

**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**

**Anchor Light Montana, LLC
Culbertson Facility
SW¼ of the SE¼ of Section 28, Township 28 North, Range 56 East, in Roosevelt County
Highway 2 East
Culbertson, MT 59218**

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		Method 9 and Method 5
Ambient Monitoring Required		X	
COMS Required		X	
CEMS Required		X	
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 Permit	X		MAQP #2949-02
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 GGGG
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 State 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 SVO Specialty Products, Inc. on June 11, 1996, additional information submitted by Montola Growers, Inc. on June 30, 1997, and March 20, 1998, a renewal application submitted by Montola on September 23, 2003, significant modification application submitted by Montola on August 17, 2006, the renewal application submitted by Montola on January 2, 2009, and permit transfer request submitted by Anchor Light Montana, LLC (ALM) on March 22, 2010.

B. Facility Location

ALM owns and operates the vegetable oil processing facility located in the SW¹/₄ of the SE¹/₄ of Section 28, Township 28 North, Range 56 East, in Roosevelt County, Montana. Roosevelt County is designated as an Unclassifiable/attainment area for National Ambient Air Quality Standards (NAAQS) for all criteria pollutants. The facility has a total property area of 54.45 acres.

C. Facility Background Information

Montana Air Quality Permit

Montana Air Quality Permit (MAQP) #2949-00 was issued to SVO Specialty Products, Inc. on April 6, 1997, to operate the vegetable oil processing facility in Culbertson, Montana.

On June 18, 1997, **MAQP #2949-01** was issued to Montola Growers, Inc. The Department of Environmental Quality (Department) received a request that Permit #2949-00 be modified to reflect a change in the ownership of the facility from SVO Specialty Products, Inc. to Sheridan Electric Cooperative. The facility operated under the name Montola Growers, Inc.

On December 26, 2005, the Department received a request to transfer the permit ownership from Sheridan Electric Co-op, Inc. to Sustainable Systems, LLC. The Culbertson facility remained under the name of Montola, as a division of the company. On June 15, 2006, the Department received an application for the replacement of the existing 300-ton per day (tpd) oilseed extraction equipment with a new 600-tpd extractor, desolventizer/toaster-dryer/cooler (DTDC), and distillation system. The facility will become a major source under the Prevention of Significant Deterioration (PSD) program, because the potential to emit exceeds 250 tons per year (tpy) of Volatile Organic Compound (VOC). The application was deemed complete on August 17, 2006. The permit was also updated to reflect the current permit language and rule references used by the Department. **MAQP #2949-02** issued on November 14, 2006, and replaced MAQP #2949-01.

Title V Operating Permit

Title V Operating Permit #OP2949-00 was issued final and effective on January 1, 1999.

The Department received a request from Montola on September 23, 2003, for the renewal of Operating Permit #OP2949-00. The Department updated the permit with respect to the facility's replacement of the Bethlehem Boiler with a Hurst boiler. Operating Permit #OP2949-00 contained statements requiring Montola to use pipeline-quality natural gas as a method of monitoring compliance. However, natural gas was not available to the facility and therefore Montola used propane gas for operation of the facility. This change was reflected in the renewal. In addition, the Department updated the permit language and format. **Operating Permit #OP2949-01** replaced Operating Permit #OP2949-00.

On December 26, 2005, the Department received a request to transfer the permit ownership from Sheridan Electric Co-op, Inc. to Sustainable Systems, LLC. The Culbertson facility remained under the name of Montola, as a division of the company. On June 15, 2006, the Department received, concurrent to the MAQP modification for the replacement of the existing 300-ton per day (TPD) oilseed extraction equipment with a new 600-TPD extractor, desolventizer/toaster-dryer/cooler (DTDC), and distillation system, a Title V significant modification application. **Operating Permit #OP2949-02** was issued final on January 28, 2008 and replaced Operating Permit #OP2949-01.

D. Current Permit Action

Operating Permit #OP2949-02 was due to expire on July 7, 2009. On January 2, 2009 Montola submitted a renewal application, which was deemed complete on February 12, 2009. The renewal application was assigned Operating Permit #OP2949-03. In addition, on March 22, 2010, ALM submitted a transfer of ownership notification from Montola to ALM. The permit has been updated to reflect the current permit language and rule references used by the Department as well as the transfer of ownership. **Operating Permit #OP2949-03** replaces Operating Permit #OP2949-02.

