	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 NWE Cobb Storage Field Station was last inspected on February 9, 2010 nd a compliance monitoring report that includes a full compliance evaluation (FCE), for the period of March 26, 2009 to May 10, 2010 was completed on March 10, 2010. In addition to the on-site inspection, the Department conducted a review of reports/records submitted by NWE during the period covered by this FCE. Based on the conditions observed during the inspection and file review, NWE appeared to be in compliance with the conditions and limitations of MAQP #2783-08 and Operating Permit #OP2783-04.

SECTION II. SUMMARY OF EMISSIONS UNITS

A. Facility Process Description

The complex has two primary purposes. The first is to pump the field gas up to the required pressure in the natural gas transmission system. Compression of the gas is accomplished using the compressor engines and the turbines described in Section II.B of this technical review document. Three engine heaters provide heat to the various station facilities.

The second purpose of the complex is to "dry" the gas as it is being processed. The gas contains some moisture, which must be removed from the system prior to being sent into the transmission system. This is accomplished with a dehydrator, also commonly called a reboiler or glycol unit.

Pipeline quality natural gas is injected into the Cobb Storage Field Station during low use periods, primarily the summer. The gas is retrieved from storage during high use periods, primarily the winter. During storage, the gas takes in some moisture and other material from the geologic formation. When the gas is retrieved, moisture and impurities are removed and the gas is brought up to pipeline pressure before being pumped into the main line for market.

In preparation for storage, natural gas is piped from NWE's Main Line #1 Station to the Cobb Storage Field Station where it is sent through a "scrubber." In the scrubber, water and other liquid constituents (e.g. heavy ends, butane, C5+) drop out of the gas stream. The scrubbed gas is then injected into the formation for storage.

When consumer demand is great enough, natural gas is retrieved from storage. From the formation, the gas is routed through a scrubber to remove water and other liquid constituents that have been taken up during storage. The gas is then compressed to a pressure ranging from 550 to 650 pounds per square inch (psi) using natural gas fired engine or turbine driven compressors. The Cobb Storage Field Station uses both reciprocating internal combustion engines (RICE) and combustion turbines (CT) for compression activities.

After the gas has been compressed, it is dehydrated by a triethylene glycol (TEG) dehydrator. In the dehydrator, wet gas flows through two contactor towers where it bubbles through a "lean" TEG solution that absorbs moisture. The wet, or "rich", TEG flows from the towers to either a 0.5-MMBtu/hr reboiler or a 0.6-MMBtu/hr reboiler. Typically, the 0.5-MMBtu/hr reboiler is used as a backup to the 0.6-MMBtu/hr reboiler. Whichever reboiler is in use, the TEG is heated to approximately 300 to 350 degrees Fahrenheit (°F), driving off the water and making the glycol "lean" again.

Each reboiler is associated with a condenser/storage tank that receives vapors from the reboiler, or still vent. As these vapors leave the reboiler, they condense in the piping and tank and produce a mixture of water and natural gas liquids. This process mitigates potential atmospheric emissions.

B. Emissions Units and Pollution Control Device Identification

The emissions units regulated by Operating Permit #OP2783-05 and the pollution control device utilized by each emission units are summarized in the following table:

Emissions Unit I.D.	Description	Year Installed	Pollution Control Device
EU001	300 bhp Ingersoll Rand Engine	1948	None
EU002	300 bhp Ingersoll Rand Engine	1948	None
EU003	1,400 bhp Solar Saturn Turbine	1965	None
EU004	1,400 bhp Solar Saturn Turbine	1969	None
EU005	1,100 bhp White Superior Engine	1979	None
EU006	1,400 bhp Solar Saturn Turbine	1994	None
EU007	1,450 bhp Solar Saturn Turbine	2000	None
EU008	1,450 bhp Solar Saturn Turbine	2000	None
EU009	1,000/500-gallon Dehydrator Tanks (2)	----------	None
EU010	Dehydrator Still Vent	----------	None

C. Categorically Insignificant Sources/Activities

As defined in ARM 17.8.1201, "insignificant emissions unit" means (i) any activity or emissions unit located within a source that has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to Section 112(b) of the FCAA; and (iv) is not regulated by any applicable requirement, other than a generally applicable requirement that applies to all emission units subject to this subchapter. The following units constitute insignificant emitting units (IEU).

