

April 12, 2022

Patrick M. Montalban  
Monte Grande Glacier Gathering, LLC.  
P.O. Box 200  
Cut Bank, MT 59427

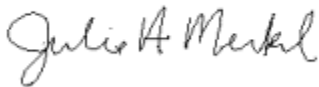
Sent via email: patrickm@mogo-inc.com

**RE: Final Permit Issuance for MAQP #2737-09**

Dear Mr. Montalban:

Montana Air Quality Permit (MAQP) #2737-09 is deemed final as of April 1, 2022, by DEQ. This permit is for a natural gas compressor station. All conditions of the Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For DEQ,



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



John P. Proulx  
Environmental Scientist 2  
Air Quality Bureau  
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Montana Department of Environmental Quality  
Air, Energy & Mining Division  
Air Quality Bureau



Montana Air Quality Permit #2737-09

Monte Grande Glacier Gatherings, LLC.  
P.O. Box 200  
Cut Bank, MT 59427

April 01, 2022

## MONTANA AIR QUALITY PERMIT

Issued To: Monte Grande Glacier Gathering, LLC. MAQP #2737-09  
Cut Bank Field, Station 015 Administrative Amendment (AA)  
P.O. Box 200 Received: 02/23/2022  
Cut Bank, MT 59427 Department Decision on AA: 03/16/2022  
Permit Final: 04/01/2022

A Montana Air Quality Permit (MAQP), with conditions, is hereby granted to the Monte Grande Glacier Gathering, LLC. (MGGG) - Cut Bank Field, Station 015 pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and the Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

### SECTION I: Permitted Facilities

#### A. Plant Location

This permit is for the operation of a natural gas compressor station, known as the Cut Bank Field, Station 015 Compressor Station, located in the SW  $\frac{1}{4}$  of the NW  $\frac{1}{4}$  of Section 4, Township 34 North, Range 5 West, Glacier County, Montana. A complete list of the permitted equipment is contained in Section I.A. of the permit analysis.

#### B. Current Permit Action

On February 23, 2022, the Department of Environmental Quality, Air Quality Bureau (DEQ) received a request to transfer ownership of the MAQP for the Cut Bank Field, Station 015 from Omimex Canada, Ltd., to Monte Grande Glacier Gathering, LLC. The current permit action is an administrative amendment pursuant to the ARM 17.8.764 that transfers ownership of the MAQP, as requested and updated the permit to include current DEQ language and references.

### SECTION II: Conditions and Limitations

#### A. Emission Limitations

1. MGGG shall not operate or have on-site more than one natural gas compressor engine at any time and the maximum rated design capacity shall be 425 bhp. The engine shall be of a 4-stroke rich-burn class and shall be fired on pipeline quality natural gas (ARM 17.8.749).
2. MGGG shall operate and maintain the compressor engine and associated control equipment as designed to provide the maximum control of air pollutants. The engine shall be equipped and operated with an AFR controller and an NSCR unit (ARM 17.8.752).

3. The pound per hour (lb/hr) emission limits shall be determined using the following equation and pollutant-specific grams per brake horsepower-hour (g/bhp-hr) emission factors (ARM 17.8.752):

Equation:

Emission Limit (lb/hr) = Emission Factor (g/bhp-hr)\*maximum rated design capacity of engine (bhp)\*0.002205 lb/g

Emission Factors

Oxides of Nitrogen (NO <sub>x</sub> ):	2.0 g/bhp-hr
Carbon Monoxide (CO):	2.0 g/bhp-hr
Volatile Organic Carbon (VOC):	0.5 g/bhp-hr

4. MGGG shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any sources installed or modified after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
5. MGGG shall not cause or authorize emissions to be discharged into the atmosphere from haul roads, access roads, parking lots, or the general plant property without taking reasonable precautions to control emissions of airborne particulate matter (ARM 17.8.308).
6. MGGG shall treat all unpaved portions of the access roads, parking lots, and general plant area with fresh water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions requirement in Section II.A.5 (ARM 17.8.752).
7. MGGG shall comply with all applicable standards and limitations, reporting, recordkeeping and notification requirements contained in 40 Code of Federal Regulation (CFR) 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* (ARM 17.8.340 and 40 CFR 63, Subpart ZZZZ).

