

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

**Permitting and Compliance Division  
1520 E. Sixth Avenue  
P.O. Box 200901  
Helena, Montana 59620-0901**

**Williston Basin Interstate Pipeline Company  
Saco Compressor Station  
NE¼ of the SW¼ of Section 13, Township 31 North, Range 34 East, in Valley County, Montana  
P.O. Box 131  
Glendive, MT 59330**

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

<b>Facility Compliance Requirements</b>	Yes	No	Comments
Source Tests Required	X		Semiannual
Ambient Monitoring Required		X	
Continuous Opacity Monitoring System (COMS) Required		X	
Continuous Emission Monitoring System (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	
<b>Applicable Air Quality Programs</b>			
ARM Subchapter 7 – Montana Air Quality Permit (MAQP)	X		MAQP #2822-04
New Source Performance Standards (NSPS)		X	
National Emission Standards for Hazardous Air Pollutants (NESHAP)		X	Except for 40 CFR 61, Subpart M
Maximum Achievable Control Technology (MACT)		X	
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

TABLE OF CONTENTS

**SECTION I. GENERAL INFORMATION..... 3**

- A. PURPOSE..... 3
- B. FACILITY LOCATION ..... 3
- C. FACILITY BACKGROUND INFORMATION ..... 3
- D. CURRENT PERMIT ACTION ..... 6
- E. TAKING AND DAMAGING ANALYSIS..... 6
- F. COMPLIANCE DESIGNATION ..... 7

**SECTION II. SUMMARY OF EMISSION UNITS ..... 8**

- A. FACILITY PROCESS DESCRIPTION ..... 8
- B. EMISSIONS UNITS AND POLLUTION CONTROL DEVICE IDENTIFICATION ..... 8
- C. CATEGORICALLY INSIGNIFICANT SOURCES/ACTIVITIES (ALSO KNOWN AS INSIGNIFICANT  
EMITTING UNITS (IEUS))..... 8

**SECTION III. PERMIT CONDITIONS ..... 9**

- A. EMISSION LIMITS AND STANDARDS ..... 9
- B. MONITORING REQUIREMENTS ..... 9
- C. TEST METHODS AND PROCEDURES..... 10
- D. RECORDKEEPING REQUIREMENTS ..... 10
- E. REPORTING REQUIREMENTS ..... 10
- F. PUBLIC NOTICE ..... 10
- G. DRAFT PERMIT COMMENTS ..... 11

**SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS ..... 13**

**SECTION V. FUTURE PERMIT CONSIDERATIONS ..... 14**

- A. MACT STANDARDS ..... 14
- B. NESHAP STANDARDS ..... 14
- C. NSPS STANDARDS ..... 14
- D. RISK MANAGEMENT PLAN ..... 14
- E. CAM APPLICABILITY ..... 14

## 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 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 operating permit application submitted by Williston Basin Interstate Pipeline Company (WBI) on June 12, 1996, the renewal application on September 22, 2008, and the MAQP applications and amendment requests submitted between February 12, 1996, and September 22, 2008.

### B. Facility Location

WBI owns and operates the Saco Compressor Station. This facility is located in the NE $\frac{1}{4}$  of the SW $\frac{1}{4}$  of Section 13, Township 31 North, Range 34 East, in Valley County, Montana. Valley County is designated as an Unclassifiable/Attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The Saco Compressor Station is located in rural agricultural setting approximately 4 miles east of Saco, Montana and  $\frac{1}{2}$  mile south of U.S. Highway 2.

