

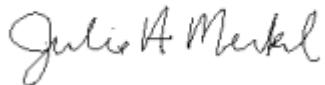
October 7, 2021

Patrick Montalban
Monte Grande Gathering, LLC
Cut Bank Field Station 001
P.O. Box 200
Cut Bank, MT 59427

Dear Mr. Montalban:

Montana Air Quality Permit #2768-10 is deemed final as of October 7, 2021, by the Department of Environmental Quality (Department). This permit is for a natural gas compressor station. All conditions of the Department's Decision remain the same. Enclosed is a copy of your permit with the final date indicated.

For the Department,



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



Troy Burrows
Air Quality Specialist
Air Quality Bureau
(406) 444-1452

JM:RP
Enclosure

MONTANA AIR QUALITY PERMIT

Issued To: Monte Grande Gathering, LLC
Cut Bank Field, Station 001
PO Box 200
Cut Bank, MT 59427

MAQP: #2768-10
Application Complete: 9/8/2021
Department's Decision Issued: 9/21/2021
Permit Final: 10/7/ 2021

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

SECTION I: Permitted Facilities

A. Plant Location

The Monte Grand natural gas compressor station is located in the NW $\frac{1}{4}$ of the NW $\frac{1}{4}$ of Section 11, Township 33 North, Range 5 West, in Glacier County, Montana. The facility is known as the Cut Bank Field, Station 001.

B. Current Permit Action

On September 8, 2021, the Department of Environmental Quality (Department) received a notice of a change of ownership for MAQP #2768-09 to change the name of the owner, the address, and the Responsible Official. The current permit action updates the permit to reflect the new owner, address, and Responsible Official.

SECTION II: Conditions and Limitations

A. Emission Limitations

1. Monte Grand 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 773-bhp. The engine shall be of a 4-stroke rich-burn engine class and shall be fired on pipeline quality natural gas (ARM 17.8.749 and ARM 17.8.752).
2. Monte Grand shall properly operate and maintain the compressor engine and associated control equipment. 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 _x):	1.5 g/bhp-hr
Carbon Monoxide (CO):	2.0 g/bhp-hr
Volatile Organic Carbon (VOC):	0.5 g/bhp-hr

4. Monte Grand shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
5. Monte Grand 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 (ARM 17.8.308).
6. Monte Grand shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.5 (ARM 17.8.749).
7. Monte Grand shall comply with any applicable standards and limitations, reporting, recordkeeping and notification requirements contained in 40 CFR 63 Subpart HH *National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities* and 40 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_x 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. 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 the Department, to demonstrate compliance with the NO_x 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 conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
3. The Department may require further testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. Monte Grand shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request.

Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. Monte Grand shall notify the Department of any construction or improvement project conducted, pursuant to ARM 17.8.745, that would include ***the addition of a new emissions 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 the Department, in writing, 10 days prior to startup 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(l)(d) (ARM 17.8.745).
3. All records compiled in accordance with this permit must be maintained by Monte Grand 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 Department, and must be submitted to the Department upon request (ARM 17.8.749).

D. Notification

1. Monte Grand shall provide the Department 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. Monte Grand shall provide the Department 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 – Monte Grand shall allow the Department'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 system (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 the terms, conditions, and matters stated herein shall be deemed accepted if Monte Grand fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Monte Grand 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 action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders its decision, upon affidavit setting forth the grounds therefor, 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 the Department’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 the Department’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, the Department’s decision on the application is final 16 days after the Department’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 the Department at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, failure to pay the annual operation fee by Monte Grand 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 Grand Gathering, LLC
Cut Bank Field, Station 001
MAQP #2768-10

I. Introduction/Process Description

A. Permitted Equipment

Monte Grand Gathering, LLC (Monte Grand) operates a compressor station and associated equipment located in the NW ¼ of the NW ¼ of Section 11, Township 33 North, Range 5 West, in Glacier County, Montana. The facility is known as Cut Bank Field, Station 001 and includes the following equipment:

- One 773-brake horsepower (bhp) four-stroke rich-burn engine, equipped with air-to-fuel ratio control (AFR) and non-selective catalytic reduction (NSCR) unit
- One BS&B triethylene glycol dehydration unit with associated 250-thousand British thermal units per hour (MBtu)/(hr) reboiler
- One 120-MBtu/hr Hotomatic Heater

B. Source Description

The first compressor engine was installed at the Cut Bank Field, Station 001 in 1983. The complex has two primary purposes. The first purpose is to pump the field gas up to the required pressure in the natural gas transmission system. Compression of the gas is accomplished using the compressor described above. An engine heater provides the heat to the various station facilities.