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 Department conducted a Full Compliance Evaluation (FCE) of the Montola facility in 2009 and 2007. The Compliance Monitoring Reports (CMR) filed June 16, 2009, and August 14, 2007, respectively, were based in-part on inspections conducted at the facility on June 3, 2009 and June 5, 2007, respectively, and indicated the facility was in compliance with MAQP #2949-02 and Operating Permit #OP2949-02. Since those compliance activities Montola submitted its 2009 semi-annual compliance certifications that were approved by the Department on September 4, 2009, and submitted its 2009 annual compliance certification on February 8, 2010, that has not been approved to date.

Prior to these compliance activities the Montola facility was inspected on February 10, 1999, June 14, 2000, June 12, 2001, September 18, 2002, September 3, 2003, and June 24, 2005. There is no record of violations of the conditions of the facility's permit.

SECTION II. SUMMARY OF EMISSION UNITS

A. Facility Process Description

ALM processes oilseeds: primarily sunflower, canola, and safflower. The process includes seed cleaning, conditioning, crushing, oil extraction, meal grinding, and storage, in addition to vegetable oil processing. Vegetable oil processing includes refining, bleaching, de-waxing/winterizing, and deodorization.

The oilseeds used as raw material feedstock are received primarily by trucks, but are also received by railcar. The oilseeds are sampled and analyzed for moisture content, foreign matter and test weight. The oilseeds are weighed and conveyed to large metal tanks for storage prior to processing. Unloading of oilseed trucks is accomplished under building cover with bucket elevators and covered conveying systems. Railcar unloading is accomplished by a fixed covered conveying system.

The oilseeds are removed from the storage bins and cleaned of foreign material prior to conditioning. Screen cleaners are used to remove foreign materials such as sticks, stems, pods, tramp metal, sand, and dirt. An aspiration system is used to remove the empty seeds and light material from the product stream.

Next, the oilseeds are conveyed to a flaker where smooth cylindrical rolls press the seeds into smooth “flakes” which vary in thickness from approximately 0.010 to 0.020 inches. Flaking allows the oilseed oil cells to be exposed and the oil to be more easily extracted. The flakes are conveyed to the conditioning area where they are put through a stacked cooker and are heated to “condition” them. Physical oil extraction is then performed through the use of expellers. An expeller is a tapered screw press that removes oil through a mechanical pressing action. All flaking, conditioning, and expeller pressing steps are performed within the Mill building on the plant site.

The expeller cake (containing approximately 15% to 20% vegetable oil) is conveyed to the Solvent Extraction Process. This process consists of washing the oil from the expeller cake with hexane in a deep bed extractor. The solvent is evaporated from both the solvent/oil mixture and the solvent-laden, defatted flakes. The oil is desolventized by exposing the solvent/oil mixture to steam. Then the solvent is condensed, separated from the steam condensate, and reused. Residual hexane vapor not condensed is absorbed with a mineral oil scrubber, separated from the mineral oil and steam condensate, and reused in the extraction process.

The desolventized oil, called crude solvent vegetable oil, is pumped to a metering tank before being pumped to a large storage tank. All steps of the solvent extraction process are performed within the solvent plant building. All vegetable oil storage tanks have fixed roofs and are located within a diked retaining area. The flakes leaving the extractor contain up to 35 to 40% solvent and must be desolventized before use. Solvent-laden flakes are desolventized by conventional desolventization. This takes place in a desolventizer-toaster, where both contact and non-contact steam area used to evaporate the hexane. In addition, the contact steam “toasts” the flakes, making them more usable for animal feeds. The desolventized and toasted flakes then pass to a cooler, where ambient air is used to reduce the temperature of the flakes. The desolventized flakes are ground for use as meal. Meal is conveyed to fixed roof storage. Meal truck loadout is accomplished under building cover.

Refining, bleaching, dewaxing/winterizing, and deodorization of vegetable oil is performed within the refinery and dewax refinery buildings. Refining is the neutralization of the free fatty acids (FFA) in the vegetable oil through use of a caustic solution, bleaching is the color removal from the oil through use of a chilling and filtering process, and deodorization is the final processing step that removes any remaining impurities, odors, flavors, and FFA. Byproducts produced in the refinery including soapstock, spent bleaching earth, dewaxing foots, and deodorizer distillate.