B. Testing Requirements

1. The compressor engine shall be initially tested for NO<sub>x</sub> and CO (the pollutants to be tested concurrently). The initial testing shall be conducted within 180 days of the initial start-up date of the compressor engine(s). After the initial source test, additional testing shall continue on an every 4-year basis, or according to another testing/monitoring schedule as may be approved by DEQ, to demonstrate compliance with the NO<sub>x</sub> and CO lb/hr emission limits as calculated in Section II.A.3 (ARM 17.8.105 and ARM 17.8.749).
2. All compliance source tests shall be conducted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).

3. DEQ may require testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. MGGG shall supply DEQ with annual production information for all emission points, as required by the DEQ in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the most recent emission inventory report and sources identified in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the DEQ by the date required in the emission inventory request. Information shall be in units as required by DEQ. This information may be used for calculating operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. MGGG shall notify DEQ of any construction or improvement project conducted pursuant to ARM 17.8.745, that would include the ***addition of a new emission unit***, change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation. The notice must be submitted to DEQ, in writing, 10 days prior to start-up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change and must include the information requested in ARM 17.8.745(1)(d) (ARM 17.8.745).
3. All records compiled in accordance with this permit must be maintained by MGGG as a permanent business record for at least 5 years following the date of the measurement, must be available at the plant site for inspection by the DEQ, and must be submitted to DEQ upon request (ARM 17.8.749).

D. Notification

1. MGGG shall provide DEQ with written notification of the commencement of installation of the new compressor engine postmarked within 30 days of the installation (ARM 17.8.749).
2. MGGG shall provide DEQ with written notification of the actual startup date of the compressor engine postmarked within 15 days after the actual start-up date (ARM 17.8.749).

SECTION III: General Conditions

- A. Inspection – MGGG shall allow DEQ's representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (Continuous Emissions Monitoring Systems (CEMS), Continuous Emissions Rate Monitoring System (CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.

- B. Waiver – The permit and all the terms, conditions, and matters stated herein shall be deemed accepted if the recipient fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving MGGG of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740 et seq. (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement as specified in Section 75-2-401 et seq., MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the DEQ's decision may request, within 15 days after DEQ renders its decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The filing of a request for a hearing does not stay DEQ's decision, unless the Board issues a stay upon receipt of a petition and a finding that a stay is appropriate under Section 75-2-211(11)(b), MCA. The issuance of a stay on a permit by the Board postpones the effective date of DEQ's decision until conclusion of the hearing and issuance of a final decision by the Board. If a stay is not issued by the Board, DEQ's decision on the application is final 16 days after DEQ's decision is made.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy of the air quality permit shall be made available for inspection by DEQ at the location of the source.
- G. Air Quality Operation Fees – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by MGGG may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.
- H. Duration of Permit – Construction or installation must begin, or contractual obligations entered into that would constitute substantial loss within 3 years of permit issuance and proceed with due diligence until the project is complete or the permit shall expire (ARM 17.8.762).

Montana Air Quality Permit (MAQP) Analysis  
Monte Grande Glacier Gathering, LLC.  
Cut Bank Field, Station 015  
MAQP #2737-09

I. Introduction/Process Description

Monte Grande Glacier Gathering, LLC (MGGG) - Cut Bank Field, Station 015 operates a compressor station and associated equipment, located in the SW  $\frac{1}{4}$  of the NW  $\frac{1}{4}$  of Section 4, Township 34 North, Range 5 West, Glacier County, Montana.

A. Permitted Equipment

The facility includes the following equipment:

- One 425 brake-horsepower (bhp) Caterpillar compressor engine
- One 175-thousand British thermal units per hour (MBtu/hour) Latoka dehydrator (reboiler)
- One 80 MBtu /hr Little Giant heater

B. Source Description

The complex has two primary purposes. The first purpose is to boost the field gas to the natural gas transmission system. This initial compression of the gas is accomplished with a 425-bhp Caterpillar compressor engine.

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 175-MBtu/hr Latoka dehydrator, also commonly called a reboiler or glycol unit.