The second purpose of the complex is to dry the gas as it is being processed. The gas contains some moisture, which must be removed from the system prior to being sent into the transmission system. The moisture is removed with a triethylene glycol-based dehydrator.

The gas is treated with a glycol solution, which absorbs the water in the gas stream. The glycol solution is then heated to about 300 degrees Fahrenheit (° F) to drive off the water and return the glycol. The heat necessary for this activity is generated by burning natural gas in the dehydrator reboiler. The dehydrator has a heat input rating of approximately 250 MBtu/hr. The reboiler is small by industrial standards, having a size approximately equivalent to a typical natural gas-fired small office heating system.

C. Permit History

Montana Power Company was issued **MAQP #2768-00** on June 22, 1993, for the operation of their compressor station and associated equipment located in NW ¼ of the NW ¼ of Section 11, Township 33 North, Range 5 West, in Glacier County near Cut Bank, Montana. The station was identified as the Cut Bank Field, Station 001.

A Best Available Control Technology (BACT) determination was required for the 600-horsepower (hp) White Superior 6G825/W62 compressor engine since it was not operating at the same location prior to March 16, 1979. Based on the BACT analysis for the 600-hp White Superior compressor engine, the Department of Environmental Quality (Department) determined that BACT required the installation and operation of a NSCR unit capable of meeting the limitations in Section II.A.1. of MAQP #2768-00. The BS&B 250-MBtu/hour dehydrator (reboiler) and the 120-MBtu/hour Hotomatic Heater at the Cut Bank Field, Station 001, are minor sources. Based on previous determinations, BACT for these sources was determined to be no control.

As part of **MAQP #2768-01**, the emission limitations were changed from gram per brake horse power-hour (g/bhp-hr) to pounds per hour (lb/hr). This change provided operational flexibility 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, AFR, field gas conditions, etc. Also, to clarify nitrogen oxides (NO_x) mass emission calculations, NO_x emission limitations were identified as nitrogen dioxide (NO₂). MAQP #2768-01 replaced MAQP #2768-00. On March 7, 1994, MAQP #2768-01 became final.

MAQP #2768-02 consisted of a name change from Montana Power Company to Montana Power Gas Company. The appropriate references in the permit were changed to reflect the name change. In addition, the permit format was updated. MAQP #2768-02 replaced MAQP #2768-01. On August 8, 1999, MAQP #2768-02 became final.

MAQP #2768-03 was needed to properly identify the compressor engines at the Montana Power Gas Company - Station 001 facility. Section II.A.1 of MAQP #2768-02 inadvertently identified a 360-hp White Superior engine instead of a 600-bhp White Superior engine. However, the permit analysis and the emission inventory referenced the correct 600-hp engine. Section II.A.1 was changed to identify the correct engine and to update the permit format. MAQP #2768-03 replaced MAQP #2768-02. On May 23, 2001, MAQP #2768-03 became final.

On January 22, 2002, the Department received a notice of corporate merger and name change from PanCanadian Energy Resources, Inc. (PanCanadian). The letter also notified the Department that Montana Power Gas Company, Xeno, 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, the Department received a letter from PanCanadian requesting a name change from PanCanadian to EnCana Energy Resources, Inc. (Encana). The permit action transferred the permit from Montana Power Gas Company to EnCana and updated the permit with current permit language and rule references used by the Department. **MAQP #2768-04** replaced MAQP #2768-03. On August 22, 2002, MAQP #2768-04 became final.

On April 30, 2003, the Department received a letter from EnCana requesting that the Department add testing requirements, which were inadvertently removed during the last permitting action (MAQP #2768-04), back into the permit. This permitting action added the testing requirements back into the permit and updated the permit to reflect current permit language and rule references used by the Department. **MAQP #2768-05** replaced MAQP #2768-04. On May 31, 2003, MAQP #2768-05 became final.

On June 5, 2003, the Department received a letter from EnCana requesting that the Department change the corporate name on MAQP #2768-05 from EnCana Energy Resources, Inc. to EnCana Gathering Services (USA) Inc. This permit action changed the corporate name on MAQP #2768-05 from EnCana Energy Resources, Inc. to EnCana Gathering Services (USA) Inc. **MAQP #2768-06** replaced MAQP #2768-05. MAQP #2768-06 became final on September 5, 2003.

On March 5, 2004, the Department received a letter from Monte Grand requesting that the Department change the corporate name on MAQP #2768-06 from EnCana Gathering Services (USA), Inc. to Monte Grand. The permitting action changed the corporate name on MAQP #2768-06. **MAQP #2768-07** replaced MAQP #2768-06.