### C. Facility Background Information

#### Montana Air Quality Permit (MAQP)

The Saco Compressor Station was originally constructed by WBI's predecessor, the Montana-Dakota Utilities Company (MDU), in 1934. The original emission sources consisted of three 200 horsepower (hp) Ingersoll-Rand Imperial XG compressor engines (Emitting Unit [EU]001, EU002, and EU003). Over the period from 1934 to 1959, three 300 hp Ingersoll-Rand 8XVG compressor engines (EU004, EU005, and EU006) and a 660 hp Ingersoll-Rand 62 KVG compressor engine (EU007) were added to accomplish capacity upgrades. In addition to the compressor engines, several auxiliary engines were installed during the period between 1934 and 1947. These auxiliary units consisted of the following equipment: two 45 hp Waukesha VRG 330 cooling fan drivers; one 38 hp Waukesha BZ for the gas cooler; one 45 hp Waukesha VRG 330 for the dehydration system; three 12 hp Waukesha FC drivers for jacket water pumps; two 12 hp Waukesha FC engines driving air compressors; and a 10 hp standby generator (243 hp total).

On November 20, 1974, MDU filed docket No. CP75-154 with the Federal Energy Regulatory Commission (FERC), which requested authority to construct and operate the additional facility necessary for the transportation of natural gas from the Bowdoin Field, near Saco, Montana to storage at the Cabin Creek, Montana storage area and to farther sales destinations. During the period from 1974 to 1977 Kansas-Nebraska Gas, Inc. (K-N) aggressively developed the production capacity of the Bowdoin area. In November 1977, K-N completed construction of an extensive gas-gathering network in the Bowdoin Field. Coincidental to this event, and for the purpose of handling K-N's additional gas volumes, WBI initiated a pipeline capacity upgrade project, which included construction of the Vida Compressor Station and installation of two Ajax DPC-600 compressor engines at the Saco Compressor Station (EU008 and EU009).

WBI was issued a FERC certificate on May 11, 1977, to construct and operate those facilities identified in docket No. CP75-154. The purchase order for EU008 and EU009 was issued on March 31, 1978, with a no-charge cancellation date of August 15, 1978. The actual on-site construction of EU008 and EU009 at the Saco station began on April 1, 1979, and was completed by April 26, 1979.

In 1981, WBI decommissioned the three 200 hp Ingersoll-Rand Imperial XG compressor engines (EU001, EU002, and EU003) and replaced their horsepower with a 600 hp Ajax DPC-600 compressor engine (EU010). The purchase order for EU010 was issued on July 28, 1980, with a no-charge cancellation date of November 1, 1980. The actual installation of EU010 was on April 1, 1981, and the project was completed by June 14, 1982. EU010 was originally installed with the high air cylinder modification. This engine modification increases the volume of scavenged air during the purge stroke, thus effectively lowering combustion temperatures.

In 1986, WBI replaced the auxiliary drivers at the Saco station (243 hp total) with electric motors. In conjunction with this switch to electric drivers, a 190 hp Waukesha 6-NKRU/F1905G standby generator set was installed.

In June 1992 WBI modified EU009, a 600 hp Ajax DPC-600 compressor engine, with the high air cylinder modification. This engine modification lowered the nitrogen oxides (NO<sub>x</sub>) emissions from 15.5 grams per brake horsepower-hour (g/bhp-hr) to 6.5 g/bhp-hr and also resulted in a minor increase in fuel efficiency.

In May 1993 WBI had an emission source test conducted to determine the NO<sub>x</sub> and carbon monoxide (CO) emissions from the 300 hp Ingersoll-Rand 8XVG compressor engine (EU004) and the modified 600 hp Ajax DPC-600 compressor engine (EU009). The results of the source test for EU004, based on averaging the three tests, were 13.29 pounds per hour (lb/hr) or 20.62 g/hp-hr for NO<sub>x</sub> and 2.79 lb/hr or 4.34 g/hp-hr for CO. The results of the source test for EU004 were inconclusive for NO<sub>x</sub> because of errors in the testing procedures, but were used to help estimate emissions from EU004, EU005 and EU006. The results of the source test for EU009, based on averaging the three tests, were 2.91 lb/hr or 2.87 g/hp-hr for NO<sub>x</sub> and 1.05 lb/hr or 1.03 g/hp-hr for CO.