The gas is treated with a glycol solution, which absorbs the water in the gas stream. The glycol is then heated to about 300 degrees Fahrenheit (°F) in order to drive off the water in the form of steam. Burning natural gas in the dehydrator reboiler generates the heat that is necessary for this.

C. Permit History

Montana Power Company - Cut Bank Field, Station 015 (Montana Power - Station 015) was issued **MAQP #2737-00** for the operation of their compressor station and associated equipment, located in the SW  $\frac{1}{4}$  of the NW  $\frac{1}{4}$  of Section 4, Township 34 North, Range 5 West, Glacier County near Cut Bank, Montana. The station was identified as the Cut Bank Field, Station 015. On April 13, 1993, MAQP #2737-00 became final.

A Best Available Control Technology (BACT) determination was required for the 360-bhp White Superior compressor engine, since it was not operating at the same location prior to March 16, 1979.

Based on the BACT analysis for the 360-bhp White Superior compressor engine, the Department of Environmental Quality (DEQ) determined that BACT for this source was proper operation of the engine to maintain compliance with the emission limitations in Section II.A.1 of the permit.

Montana Power - Station 015 requested a modification to MAQP #2737-00 so DEQ could revise the emission limitation units from grams per brake horsepower-hour (g/bhp-hr) to pounds/hour (lb/hr). Rather than limit the engines to a g/bhp-hr limit, an hourly emission limit allowed operational flexibility. The revision allowed Montana Power - Station 015 to account for varying parameters such as engine revolutions per minute (rpm), operating load (bhp), ambient air temperature, gas temperature, site, elevation, fuel gas quality, Air/Fuel Ratio (AFR), field gas conditions, etc.

In addition, to clarify nitrogen oxides (NO<sub>x</sub>) mass emission calculations, NO<sub>x</sub> emission limitations were identified as nitrogen dioxide (NO<sub>2</sub>). Furthermore, the July 30, 1993, request corrected the derating information to use a more accurate altitude derating curve. **MAQP #2737-01** replaced MAQP #2737-00. On February 18, 1994, MAQP #2737-01 became final.

As part of **MAQP #2737-02**, DEQ removed the testing requirements for the 360-bhp White Superior compressor engine. Removing the testing requirements for this engine was consistent with DEQ's testing guidance. The 360-bhp White Superior compressor engine was last tested and demonstrated compliance on October 7, 1997. The rule references were updated and the permitting language was changed to reflect the format used for writing permits at the time of permit issuance. MAQP #2737-02 replaced MAQP #2737-01. On November 15, 1998, MAQP #2737-02 became final.

The Montana Power Company requested a name change to the Montana Power Gas Company. The appropriate references in the permit were changed to reflect the name change. **MAQP #2737-03** replaced MAQP #2737-02. On March 14, 1999, MAQP #2737-03 became final.

On January 22, 2002, DEQ received a notice of corporate merger and name change from the Montana Power Gas Company to PanCanadian Energy Resources, Inc (PanCanadian). The letter notified DEQ that Montana Power Gas Company, Xenon, Inc., and Entech Gas Ventures, Inc. merged into North American Resources Company (NARCO) as of January 1, 2002. The letter also stated that at the same time, NARCO changed its corporate name to PanCanadian. In addition, on April 18, 2002, DEQ received a letter from PanCanadian that requested a name change from PanCanadian to EnCana Energy Resources, Inc. The current permit action transferred the permit from Montana Power Gas Company to EnCana Energy



Resources, Inc. (EnCana) and updated the permit with current permit language and rule references used by DEQ. **MAQP #2737-04** replaced MAQP #2737-03.

On June 5, 2003, DEQ received a letter from EnCana requesting DEQ change the corporate name on MAQP #2737-04 from EnCana to Encana Gathering Services (USA), Inc (EnCana Gathering). This permit action changed the corporate name from EnCana to EnCana Gathering and updated the permit to reflect current permit language and rule references used by DEQ. **MAQP #2737-05** replaced MAQP #2737-04.

On March 5, 2004, DEQ received a letter from MGGG requesting DEQ change the corporate name on MAQP #2737-05 from EnCana Gathering to MGGG. This permitting action changed the corporate name and updated the permit to reflect current permit language and rule references. **MAQP #2737-06** replaced MAQP #2737-05.