B. Emission Units and Pollution Control Device Identification

Emissions Unit ID	Description	Pollution Control Device/Practice
EU001	Eclipse Boiler (500 hp)	No controls
EU002	Hurst Boiler (500 hp)	No controls
EU003	Dowtherm Boiler (125 hp)	No controls
EU004	Oilseed Extractor	No Controls
EU005	Desolventizer/Toaster-Dryer/Cooler (DTDC)	Deck Cyclones
EU006	Distillation System	No Controls
EU007	Mineral Oil Absorption Exhaust	Mineral Oil Scrubber
EU008	Meal Cooler Exhaust	No controls
EU009	Hexane Storage Tank	No controls
EU010	Solvent Metering Tank #3	No controls
EU011	Solvent Metering Tank #4	No controls
EU012	Hexane Purge Fan	No controls
EU013	Meal Grinder Discharge	Carter Day Cyclone
EU014	Seed Cleaner Discharge	Carter Day Cyclone
EU015	Railcar and Truck Meal Loading	Enclosure/Boots

C. Categorically Insignificant Sources/Activities

The following table of insignificant sources and/or activities were provided by Montola. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

These emitting units are considered insignificant because their potential emissions are less than 5 TPY and they have no applicable requirements other than those generally applicable to the entire facility.

Emissions Unit ID	Description
IEU01	Crystallizer/Precoat Tank Vent
IEU02	Railcar and Truck Oilseed Unloading
IEU03	Boiler Blowdowns
IEU04	Air Exchange Ventilation System
IEU05	Refinery Building Exhaust
IEU06	Refinery Boiler Building Exhaust
IEU07	Dewaxing Boiler Building Exhaust
IEU08	Hotwells
IEU09	Office furnace and Water Heater Exhaust
IEU10	Sewer Manholes
IEU11	Refinery and Solvent Plant Waste Water Lift Stations
IEU12	Sanitary Sewer Lift Station
IEU13	Propane Truck Venting and Loading
IEU14	Space Heater
IEU17	Meal Silo #1
IEU18	Meal Silo #2
IEU19	Meal Silo #3
IEU20	Meal Silo #4
IEU21	Meal Warehouse #6
IEU22	Meal Warehouse #7
IEU23	Cooling Tower
IEU24	Expeller Steam Exhaust
IEU25	Cooker Exhaust
IEU26	Deodorizer Vacuum Pump Discharge
IEU27	Vacuum Bleach Tank Vacuum Pump
IEU28	Refinery Wastewater Lift Station
IEU29	Sanitary Sewer Lift Station
IEU30	Solvent Plant Wastewater Lift Station
IEU31	Filter foot/Spent Bleaching Earth Disposal Area

Emissions Unit ID	Description
IEU32	Seed Storage Bins
IEU33	Bucket Elevators
IEU34	Conveying Systems
IEU35	Containment Pond
IEU36	Wastewater Sump

SECTION III. PERMIT CONDITIONS

A. Emission Limits and Standards

No new emission limits or standards are identified in this permit that were not previously applicable to the facility. All of the emission limits are listed in the operating permit along with the applicable rule citation for each limit.

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 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 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 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 permittee may elect to voluntarily conduct compliance testing to confirm its compliance status.

ALM is not required to routinely test any of the three boilers used at this facility. All 3 boilers are required to use Propane Gas continuously; therefore, they are not likely to exceed the particulate limit or the sulfur compounds limit.

The emitting units that make up the solvent extraction system have very little particulate exhaust and are not likely to exceed the particulate limit or the opacity limit. Therefore, they are only required to test these sources at the Department's request.

ALM is required to conduct weekly visual surveys on the meal grinder cyclone discharge, both seed cleaner cyclone discharges, and the meal dump scale cyclone discharge to maintain compliance with the opacity limits. In addition, a Method 5 test as required by the Department will monitor compliance with the particulate limit.

ALM is required to keep a maintenance log as a means of compliance with permit conditions for the Railcar and Truck Meal Loading Station. In addition to the maintenance log, this source is required to operate and maintain all existing enclosures as a means of pollution control.

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 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.