In addition to the seven compressor engines (EU004 through EU010) and the standby generator, there are eight natural gas-fired boilers/heaters. The boilers/heaters range from 0.01 million British thermal units per hour (MMBtu/hr) to 2.4 MMBtu/hr maximum heat input. All of the boilers/heaters were installed at various dates between 1934 and 1987. At the time of the initial permit application review the Saco compressor station had estimated potential NO<sub>x</sub> and CO emissions of 567.3 and 176.90 tons per year (TPY), respectively. A Best Available Control Technology (BACT) analysis was conducted as part of the permit review process and, as a result of the Department of Environmental Quality's (Department) BACT determination, the permitted potential emissions would be reduced to 474.60 and 223.06 TPY for NO<sub>x</sub> and CO, respectively, by the addition of control equipment and enforceable emission limits.

The Department issued a Department Decision for a prevention of significant deterioration of air quality (PSD) permit for the WBI Saco compressor station on January 19, 1995. The EPA filed an appeal on February 3, 1995, to challenge the BACT determination made by the Department. EPA cited a need for national uniformity in making such determinations for a PSD permit. A stipulated settlement agreement (stipulation) between the Department, EPA, and WBI was agreed to, which eliminated the issues raised by EPA in the appeal.

The stipulation required WBI to make modifications to the Saco compressor station in order to reduce the facility's potential NO<sub>x</sub> emissions below 250 TPY. WBI was required to install and operate air to fuel ratio (AFR) controllers and/or non-selective catalytic reduction (NSCR) units on any or all of EU004, EU005, EU006, and EU007 in order to keep the combined potential emissions from EU004,

EU005, EU006, and EU007 below 111.0 TPY NO<sub>x</sub> and 149.0 TPY CO. WBI was also required to install and operate all necessary controls by August 1, 1996. Upon issuance of the MAQP, the Saco compressor station was no longer considered a major stationary source, which removed the facility from the PSD permitting requirements. After the installation of the necessary control equipment, NO<sub>x</sub> and CO emission limits for EU004, EU005, EU006, and EU007 were to be established in a permit modification. **MAQP #2822-00** became final on May 19, 1995.

On February 12, 1996, the Department received a request for a permit modification, with the proposed emission limits for EU004, EU005, EU006, and EU007. The modification incorporated the emission control requirements and established NO<sub>x</sub> and CO emission limits for EU004, EU005, EU006, and EU007, as required by Section II.A.6 and II.A.7 of MAQP #2822-00. In addition, the testing, monitoring, and record keeping requirements were updated. **MAQP #2822-01** replaced MAQP #2822-00 on September 1, 1996.

On January 23, 2003, the Department received a letter from WBI dated January 20, 2003. WBI requested the Department to amend MAQP #2822-01 to remove the every 4-year testing requirements from EU004, EU005, EU006, EU007, EU008, EU009, and EU010 because WBI's Title V Operating Permit #OP2822-00 requires the units to be tested every six months.

In addition, on March 14, 2003, the Department received an additional letter from WBI dated March 13, 2003. WBI requested to add a 600 hp Ajax DPC600LE compressor engine (EU011) to the permit according to the provisions of the Administrative Rules of Montana (ARM) 17.8.745.

The administrative amendment removed the every-four-year testing requirements for EU004, EU005, EU006, EU007, EU008, EU009, and EU010 from the permit and added the 600 hp Ajax compressor engine EU011 to the permit according to the provisions of ARM 17.8.745. Emission limits and testing requirements for the 600 hp Ajax Compressor Engine EU011 were incorporated into the permit according to the provisions of ARM 17.8.745(2). Further, the permit format, language, and rule references were updated to reflect current Department permit format, language, and rule references. **MAQP #2822-02** replaced MAQP #2822-01 on April 12, 2003.

On May 9, 2005, the Department received a letter from WBI requesting changes to MAQP #2822-02. The changes included the addition of a 175-kilowatt (kW) generator powered by an F18GL Waukesha lean burn engine (EU013) at the Saco Compressor Station. The generator limited the Waukesha F18GL to 265 hp. The potential emissions from the equipment are less than the de minimis threshold of 15 TPY. WBI also requested the Department remove the 190 hp Waukesha 6-NKRU standby generator engine. The permit action updated the Permit Analysis with the new equipment. **MAQP #2822-03** replaced MAQP #2822-02 on June 18, 2005.