On October 16, 2012, DEQ received a de minimis request for the addition of a 80-MBtu/hr Little Giant Heater to the permit. **MAQP #2737-07** replaced MAQP #2737-06.

On October 10, 2017, the DEQ received an application to modify MAQP 2737-07 to remove one 360 bhp compressor engine and install one 425 bhp Caterpillar four-stroke rich-burn compressor engine equipped with an air-to-fuel-ratio (AFR) controller and Non-Selective Catalytic (NSCR) unit used for emissions control. The permit action updated the permit to reflect the new engine, which included emissions limitations derived from a Best Available Control Technology (BACT) determination and make the corresponding change to the emissions inventory. **MAQP #2737-08** replaced MAQP #2737-07.

#### D. Current Permit Action

On February 23, 2022, the Department of Environmental Quality, Air Quality Bureau (DEQ) received a request to transfer ownership of the MAQP for the Cut Bank Field, Station 025 from Omimex Canada, Ltd., to Monte Grande Glacier Gathering, LLC. The current permit action is an administrative amendment pursuant to the ARM 17.8.764 that transfers ownership of the MAQP, as requested. **MAQP #2737-09** replaces MAQP #2737-08.

#### E. Additional Information

Additional information, such as applicable rules and regulations, BACT/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the permit analysis associated with each change to the permit.

## II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM)

and are available, upon request, from DEQ.

Upon request, DEQ will provide references for the locations of complete copies of all applicable rule or regulation or copies where appropriate.

A. ARM 17.8, Subchapter 1 - General Provisions, including, but not limited to:

1. ARM 17.8.101 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. Any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of DEQ, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct tests, emission or ambient, for such periods of time as may be necessary using methods approved by DEQ.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by DEQ, any source, or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, et seq., Montana Code Annotated (MCA).

MGGG shall comply with all requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited to, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from DEQ upon request.

4. ARM 17.8.110 Malfunctions. DEQ must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner that a public nuisance is created.

B. ARM 17.8, Subchapter 2 - Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.204 Ambient Air Monitoring
2. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
3. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
4. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
5. ARM 17.8.213 Ambient Air Quality Standard for Ozone
6. ARM 17.8.214 Ambient Air Quality Standard for Hydrogen Sulfide

7. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
8. ARM 17.8.221 Ambient Air Quality Standard for Visibility
9. ARM 17.8.222 Ambient Air Quality Standard for Lead
10. ARM 17.8.223 Ambient Air Quality Standards for PM10

MGGG must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 - Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. This rule requires that no person may cause or authorize emissions to be discharged to an outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of less than 20% for all fugitive emissions sources and that reasonable precautions are taken to control emissions of airborne particulate. (2) Under this rule, MGGG shall not cause or authorize the use of any street, road, or parking lot without taking reasonable precautions to control emissions of airborne particulate matter.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow, or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions–Sulfur in Fuel. (5) Commencing July 1, 1971, no person shall burn any gaseous fuel, containing sulfur compounds, in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions. MGGG uses natural gas, which meets this limitation.
6. ARM 17.8.340 Standards of Performance for New Stationary Sources. The owner or operator of any stationary source or modification, as defined and applied in 40 Code of Federal Regulations (CFR) Part 60, New Source Performance Standards (NSPS), shall comply with the standards and provisions of 40 CFR Part 60.
  - a. 40 CFR 60, Subpart A – General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
  - b. The MGGG facility is not an NSPS affected source because it does not meet any of the definitions of a natural gas processing plant, as defined in 40 CFR Part 60, Subpart KKK, or any other subpart under 40 CFR Part 60, as the facility was constructed prior to January 20, 1984.