ALM is a major source of Hazardous Air Pollutant (HAP) emissions (specifically hexane). The total HAPs are primarily fugitive emissions from the solvent recovery process in the oil refinery portion of this process. ALM is subject to 40 CFR 63, Subpart GGGG - Oil Extraction for Vegetable Oil Production that was promulgated on April 12, 2001. The original compliance date was April 12, 2004, however, ALM filed for an extension which was granted by the Department for a one - year period. Following that extension, ALM changed ownership and modifications to the facility have been made to enable ALM to be in compliance with Subpart GGGG. ALM was required to be in compliance with Subpart GGGG as of April 12, 2005.

F. Public Notice

In accordance with ARM 17.8.1232, a public notice was published in the *Billings Gazette* newspaper on or before April 2, 2010. The Department provided a 30-day public comment period on the draft operating permit from April 2, 2010, to May 3, 2010. 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 May 3, 2010, will be summarized, along with the Department's responses, in the following table. All comments received during the public comment period will be promptly forwarded to ALM so they may have an opportunity to respond to these comments as well.

G. Draft Permit Comments

Summary of Permittee Comments

Permit Reference	Permittee Comment	Department Response
NA	No Comments Received	NA

Summary of EPA Comments

Permit Reference	EPA Comment	Department Response
NA	No Comments Received	NA

SECTION IV. NON-APPLICABLE REQUIREMENT ANALYSIS

Pursuant to ARM 17.8.1221, Montola requested a permit shield from all requirements that were identified as non-applicable in its original permit application (#OP2949-00). 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 Montola Growers, Inc. identified as non-applicable in the permit application but will not be included in the operating permit as non-applicable. The table includes both the applicable requirement and reason that the department did not identify this requirement as non-applicable.

Applicable Requirement	Reason(s) for Not Including in Permit
40 CFR 53 Ambient Air Monitoring Reference and Equivalent Plans 40 CFR 54 Prior Notice of Citizen Suits 40 CFR 56 Regional Consistency 40 CFR 58 Ambient Air Quality Standards	These rules have been excluded from Title V as applicable requirements. However, these rules can be used to impose specific requirements on a major source.
40 CFR 63 National Emissions Standards for Hazardous Air Pollutants	This facility has an applicable MACT Standard scheduled for promulgation during the term of the permit.
40 CFR 71 Federal Operating Permit Program	Because rules contain requirements for regulatory authorities and not major sources, these rules can be used to impose specific requirements on a major source.
ARM 17.8.120 Variance Procedures	This is a procedural rule that has specific requirements that may become relevant to a major source during the permit span.
ARM 17.8.130 Enforcement Procedures - Notice of Violation - Order to take Corrective Action	This rule has been excluded from Title V as an applicable requirement. However, these rules can be used to impose specific requirements on a major source.
ARM 17.8.301 Emissions Standards - Definition ARM 17.8.401 Stack Heights and Dispersion Techniques - Definitions ARM 17.8.801 Prevention of Significant Deterioration - Definitions ARM 17.8.901 Permit Requirements for Major Stationary Sources or Modifications Located Within Nonattainment Areas - Definitions ARM 17.8.1001 Preconstruction Permit Requirements for Major Stationary Sources or Major Modifications Located Within Attainment or Unclassified Areas - Definitions ARM 17.8.1101 Visibility Impact Assessment - Definitions	These rules consist of a statement of purpose, applicability statement, regulatory definitions or a statement of incorporation by reference. These rules do not have specific requirements associated with it.

SECTION V. FUTURE PERMIT CONSIDERATIONS

A. MACT Standards

As of the Draft date of Operating Permit #OP2949-03, the Department is unaware of any future MACT Standards that may be promulgated that will affect this facility. The MACT Standard 40 CFR 63, Subpart GGGG does apply to the facility at this time.

B. NESHAP Standards

As of the Draft date of Operating Permit #OP2949-03, the Department is unaware of any future NESHAP Standards that may be promulgated that will affect this facility. NESHAP Standard 40 CFR 61, Subpart M does apply to the facility at this time.

C. NSPS Standards

As of the Draft date of Operating Permit #OP2949-03, the Department is unaware of any future NSPS Standards that may be promulgated that will affect this facility.

D. Risk Management Plan

As of this date (04/02/10), 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

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 emissions of the applicable regulated air pollutant that is greater than major source thresholds.

ALM does not currently have any emitting units that meet all the applicability criteria in ARM 17.8.1503 under Operating Permit #OP2949-03, and is therefore not currently required to develop a CAM Plan for the Culbertson oil seed facility.