Insignificant Emissions Unit I.D.	Description
IEU001	0.5 MMBtu/hr BS & B Reboiler
IEU002	0.85 MMBtu/hr Teledyne-Laars Boiler
IEU003	0.6 MMBtu/hr Enertek Dehy 3486 Reboiler
IEU004	< 1 MMBtu/hr Building Heaters
IEU005	Fugitive Emissions from Process Valves, Etc.
IEU006	In-plant Vehicle Traffic
IEU007	158 bhp Onan Cummins Emergency Generator
IEU008	1,000-gallon Methanol Storage Tank

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

Each of the five Solar Saturn turbines (three 1,400 bhp and two 1,450 bhp) is limited to 9.26 lb/hr for both NO_x and CO, and 0.86 lb/hr for volatile organic compound (VOC). The emission limits are based on Best Available Control Technology (BACT) determinations that were established by the Department. The combined total hours of operation of the five Solar Saturn turbines are limited to 24,000 hours during any rolling 12-month time period. The hours of operation limit was placed on the Solar Saturn turbines, as requested by NWE, to keep the facility's potential emissions below the New Source Review (NSR) permitting threshold.

In addition, the 1,100 bhp White Superior compressor engine is limited to 36.46 lb/hr for NO_x, 7.28 lb/hr for CO, and 1.21 lb/hr for VOC. These emission limits are also based on BACT determinations that were established by the Department. The total hours of operation of the 1,100 bhp White Superior compressor engine are limited to 4,800 hours during any rolling 12-month time period. The hours of operation limit was placed on the White Superior compressor engine, as requested by NWE, to keep the facility's potential emissions below the NSR permitting threshold.

Further, the two 300 bhp Ingersoll Rand compressor engines do not have associated emission limits. However, the combined total hours of operation of the two Ingersoll-Rand compressor engines are limited to 9,600 hours during any rolling 12-month time period. The hours of operation limit was placed on the Ingersoll-Rand engines, as requested by NWE, to keep the facility's potential emissions below the NSR permitting threshold.

B. Monitoring Requirements

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

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

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

C. Test Methods and Procedures

MAQP #2783-06 requires NWE to test each of the five Solar Saturn turbines (three 1,400 bhp and two 1,450 bhp) for NO_x and CO, concurrently, to demonstrate compliance with the emission limitations in the permit. The permit demands that the tests be performed according to the EPA

methods in Appendix A of 40 CFR Part 60. Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit can be demonstrated by burning pipeline quality natural gas on a continuous basis.

This operating permit contains requirements for semiannual testing with a portable analyzer for each of the five Solar Saturn turbines (three 1,400 bhp and two 1,450 bhp) and the 1,100 bhp White Superior compressor engine. The permit stipulates that the portable analyzer shall be capable of achieving performance specifications equivalent to the traditional test methods in 40 CFR 60, Appendix A or shall be capable of meeting the requirements of EPA Conditional Test Method 030 for the "Determination of Nitrogen Oxides, Carbon Monoxide, and Oxygen Emissions from Natural Gas-Fired Engines, Boilers and Process Heaters Using Portable Analyzers." NWE may use another testing procedure as approved in advance by the Department. All compliance tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). NWE will then convert the NO_x and CO emissions test results from a "ppm" value to a "lb/hr" number. Stack gas flow rates shall be determined using EPA Test Methods in 40 CFR 60, Appendix A in order to monitor compliance with the emissions limitations in the permit.