- c. 40 CFR 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. The provisions of this subpart are applicable to owners and operators of stationary spark ignition internal combustion engines (SI ICE) that commence construction after June 12, 2006, where the engines are less than 500 brake-horsepower (bhp) and are manufactured on or after July 1, 2008. For the purposes of this subpart, the date that construction commences is the date the engine is ordered. The SI ICE engine associated with MAQP #2737-09 is less than 500 bhp and manufactured in 2004. Based on the size and the manufacture date, this engine is not subject. However, should the engine undergo modification or reconstruction, as defined for this Subpart, later June 12, 2006, or MGGG replaces the engine with one manufactured on or after July 1, 2007, this Subpart would become applicable.
7. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR 63, shall comply with the requirements of 40 CFR 63, as listed below:
- a. 40 CFR 63, Subpart A – General Provisions apply to all equipment or facilities subject to a New Emissions Standard for Hazardous Air Pollutants (NESHAP) Subpart as listed below:
  - b. 40 CFR 63, Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities. Owners or operators of oil and natural gas production facilities, as defined and applied in 40 CFR Part 63 shall comply with the applicable provisions of 40 CFR 63, Subpart HH. In order for a natural gas production facility to be subject to 40 CFR 63, Subpart HH requirements, certain criteria must be met. First, the facility must be a major or area source of hazardous air pollutants (HAP) as determined according to paragraphs (a)(1)(i) through (a)(1)(iii) of 40 CFR 63, Subpart HH. Second, a facility must process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category or is delivered to a final end user. Third, the facility must also contain an affected source as specified in paragraphs (b)(1) or (b)(2) of 40 CFR 63, Subpart HH. Finally if the criteria are met, and the exemptions contained in paragraphs (e)(1) and (e)(2) of 40 CFR 63, Subpart HH do not apply, the facility is subject to the applicable provisions of 40 CFR 63, Subpart HH. Based on the information submitted by MGGG, the Cut Bank Field, Station 015 facility is subject to the provisions of 40 CFR 63, Subpart HH because the facility is an area source of HAPs and it contains a triethylene glycol dehydration unit, which is considered an affected source pursuant to paragraph (b)(2) of 40 CFR 63, Subpart HH.
  - c. 40 CFR 63, Subpart HHH – National Emission Standards for Hazardous Air Pollutants From Natural Gas Transmission and Storage Facilities. This subpart applies to owners and operators of natural gas transmission and

storage facilities that transport or store natural gas prior to entering the pipeline to a local distribution company or to a final end user (if there is no local distribution company), and that are major sources of hazardous air pollutant (HAP) emissions as determined using the maximum natural gas throughput as calculated in either paragraphs (a)(1) and (a)(2) or paragraphs (a)(2) and (a)(3) of 40 CFR 63, Subpart HHH. Second, a facility must contain an affected source (glycol dehydration unit) as defined in paragraph (b) of 40 CFR 63, Subpart HHH. Finally, if the first two criteria are met, and the exemptions contained in paragraph (f) of 40 CFR 63, Subpart HHH, do not apply, the facility is subject to the applicable provisions of 40 CFR 63, Subpart HHH. Based on the information submitted by MGGG, the Cut Bank Field Station 015 facility is not subject to the provisions of 40 CFR 63, Subpart HHH because the facility is not a major source of HAP.

- d. 40 CFR 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants For Stationary Reciprocating Internal Combustion Engines (RICE). The provisions of Subpart ZZZZ established national emission and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions, except RICE being tested at a stationary test cell/stand. This subpart also establishes requirements to demonstrate initial and continuous compliance established emission and operating limitations. As an area source of HAPs, the RICE operated under MAQP #2737-09 are potentially subject to this subpart.

D. ARM 17.8, Subchapter 5 - Air Quality Permit Application, Operation, and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. MGGG shall submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to DEQ. A permit fee is not required for the current permit action because the action is considered an administrative permit change.
2. ARM 17.8.505 Air Quality Operation Fees. An annual air quality operation fee must, as a condition of continued operation, be submitted to DEQ by each source of air contaminants holding an air quality permit, excluding an open burning permit, issued by DEQ. This operation fee is based on the actual or estimated amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, as described above, shall take place on a calendar-year basis. DEQ may insert into any final permit issued after the effective date of these rules such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions which pro-rate the required fee amount.