On February 25, 2010, the Department received an application from Aspen Consulting and Engineering, Inc., on behalf of Monte Grand, to replace the currently installed 600-bhp compressor engine with a different 600-bhp engine. The Department received an affidavit of publication of public notice on March 11, 2010, completing the application. The permit action updated the permit to reflect the new engine, which included new emissions limitations derived from a BACT determination and made the corresponding change to the emissions inventory. The action also updated the emissions inventory to include the volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions from the triethylene glycol dehydration unit. **MAQP #2768-08** replaced MAQP #2768-07.

On October 10, 2017, the Department of Environmental Quality (Department) received an application to modify MAQP 2768-08 to remove one 600 brake-horsepower (bhp) compressor engine and install one 773 bhp Waukesha compressor engine utilizing an air-to-fuel-ratio (AFR) controller and Non-Selective Catalytic (NSCR) unit used for emissions control. This permit action updated the permit to reflect the new engine, which included new emissions limitations derived from a Best Available Control Technology (BACT) determination, and made the corresponding change to the emissions inventory. **MAQP #2768-09** replaced MAQP #2768-08.

D. Current Permit Action

On September 8, 2021, the Department received a notice of new ownership, changing from Omimex Canada, Ltd. To Monte Grand Gathering, LLC. **MAQP #2768-10** replaces MAQP #2768-09.

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 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 the Department. Upon request, the Department will provide

references for the location of complete copies of all applicable rules and regulations 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 includes a list of applicable definitions used in this chapter, 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 the Department, 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 the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, 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).

Monte Grand shall comply with the 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 the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department 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 that, without resulting in reduction of 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 as to create a public nuisance.

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 Standard for PM₁₀

Monte Grand 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 into the 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 emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Monte Grand 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. (4) Commencing July 1, 1972, no person shall burn liquid or solid fuels containing sulfur in excess of 1 pound of sulfur per million Btu fired. (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. Monte Grand will burn pipeline quality natural gas, which will meet this limitation.
6. ARM 17.8.324 Hydrocarbon Emissions--Petroleum Products. (3) No person shall load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device as described in (1) of this rule.
7. ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR Part 60, Standards of Performance for New Stationary Sources (NSPS).
 - a. 40 CFR 60, Subpart A - General Provisions apply to all equipment or facilities subject to an NSPS Subpart as listed below:
 - b. 40 CFR 60, Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines. Owners and operators of stationary spark ignition internal combustion engines (SI ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured on or after July 1, 2007, for

engines with a maximum engine power greater than or equal to 500 HP are subject to this Subpart. The currently permitted engine was manufactured in 1998, before the July 1, 2007 applicability date. However, should the engine undergo modification or reconstruction as defined for this Subpart, or Monte Grand replaces the engine with one manufactured on or after July 1, 2007, this Subpart would become applicable.

8. ARM 17.8.342 Emission Standards for Hazardous Air Pollutants for Source Categories. The source, as defined and applied in 40 CFR Part 63, shall comply with the requirements of 40 CFR Part 63, as listed below:
 - a. 40 CFR 63, Subpart A - General Provisions apply to all equipment or facilities subject to a 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 conditions of 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 that is determined to be major for HAP must also either process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer, or 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) through (b)(2) of 40 CFR 63, Subpart HH. Finally, if the first three 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 Monte Grand, the Cut Bank Field Station 001 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. Owners or operators of natural gas transmission or storage facilities, as defined and applied in 40 CFR Part 63, shall comply with the standards and provisions of 40 CFR 63, Subpart HHH. In order for a natural gas transmission and storage facility to be subject to 40 CFR 63, Subpart HHH requirements, certain criteria must be met. First, the facility must transport or store natural gas prior to the gas entering the pipeline to a local distribution company or to a final end user if there is no local distribution company. In addition, the facility must be a major source of HAP 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 Monte Grand, the Cut Bank Field Station 001 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 Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE). A stationary RICE at a major or area source of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand, is subject to this subpart. An area source of HAP emissions is a source that is not a major source. Therefore, Monte Grand's compressor engine will be subject to this subpart as an area source. For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if construction or reconstruction of the stationary RICE is commenced before June 12, 2006. A stationary RICE located at an area source of HAP emissions is new if construction of the stationary RICE is commenced on or after June 12, 2006. This subpart is applicable to the source as the engine meets the definition of constructed after June 12, 2006.
- 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. This rule requires that an applicant 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 the Department. A permit fee is not required for the current permit action because the permit 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 the Department by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.
- 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 chapter, 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 modification to construct, modify, or use any air contaminant sources that have the potential to emit (PTE) greater than 25

tons per year of any pollutant. Monte Grand has a PTE greater than 25 tons per year of NO_x and carbon monoxide (CO); 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, modification, or use of a source. A permit application was not required for the current permit action because the permit change is considered an administrative permit change. (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 permit change.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department 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. The required BACT analysis is included in Section III of this permit analysis.
8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Monte Grand 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 the Department'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 the Department.