The Department will use the portable analyzer testing results as a direct measure of compliance. The operating permit may not require testing for all sources if routine monitoring is used to monitor compliance, but the Department has the authority to require testing if deemed necessary to monitor compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct compliance testing to monitor compliance status.

This operating permit contains requirements for performing Method 9 tests as required by the Department. Method 9 tests must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). Each observation period must be a minimum of 6 minutes unless any one reading is 20% or greater, then the observation period must be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time.

D. Recordkeeping Requirements

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least five years following the date of the generation of the record.

E. Reporting Requirements

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit semi-annual and annual monitoring reports to the Department and to annually certify compliance with the applicable requirements contained in the permit. The reports must include a list of all emission limit and monitoring deviations, the reason for any deviation, and the corrective action taken as a result of any deviation.

SECTION IV. NON-APPLICABLE REQUIREMENTS ANALYSIS

NWE requested a permit shield from all requirements that were identified as non-applicable in its renewal permit application. 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 NWE 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
Subchapter 3 Emission Standards		
ARM 17.8.301 ARM 17.8.302	Definitions Incorporation by Reference	These rules consist of a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.326	Prohibited Materials for Wood or Coal Residential Stoves	These regulations may not be applicable to the source at this time; however, they may become applicable during the life of the permit.
ARM 17.8.330	Definitions	This rule consists of a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
Subchapter 5 Air Quality Permit Application, Operation and Open Burning Fees		
ARM 17.8.501	Definitions	This rule consists of a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.510	Annual Review	This rule does not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, this rule can be used as authority to impose specific requirements on a major source.
ARM 17.8.511 ARM 17.8.514 ARM 17.8.515	Air Quality Permit Application/Operation Fee Assessment Appeal Procedures Air Quality Open Burning Fees Air Quality Open Burning Fees for Conditional, Emergency, Christmas Tree Waste, and Commercial Film Production Open Burning Permits	These are procedural rules that have specific requirements that may become relevant to a major source during the permit span.

Applicable Requirement		Reason
Subchapter 6 Open Burning		
ARM 17.8.601 ARM 17.8.602	Definitions Incorporation by Reference	These rules consist of a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.611 ARM 17.8.612 ARM 17.8.613 ARM 17.8.614 ARM 17.8.615	Emergency Open Burning Permits Conditional Air Quality Open Burning Permits Christmas Tree Waste Open Burning Permits Commercial Film Production Open Burning Permits Firefighter Training	The following regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit.
Subchapter 8 Prevention of Significant Deterioration		
ARM 17.8.801 ARM 17.8.802	Definitions Incorporation by Reference	These rules consist of a statement of purpose, applicability statement, regulatory definition or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.804 ARM 17.8.805 ARM 17.8.806 ARM 17.8.807	Ambient Air Increments Ambient Air Ceilings Restrictions on Area Classifications Exclusions from Increment Consumption	The following regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit
ARM 17.8.808 ARM 17.8.825 ARM 17.8.826	Redesignation Sources Impacting Federal Class I Areas Additional Requirements Public Participation	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
ARM 17.8.828	Innovative Control Technology	This regulation is a state regulation, which may not be applicable to the source at this time; however, this regulation may become applicable during the life of the permit.
Subchapter 9 Permit Requirements for Major Stationary Sources or Major Modifications Located Within Nonattainment Areas		
ARM 17.8.901 ARM 17.8.902 ARM 17.8.904	Definitions Incorporation by Reference When Air Quality Preconstruction Permit Required	These rules consist of a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.