E. ARM 17.8, Subchapter 7 - Permit, Construction, and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this subchapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a person to obtain an air quality permit or permit alteration to construct, alter or use any air contaminant sources that have the Potential to Emit (PTE) greater than 25 tons per year of any pollutant. MGGG has a PTE greater than 25 tons per year (tpy) of NO<sub>x</sub>; therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that do not require a permit under the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration or use of a source. A permit application was not required for the current permit action because the permit change is considered an administrative amendment. (7) This rule requires that the applicant notify the public by means of legal publication in a newspaper of general circulation in the area affected by the application for a permit. An affidavit of publication of public notice was not required for the current permit action because the permit change is considered an administrative amendment.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by DEQ must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.
7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. A BACT analysis was not required for the current permit action because there are no new or modified sources permitted as a part of this action.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by DEQ at the location of the source.
9. ARM 17.8.756 Compliance with Other Statutes and Rules. This rule states that nothing in the permit shall be construed as relieving MGGG of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, et seq.

10. ARM 17.8.759 Review of Permit Applications. This rule describes DEQ's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified as provided in this subchapter, except that a permit issued prior to construction of a new or modified source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to DEQ.

F. 17.8, Subchapter 8 - Prevention of Significant Deterioration of Air Quality, including, but not limited to:

1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.
2. ARM 17.8.818 Review of Major Stationary Sources and Major Modification-- Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

This facility is not a major stationary source because it is not a listed source and does not have a PTE greater than 250 tons per year (tpy) (excluding fugitive emissions) of any air pollutant.

G. ARM 17.8, Subchapter 12 - Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any stationary source having:
  - a. PTE > 100 tpy of any pollutant.
  - b. PTE > 10 tpy of any one HAP, or PTE > 25 tpy of a combination of all HAPs, or lesser quantity as DEQ may establish by rule.
  - c. PTE > 70 tpy of PM<sub>10</sub> in a serious PM<sub>10</sub> nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program Applicability. Title V of the FCAA Amendments of 1990 requires that all sources, as defined in ARM 17.8.1204 (1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #2737-09 for MGGG, the following conclusions were made:
  - a. The facility's PTE is less than 100 tpy for all pollutants.
  - b. The facility's PTE is less than 10 tpy of any one HAP and less than 25 tpy of all HAPs.
  - c. This source is not located in a serious PM<sub>10</sub> nonattainment area.
  - b. This facility is subject to current NESHAP standard (40 CFR 63, Subpart ZZZZ) and is potentially subject to (40 CFR 63, Subpart HH).
  - d. This facility is potentially subject to NSPS standard 40 CFR 60, Subpart JJJJ.
  - e. This source is not a Title IV affected source.
  - f. This source is not a solid waste combustion unit.
  - g. This source is not an EPA designated Title V source.

Based on these facts, the DEQ determined that MGGG will be a minor source of emissions as defined under Title V.

### III. BACT Determination

A BACT determination is required for each new or altered source. MGGG shall install on the new or altered source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized. A BACT analysis is not required for the current permit action, because the change is considered an administrative amendment.



#### IV. Emission Inventory

	Ton/Year					
	PM	PM <sub>10</sub>	SO <sub>x</sub>	NO <sub>x</sub>	VOC	CO
425 Caterpillar Engine	0.00	0.00	1.31	8.21	4.10	8.21
Latoka Dehydrator	0.00	0.00	0.00	0.08	0.01	0.02
80 MBtu/hr Little Giant Heater	0.002	0.002	0.00	0.04	0.00	0.01
<b>Total</b>	<b>0.002</b>	<b>0.002</b>	<b>1.31</b>	<b>8.33</b>	<b>4.11</b>	<b>8.24</b>

#### 425 White Superior

Brake Horsepower: 425 bhp  
 Hours of operation: 8760 hr/yr

#### PM Emissions (Assume PM = PM10 = PM2.5)

Emission Factor: 0.00950 lb/MMBtu {AP-42 Table 3.2-3 (07/2000)}  
 Control Efficiency: 0.0%  
 Fuel Consumption: 0.023 MMScf/day (MAQP 2737-08 application)  
 Calculations: 0.023MMScf/day \* 1020 MMBtu/MMScf / 24 hrs = 0.0093 lb/hr  
 0.0093 lb/hr / 2000 lbs = 4.6e-06 ton/yr