On October 3, 2008, the Department received a letter from WBI requesting changes to MAQP #2822-03. The change included the removal of three Ingersoll-Rand Model 8XVG compressor engines (EU004, EU005, and EU006) with serial numbers 8FV1264, 9GV1450, and 8GV1718, respectively. These units were permanently removed from the facility. Additionally, the change included the removal of a temporary Ajax Model DPC-600LE compressor engine (EU011) which was replaced by an electric prime mover unit which does not have emissions. The Ajax EU011 was removed in June of 2004. In addition, WBI requested that the engine listings be removed from past permits as well as from the current one. The removal actions are not retroactive to past permits and therefore they were not removed from permits predating this action. **MAQP #2822-04** replaced MAQP #2822-03 on January 27, 2009.

## Title V Operating Permit

On June 12, 1996, WBI submitted the original Title V Operating Permit Application for the Saco Compressor Station. The Title V Operating Permit Application was deemed administratively complete on July 12, 1996, and technically complete on August 12, 1996. **Operating Permit #OP2822-00** became final and effective on October 31, 1998.

On March 13, 2003, the Department received an application (de minimis correspondence) for a significant modification to Permit #OP2822-00. WBI requested the Department to modify the permit to include the 600 hp Ajax Compressor Engine (EU011) that was incorporated into the MAQP according to the provisions of ARM 17.8.745. The application was deemed administratively complete on March 14, 2003, and technically complete on March 20, 2003.

In addition, on February 18, 2003, the Department received a Title V renewal application from WBI. WBI informed the Department that the only change at the facility since Operating Permit #OP2822-00 was issued is the addition of the 600 hp Ajax Compressor Engine (EU011), for which WBI had previously submitted a significant modification application. The permit action incorporated the 600 hp Ajax Compressor Engine into the permit and renewed WBI's Title V Operating Permit for the Saco Compressor Station. **Operating Permit #OP2822-01** replaced Operating Permit #OP2822-00.

On May 9, 2005, the Department received a letter from WBI requesting changes to OP2822-01. The changes included the addition of a 175-kW generator powered by an 265 hp F18GL Waukesha lean burn engine (EU013) at the Saco Compressor Station. The generator limits the Waukesha F18GL to 265 hp. WBI also requested that the Department remove the 190 hp Waukesha generator engine 6-NKRU. **Operating Permit #OP2822-02** replaced Operating Permit #OP2822-01.

### **D. Current Permit Action**

On September 22, 2008, the Department received a Title V renewal application from WBI for the Saco compressor station. WBI requested that the renewal of their operating permit reflect the removal of three Ingersoll-Rand Model 8XVG compressor engines (EU004, EU005, and EU006) with serial numbers 8FV1264, 9GV1450, and 8GV1718, respectively. These units have been permanently removed from the facility. Additionally, WBI had also removed a temporary Ajax Model DPC-600LE compressor engine (EU011) which was replaced by an electric prime mover unit which does not have emissions. The Ajax EU011 was removed in June of 2004. Except for the removal of EU004, EU005, EU006, and EU011, there have been no other substantive changes to emission unit descriptions, ancillary equipments, BACT determinations, air dispersion analyses, stack heights, or compliance demonstration practices since the issuance of WBI's previous operating permit for the Saco compressor station. **Operating Permit #OP2822-03** replaces Operating Permit #OP2822-02.

### **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 WBI Saco Compressor Station was last inspected on October 17, 2008. During the inspection, the facility was in compliance with both applicable air quality permits; MAQP #2822-03 and Title V Operating Permit #OP2822-02. Since the October 17, 2008 inspection, the Saco Compressor Station MAQP has incremented to MAQP #2822-04 to reflect the removal of three Ingersoll-Rand Model 8XVG compressor engines (EU004, EU005, and EU006) with serial numbers 8FV1264, 9GV1450, and 8GV1718, respectively. These units were permanently removed from the facility. Additionally, the change included the removal of a temporary Ajax Model DPC-600LE compressor engine (EU011) which was replaced by an electric prime mover unit which does not have emissions.