Applicable Requirement		Reason
ARM 17.8.905	Additional Conditions of Air Quality Preconstruction Permit	These regulations are state regulations, which may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit.
ARM 17.8.906	Baseline for Determining Credit for Emissions and Air Quality Offsets	
Subchapter 10 Montana Air Quality Permit Requirements for Major Stationary Sources or Major Modifications Located Within Attainment or Unclassified Areas		
ARM 17.8.1001	Definitions	These rules consist of a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1002	Incorporation by Reference	
ARM 17.8.1004	When Air Quality Preconstruction Permit Required	
ARM 17.8.1005	Additional Conditions of Air Quality Preconstruction Permit	These regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit.
ARM 17.8.1006	Review of Specified Sources for Air Quality Impact	
ARM 17.8.1007	Baseline for Determining Credit for Emissions and Air Quality Offsets	
Subchapter 11 Visibility Impact Assessment		
ARM 17.8.1101	Definitions	These rules consist of a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1102	Incorporation by Reference	
ARM 17.8.1103	Applicability --Visibility Requirements	
ARM 17.8.1108	Notification of Permit Application	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
ARM 17.8.1109	Adverse Impact and Federal Land Management	
Subchapter 12 Operating Permit Program		
ARM 17.8.1201	Definitions	These rules consist of a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These types of rules do not have specific requirements associated with them.
ARM 17.8.1202	Incorporation by Reference	
ARM 17.8.1203	Air Quality Operating Program Overview	
ARM 17.8.1234	Acid Rain – Permits Regulation	

Applicable Requirement		Reason
ARM 17.8.1210	General Requirements for Air Quality Permit Content	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source.
ARM 17.8.1211	Requirements for Air Quality Operating Permit Content Relating to Emission Limitations and Standards, and other Requirements Monitoring	
ARM 17.8.1212	Requirements for Air Quality Operating Permit Content Relating to Monitoring, Recordkeeping, and Reporting	
ARM 17.8.1213	Requirements for Air Quality Operating Permit Content Relating to Compliance	
ARM 17.8.1214	Requirements for Air Quality Operating Permit Content Relating to Permit Shield and Emergencies	
ARM 17.8.1215	Requirements for Air Quality Operating Permit Content Relating to Operational Flexibility	
ARM 17.8.1222	General Air Quality Operating Permits	
ARM 17.8.1223	Temporary Air Quality Operating Permits	
ARM 17.8.1225	Additional Requirements for Air Quality Operating Permit Amendments	
ARM 17.8.1228	Additional Requirements for Air Quality Operating Permit Revocation, Reopening, and Revision for Cause	
ARM 17.8.1224	Additional Requirements for Operational Flexibility and Air Quality Operating Permit Changes that Do Not Require Revisions	These are procedural rules that have specific requirements that may become relevant to a major source during the permit span.
ARM 17.8.1226	Additional Requirements for Minor Air Quality Operating Permit Modifications	
ARM 17.8.1227	Additional Requirements for Significant Air Quality Operating Permit Modifications	
Federal Requirements		
40 CFR 51	Requirements for Preparation, Adoption, and Submittal of Implementation Plans	These rules do not have specific requirements for major sources because they are requirements for EPA or state and local authorities. Furthermore, these rules can be used as authority to impose specific requirements on a major source
40 CFR 54	Prior Notice of Citizen Suits	
40 CFR 56	Regional Consistency	

Applicable Requirement		Reason
40 CFR 52	Approval and Promulgation of Implementation Plans	These rules contain requirements for regulatory authorities and not major sources; these rules can be used to impose specific requirements on a major source.
40 CFR 62	Approval and Promulgation of State Plans for Designated Facilities and Pollutants	
40 CFR 70 and 71	State Operating Permit Programs and EPA Regulations on Federal Operating Permit Programs	
40 CFR 81	Designation of Areas for Air Quality Planning Purposes	
40 CFR 60.11	Compliance with Standards and Maintenance Requirements	These regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit.
40 CFR 60.14	Modification	
40 CFR 60.15	Reconstruction	
40 CFR 61	Subpart M National Emissions Standards for Hazardous Air Pollutants – Asbestos	This is a federal regulation that has specific procedural requirements that may become relevant to the major source during the permit term.
40 CFR 63	Subpart A General Provisions	These federal regulations consist of an applicability statement. These regulations may not be applicable to the source at this time; however, these regulations may become applicable during the life of the permit.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards (Part 63)