#### NO<sub>x</sub> Emissions

Emission factor: 2.0 gram/bhp-hr {Based on BACT determination}  
 Calculations: 2.0 gram/bhp-hr \* 425 bhp \* 0.002205 lb/gram = 1.87 lb/hr  
 1.87 lb/hr \* 8760 hr/yr / 2000 = 8.21 ton/yr

#### VOC Emissions

Emission factor: 1.00 gram/bhp-hr {Based on BACT determination}  
 Calculations: 1.00 gram/bhp-hr \* 425 bhp \* 0.002205 lb/gram = 0.94 lb/hr  
 0.94lb/hr \* 8760 hr/yr / 2000 = 4.10 ton/yr

#### CO Emissions

Emission factor: 2.00 gram/bhp-hr {Based on BACT determination}  
 Calculations: 2.00 gram/bhp-hr \* 425 bhp \* 0.002205 lb/gram = 1.87 lb/hr  
 1.87 lb/hr \* 8760 hr/yr / 2000 = 8.21ton/yr

#### SO<sub>x</sub> Emissions

Emission factor: 0.000588 lb/MMBtu {AP-42, Table 3.2.3 (7/00)}  
 Max Process Rate: 518.5 MMBtu/hr  
 Calculations: 0.000588 lb/MMBtu \* 518.5 MMBtu/hr = 0.30 lb/hr  
 0.30 lb/hr \* 8760 hr/yr / 2000 = 1.31 ton/yr

#### Latoka Dehydrator

PM Emissions  
 Emission Factor: 5.00 lb/10<sup>6</sup> ft<sup>3</sup> {AP-42, 1.4-1}  
 Control Efficiency: 0.00%  
 Fuel Consumption: 1.53 10<sup>6</sup> ft<sup>3</sup>/yr {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 5 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.00 \text{ ton}/\text{yr}$

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

Emission Factor:  $5.00 \text{ lb}/10^6 \text{ ft}^3$  {AP-42, 1.4-1}

Control Efficiency: 0.00%

Fuel Consumption:  $1.53 * 10^6 \text{ ft}^3/\text{yr}$  {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 5 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.00 \text{ ton}/\text{yr}$

#### NO<sub>x</sub> Emissions

Emission Factor:  $100.00 \text{ lb}/10^6 \text{ ft}^3$  {AP-42, 1.4-1}

Control Efficiency: 0.00%

Fuel Consumption:  $1.53 * 10^6 \text{ ft}^3/\text{yr}$  {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 100 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.08 \text{ ton}/\text{yr}$

#### VOC Emissions

Emission Factor:  $8.00 \text{ lb}/10^6 \text{ ft}^3$  {AP-42, 1.4-1}

Control Efficiency: 0.00%

Fuel Consumption:  $1.53 * 10^6 \text{ ft}^3/\text{yr}$  {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 8 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.01 \text{ ton}/\text{yr}$

#### CO Emissions

Emission Factor:  $20.00 \text{ lb}/10^6 \text{ ft}^3$  {AP-42, 1.4-1}

Control Efficiency: 0.00%

Fuel Consumption:  $1.53 * 10^6 \text{ ft}^3/\text{yr}$  {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 20 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.02 \text{ ton}/\text{yr}$

#### SO<sub>x</sub> Emissions

Emission Factor:  $0.60 \text{ lb}/10^6 \text{ ft}^3$  {AP-42, 1.4-1}

Control Efficiency: 0.00%

Fuel Consumption:  $1.53 * 10^6 \text{ ft}^3/\text{yr}$  {Information from company}

Calculations:  $1.53 * 10^6 \text{ ft}^3/\text{yr} * 0.6 \text{ lb}/10^6 \text{ ft}^3 \text{ gas} * 0.0005 \text{ ton}/\text{lb} = 0.00 \text{ ton}/\text{yr}$

### **80 MBtu/hr Little Giant Heater (80 MBtu converted to 0.08 MMBtu for Emission Inventory calculations)**

Fuel Consumption: 0.08 MMBtu/hr {Information from Company}

Hours of operation: 8,760 hr/yr

#### PM Emissions

Emission Factor:  $7.6 \text{ lb}/\text{MMScf}$  {AP-42, Chapter 1, Table 1.4-2, 7/98}