## SECTION II. SUMMARY OF EMISSION UNITS

### A. Facility Process Description

The Saco Compressor Station pulls suction on field gathering lines in order to produce gas from the fields within the vicinity. Facility equipment is operated to condition the produced gas by removing moisture within the gas. The gas is subsequently injected into WBI's transmission pipeline for transportation to storage fields or to natural gas markets.

### B. Emission Units and Pollution Control Device Identification

Emissions Unit ID	Description	Pollution Control Device/Practice
EU007	660 hp* (560 hp site-derated) Ingersoll-Rand 26KVG Reciprocating Engine	NSCR Unit and AFR Controller
EU008	600 hp* (538 hp site-derated) Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU009	600 hp* (538 hp site-derated) Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU010	600 hp* (534 hp site-derated) Ajax DPC-600 Reciprocating Engine	Ajax Low Emission Conversion Kit
EU013/GEN 1	175 kW Electrical Generator Driven by a 265 hp Waukesha F18GL Reciprocating Engine	Lean Burn Design/No Control

**NOTES:**

- Emission limits for NO<sub>x</sub>, CO, and volatile organic compounds are based on the maximum rated hp

### C. Categorically Insignificant Sources/Activities (also known as Insignificant Emitting Units (IEUs))

Emissions Unit ID	Description
IEU001/FUG 1	Fugitive VOC emissions from valves, flanges, open-ended lines, and seals
IEU002/MISC 1	2.40 MMBtu/hr Natural Gas-Fired Petro-Chem Dehydration Regeneration Heater Unit
IEU003/MISC 2	0.65 MMBtu/hr natural gas-fired Weil-McLain LGB-6 boiler
IEU004/MISC 3	0.65 MMBtu/hr natural gas-fired Weil-McLain LGB-6 boiler
IEU005/MISC 4	0.20 MMBtu/hr natural gas-fired Modine PA 200 space heater
IEU006/MISC 5	0.13 MMBtu/hr natural gas-fired Janitrol 68-130-8 space heater
IEU007/MISC 6	0.25 MMBtu/hr natural gas-fired shop space heater
IEU008/MISC 7	0.04 MMBtu/hr natural gas-fired AO Smith water heater
IEU009/MISC 8	0.01 MMBtu/hr natural gas-fired Breust space heater
IEU010/Tank 1	8,000 gallon methanol storage tank
IEU011/Tank 2	6,000 gallon odorant (methyl mercaptan) tank
IEU012 & 13/ Tank 3 & 4	2 ethylene glycol storage tanks, combined 750 gallon capacity
IEU014/Tank 5	1000 gallon slop/drip oil tank

## SECTION III. PERMIT CONDITIONS

### A. Emission Limits and Standards

The 660 hp Ingersoll-Rand 26KVG Compressor Engine (EU007) is limited to 4.60 lb/hr for NO<sub>x</sub> and 17.50 lb/hr for CO. The NO<sub>x</sub> and CO emission limits for the engine were established under ARM 17.8.749. Emissions from the engine are required to be controlled by an NSCR unit and an AFR controller. In addition, emissions from the engine are limited to 20% opacity averaged over six consecutive minutes and PM caused by the combustion of fuel is limited to  $E=0.882 \cdot H^{-0.1664}$  where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in pounds per million British thermal units (lb/MMBtu). The opacity and PM limits were established under ARM 17.8.304(2) and 17.8.309(2), respectively. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. The limitation on sulfur compounds in fuel was established under ARM 17.8.322(5).