As of the issuance date of Operating Permit of Operating Permit #OP2783-05, NWE is subject to the area source provisions of 40 CFR 63, Subpart HH. The Department determined that the facility is subject to 40 CFR 63, Subpart ZZZZ, Reciprocating Internal Combustion Engines (promulgated on August 16, 2004) because the facility utilizes several natural gas compressor engines with a maximum rated design capacity greater than 500-hp and the facility is a major source of hazardous air pollutants, as calculated in Subpart ZZZZ. New and existing engines would likely be subject to this rule. The Department is unaware of any proposed or pending MACT standards that may be promulgated that will affect the Cobb Field Storage Station.

B. NESHAP Standards (Part 61)

The Department is unaware of any proposed or pending NESHAP standard that may be promulgated that will affect the Cobb Field Storage Station. However, 40 CFR 61, Subpart M, is always applicable to the facility.

C. NSPS Standards

As of the issuance date of Operating Permit #OP2783-05, the Department is unaware of any proposed or pending NSPS standards that may be promulgated that will affect the Cobb Field Storage Station.

D. Risk Management Plan

As of the issuance date of Operating Permit #OP2783-05, this facility does not exceed the minimum threshold quantities for any regulated substance listed in 40 CFR 68.115 for any facility process. Consequently, this facility is not required to submit a Risk Management Plan.

If a facility has more than a threshold quantity of a regulated substance in a process, the facility must comply with 40 CFR 68 requirements no later than three 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. However, this facility is subject to Department of Transportation (DOT) regulations for accidental release prevention; consequently, this facility is not required to submit a Risk Management Plan.

E. Compliance Assurance Monitoring (CAM) Applicability

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

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

NWE 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.

F. PSD and Title V Greenhouse Gas Tailoring Rule

On May 7, 2010, EPA published the "light duty vehicle rule" (Docket # EPA-HQ-OAR- 2009-0472, 75 FR 25324) controlling greenhouse gas (GHG) emissions from mobile sources, whereby GHG became a pollutant subject to regulation under the Federal and Montana Clean Air Act(s). On June 3, 2010, EPA promulgated the GHG "Tailoring Rule" (Docket # EPA-HQ-OAR-2009-0517, 75 FR 31514) which modified 40 CFR Parts 51, 52, 70, and 71 to specify which facilities are subject to GHG permitting requirements and when such facilities become subject to regulation for GHG under the PSD and Title V programs.

Under the Tailoring Rule, any PSD action (either a new major stationary source or a major modification at a major stationary source) taken for a pollutant or pollutants other than GHG that would become final on or after January 2, 2011 would be subject to PSD permitting requirements for GHG if the GHG increases associated with that action were at or above 75,000 TPY of carbon dioxide equivalent (CO_2e) and greater than 0 TPY on a mass basis. Similarly, if such action were taken, any resulting requirements would be subject to inclusion in the Title V Operating Permit. Facilities which hold Title V permits due to criteria pollutant emissions over 100 TPY would need to incorporate any GHG applicable requirements into their operating permits for any Title V action that would have a final decision occurring on or after January 2, 2011.

Starting on July 1, 2011, PSD permitting requirements would be triggered for modifications that were determined to be major under PSD based on GHG emissions alone, even if no other pollutant triggered a major modification. In addition, sources that are not considered PSD major sources based on criteria pollutant emissions would become subject to PSD review if their facility-wide potential emissions equaled or exceeded 100,000 TPY of CO_2e and 100 or 250 TPY of GHG on a mass basis depending on their listed status in ARM 17.8.801(22) and they undertook a permitting action with increases of 75,000 TPY or more of CO_2e and greater than 0 TPY of GHG on a mass basis. With respect to Title V, sources not currently holding a Title V permit that have potential facility-wide emissions equal to or exceeding 100,000 TPY of CO_2e and 100 TPY of GHG on a mass basis would be required to obtain a Title V Operating Permit.