Control Efficiency: 0.0%

Calculations:  $0.08 \text{ MMBtu}/\text{hr} * 0.001 \text{ MMScf}/\text{MMBtu} * 8,760 \text{ hr}/\text{yr} = 0.7008 \text{ MMScf}/\text{yr}$

$0.7008 \text{ MMScf}/\text{yr} * 7.6 \text{ lb}/\text{MMScf} * 0.0005 \text{ ton}/\text{lb} = 0.002 \text{ ton}/\text{yr}$

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

Emission Factor:  $7.6 \text{ lb}/\text{MMScf}$  {AP-42, Chapter 1, Table 1.4-2, 7/98}

Control Efficiency: 0.0%

Calculations:  $0.08 \text{ MMBtu}/\text{hr} * 0.001 \text{ MMScf}/\text{MMBtu} * 8,760 \text{ hr}/\text{yr} = 0.7008 \text{ MMScf}/\text{yr}$

$0.7008 \text{ MMScf}/\text{yr} * 7.6 \text{ lb}/\text{MMScf} * 0.0005 \text{ ton}/\text{lb} = 0.002 \text{ ton}/\text{yr}$

NO<sub>x</sub> Emissions

Emission Factor: 100 lb/MMScf {AP-42, Chapter 1, Table 1.4-1, 7/98}  
Control Efficiency: 0.0%  
Calculations:  $0.08 \text{ MMBtu/hr} * 0.001 \text{ MMScf/MMBtu} * 8,760 \text{ hr/yr} = 0.7008 \text{ MMScf/yr}$   
 $0.7008 \text{ MMScf/yr} * 100 \text{ lb/MMScf} * 0.0005 \text{ ton/lb} = 0.04 \text{ ton/yr}$

VOC Emissions

Emission Factor: 5.5 lb/MMScf {AP-42, Chapter 1, Table 1.4-2, 7/98}  
Control Efficiency: 0.0%  
Calculations:  $0.08 \text{ MMBtu/hr} * 0.001 \text{ MMScf/MMBtu} * 8,760 \text{ hr/yr} = 0.7008 \text{ MMScf/yr}$   
 $0.7008 \text{ MMScf/yr} * 5.5 \text{ lb/MMScf} * 0.0005 \text{ ton/lb} = 0.00 \text{ ton/yr}$

CO Emissions

Emission Factor: 40 lb/MMScf {AP-42, Chapter 1, Table 1.4-1, 7/98}  
Control Efficiency: 0.0%  
Calculations:  $0.08 \text{ MMBtu/hr} * 0.001 \text{ MMScf/MMBtu} * 8,760 \text{ hr/yr} = 0.7008 \text{ MMScf/yr}$   
 $0.7008 \text{ MMScf/yr} * 40 \text{ lb/MMScf} * 0.0005 \text{ ton/lb} = 0.01 \text{ ton/yr}$

SO<sub>2</sub> Emissions

Emission Factor: 0.6 lb/MMBtu {AP-42, Chapter 1, Table 1.4-2, 7/98}  
Control Efficiency: 0.0%  
Calculations:  $0.08 \text{ MMBtu/hr} * 0.001 \text{ MMScf/MMBtu} * 8,760 \text{ hr/yr} = 0.7008 \text{ MMScf/yr}$   
 $0.7008 \text{ MMScf/yr} * 0.6 \text{ lb/MMScf} * 0.0005 \text{ ton/lb} = 0.00 \text{ ton/yr}$

V. Existing Air Quality

MAQP #2737-09 allows the continued operation of a natural gas compressor station, known as the Cut Bank Field, Station 015 Compressor Station, located in the SW ¼ of the NW ¼ of Section 4, Township 34 North, Range 5 West, Glacier County, Montana. DEQ believes that the amount of controlled emissions generated by this project will not exceed any set ambient air quality standard.

VI. Ambient Air Impact Analysis

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

VII. Taking or Damaging Implication Analysis

As required by 2-10-101 through 105, MCA, DEQ conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

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, DEQ determined there are no taking or damaging implications associated with this permit action.

#### VIII. Environmental Assessment

An Environmental Assessment is not required for the current permitting action because the change is considered administrative.

Analysis Prepared By: John P. Proulx  
Date: March 2, 2022