Each of the three 600 hp Ajax DPC-600 Compressor Engines (EU008, EU009, and EU010) is limited to 8.60 lb/hr for NO<sub>x</sub>, 3.97 lb/hr for CO, and 6.62 lb/hr for volatile organic compounds (VOC). The NO<sub>x</sub>, CO, and VOC emission limits for the engines were established under ARM 17.8.752. Emissions from the engines are required to be controlled by an Ajax low emission conversion kit. In addition, emissions from the engines are limited to 20% opacity averaged over six consecutive minutes and PM caused by the combustion of fuel is limited to  $E=1.026 \cdot H^{-0.233}$  where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lb/MMBtu. The opacity and PM limits were established under ARM 17.8.304(2) and 17.8.309(2), respectively. Further, fuel burned in the engines must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. The limitation on sulfur compounds in fuel was established under ARM 17.8.322(5).

The Saco GEN 1 (EU013) generator engine shall not exceed 265 hp in rated capacity, emissions from the engine are limited to 20% opacity averaged over 6 consecutive minutes and particulate matter caused by the combustion of fuel is limited to  $E=1.026 \cdot H^{-0.233}$  where H is the heat input capacity in MMBtu/hr and E is the maximum allowable emission rate in lb/MMBtu. The opacity and PM limits were established under ARM 17.8.304(2) and 17.8.309(2), respectively. Further, fuel burned in the engine must not contain sulfur compounds in excess of 50 grains per 100 standard cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. The limitation on sulfur compounds in fuel was established under ARM 17.8.322(5).

### B. Monitoring Requirements

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

The requirements for testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance do not require the permit to impose the same level of rigor for all emission units. Furthermore, they do not require extensive testing or monitoring to assure compliance with the applicable requirements for emission units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. When compliance with the underlying applicable requirement for 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 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**

The testing requirements for EU007 through EU009 were removed from the MAQP, at the request of WBI, because the initial testing requirements had been met and WBI's final and effective Title V Operating Permit requires the emitting units to be tested semiannually.

Compliance with the opacity, particulate from fuel combustion, sulfur compounds in fuel (gaseous), and VOC limitations in the permit may be demonstrated by burning pipeline quality natural gas (as defined by WBI's FERC gas tariff) on an ongoing basis.

Title V Operating Permit #OP2822-03 contains requirements for semiannual testing with a portable analyzer for all of the emitting units contained in the permit. 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." WBI may use another testing procedure as approved in advance by the Department. All compliance source tests must be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106). WBI will then convert the NO<sub>x</sub> and CO emissions test results from a parts per million (ppm) value to a pounds per hour (lb/hr) emission rate. 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 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, the WBI may elect to voluntarily conduct compliance testing to confirm its compliance status.

### **D. Recordkeeping Requirements**

The permittee is required to keep all records listed in the operating permit as a permanent business record for at least 5 years following the date of the generation of the record.

### **E. Reporting Requirements**

Reporting requirements are included in the permit for each emissions unit and Section V of the operating permit "General Conditions" explains the reporting requirements. However, the permittee is required to submit 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.

### **F. Public Notice**

In accordance with ARM 17.8.1232, a public notice was published in the *Glasgow Courier* newspaper on or before November 11, 2009. The Department provided a 30-day public comment period on the draft operating permit from November 4, 2009, to December 4, 2009. ARM 17.8.1232

requires the Department to keep a record of both comments and issues raised during the public participation process. The comments and issues received by December 4, 2009, are summarized, along with the Department's responses, in the following tables.

### Summary of Public Comments

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

### G. Draft Permit Comments

#### Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
Operating Permit (OP) Section II Table	WBI requests that site-rated hp be added to the description for EU007-EU010.	The Department has added this information to the unit descriptions within the table.
OP Section II Table	WBI requests that EU014, the 2.40 MMBtu/hr Natural Gas-Fired Petro-Chem Dehydration Regeneration Heater be removed from this Table and added to the list of Insignificant Emissions Units in Appendix A.	The Department concurs that EU014 meets the requirements of an insignificant emitting unit and the unit has been removed from the summary of emissions units and listed as an Insignificant Emitting Unit.
OP Section III.E	WBI requests that this section of the OP be removed because the unit is an insignificant emissions unit and not subject to 40 CFR 63, Subpart HH.	The Department concurs with this request because the unit is an insignificant emissions unit that is not subject to 40 CFR 63, Subpart HH.
OP Appendix A	WBI requests that EU014 be listed among the Insignificant Emission Units.	The Department concurs with this request.
Technical Review Document (TRD)	WBI requests that any references to the applicability of 40 CFR 63, Subpart HH be removed.	The Department concurs with this request.
TRD Section II.B	WBI requests that EU014 be removed from this Table and added to the Table of Insignificant Emitting Units in TRD Section II.C.	The Department concurs with this request.
TRD Section IV	WBI requests that 40 CFR 63, Subpart HH be added to the list of non-applicable requirements.	This section of the TRD is typically reserved for describing requirements that the applicant designated as non-applicable in their application but the Department determined either are applicable or could likely be applicable in the future. The Department feels that it is not appropriate to address 40 CFR 63, Subpart HH within this section; however, Section V has been amended to describe that the Saco Compressor Station is not currently subject to 40 CFR 63, Subpart HH.
TRD Section V	WBI requests that the statement about 40 CFR 63, Subpart HH applicability be removed from this section.	The Department concurs that 40 CFR 63, Subpart HH is not applicable to the Saco facility. However, the Department feels that it is more appropriate to describe within this Section that 40 CFR 63, Subpart HH is not applicable at this time rather than remove the statement entirely.

### Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
	No comments received.	

#### SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Section IV of Permit #OP2822-03 “Non-Applicable Requirements” contains the requirements that the Department determined were non-applicable. The following paragraphs summarize the requirements that WBI identified as non-applicable and contains the reasons that the Department did not include these requirements as non-applicable in the permit.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines is not applicable to the engines at the Saco Compressor Station at this time because they were manufactured and installed before the applicable dates outlined in the subpart. However, future engine installations or replacements may be subject to 40 CFR 60 Subpart JJJJ.

40 CFR 63 Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (HAP) for Stationary Reciprocating Internal Combustion Engines does not apply to the engines installed at the Saco Compressor Station at this time because the station is not a major source of HAPs. Subpart ZZZZ defines a major source of HAPs as a plant site that emits or has the potential to emit any single HAP at a rate of 10 TPY or more or any combination of HAPs at a rate of 25 TPY or more. An area source of HAP is defined as a source with HAP emissions that is not a major source. Subpart ZZZZ does have requirements for certain engines at area sources of HAPs. The Saco Compressor station is an area source for HAPs; therefore, 40 CFR 63 Subpart ZZZZ may have applicability on future engine replacements or installations.

## SECTION V. FUTURE PERMIT CONSIDERATIONS

### A. MACT Standards

As of the issuance of Operating Permit #OP2822-03, 40 CFR 63, Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines could potentially be applicable to this facility in the future.

40 CFR 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities applies to owners and operators of emission points located at oil and natural gas production facilities. The Saco Compressor Station is not an affected facility and it does not contain affected equipment based on the criteria within 40 CFR 63, Subpart HH. Therefore, the Saco Compressor Station is not currently subject to any requirements of 40 CFR 63, Subpart HH.

### B. NESHAP Standards

As of the issuance date of Operating Permit #OP2822-03, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility.

### C. NSPS Standards

As of the issuance date of Operating Permit #OP2822-03, 40 CFR 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines could potentially be applicable to this facility in the future.

### D. Risk Management Plan

As of this date (11/25/09), 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 June 21, 1999; 3 years after the date on which a regulated substance is first listed under 40 CFR 68.130; or the date on which a regulated substance is first present in more than a threshold quantity in a process, whichever is later.

### E. CAM Applicability

The emitting units at the Saco Compressor Station do not meet all of the criteria listed in ARM 17.8.1503 and therefore do not require CAM. Unit EU007 does use an NSCR pollution control device to reduce its NO<sub>x</sub> and CO emissions; however, CO and NO<sub>x</sub> emissions would not exceed the major source threshold regardless of control, therefore CAM would not apply.