F. ARM 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 Modifications--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 this facility is not a listed source and the facility's PTE is below 250 tons per year of any pollutant (excluding fugitive emissions).

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 source having:
 - a. PTE > 100 tons/year of any pollutant;
 - b. PTE > 10 tons/year of any one hazardous air pollutant (HAP), PTE > 25 tons/year of a combination of all HAP, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tons/year of particulate matter with an aerodynamic diameter of 10 microns or less (PM₁₀) in a serious PM₁₀ nonattainment area.

2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) 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 MAQP #2768-10 for Monte Grand, the following conclusions were made:

- a. The facility's PTE is less than 100 tons/year for any pollutant.
- b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for all HAP.
- c. This source is not located in a serious PM₁₀ nonattainment area.
- d. This facility is not subject to any current NSPS.
- e. This facility is subject to area source provisions of current NESHAP standards (40 CFR 63, Subpart HH and 40 CFR 63, Subpart ZZZZ).
- f. This source is not a Title IV affected source.
- g. This source is not a solid waste combustion unit.
- h. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that Monte Grand will be a minor source of emissions as defined under Title V. However, if minor sources subject to NSPS are required to obtain a Title V Operating Permit, Monte Grand will be required to obtain a Title V Operating Permit.

III. BACT Determination

A BACT determination is required for each new or modified source. Monte Grand shall install on the new or modified source the maximum air pollution control capability, which is technically practicable and economically feasible, except that BACT shall be utilized.

A BACT analysis was not required for the current permit action because the current permit action is considered an administrative permit action.

IV. Emission Inventory*

Monte Grand Gathering, LLC Cut Bank Field Station 001 Potential to Emit in Tons Per Year							
Source	NOx	CO	VOC	SOx	PM ₁₀	PM _{2.5}	HAP
773-bhp White Superior Engine	11.20	14.93	3.73	0.006	0.19	0.19	0.12
Glycol Dehydration Reboiler	0.11	0.09	0.01	0.00	0.01	0.01	0.00
Glycol Dehydration Vent	N/A	N/A	20.12	N/A	ND	ND	11.04
Hotomatic Heater	0.05	0.04	0.00	0.00	0.00	0.00	0.00

TOTAL:	11.31	15.02	23.86	0.006	0.2	0.2	11.16
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Some emissions may show zero due to rounding. See calculations following.

*Emissions Inventory and Calculation Notes:

PM₁₀ = particulate matter with an aerodynamic diameter of 10 microns or less
 PM_{2.5} = particulate matter with an aerodynamic diameter of 2.5 microns or less
 HAP = hazardous air pollutant

SO_X = oxides of sulfur
 SO₂ = sulfur dioxide
 bhp = brake horsepower
 Btu = british thermal unit
 hr = hour
 lb = pound
 MM denotes 10⁶, M denotes 10³

N/A = not applicable
 ND = no data available
 scf = standard cubic feet
 VMT = vehicle miles traveled
 CH₂O = formaldehyde

773-bhp White Superior Engine

Rated bhp:	773 bhp	(MAQP #2768-10 Application)
Hours of Operation:	8760 hr/yr	
Maximum Combustion Rate	42 Mscf/day	(MAQP #2768-10 Application)
Heating value	1252 Btu/scf	(MAQP #2768-10 Application)

NO_x Emissions - controlled

Emissions Factor:	1.5 g/bhp-hr	(BACT - MAQP 2768-10)
Calculations:	1.5 g/bhp-hr * 773 bhp * 8760 hr/yr * 0.002205 lb/g =	22396.97 lb/yr
		11.19 ton/yr

CO Emissions - controlled

Emissions Factor:	2.0 g/bhp-hr	(BACT - MAQP 2768-10)
Calculations:	2 g/bhp-hr * 773 bhp * 8760 hr/yr * 0.002205 lb/g =	29862.23 lb/yr
		14.93 ton/yr

VOC Emissions - controlled

Emissions Factor:	0.5 g/bhp-hr	(BACT - MAQP 2768-10)
Calculations:	0.5 g/bhp-hr * 773 bhp * 8760 hr/yr * 0.002205 lb/g =	7465.58 lb/yr
		3.73 ton/yr

HAP (Formaldehyde) Emissions

Emissions Factor:	0.0205 lb/MMBtu	(AP-42 Table 3.2-3 (7/2000))
Max Fuel Rate:	42 MScf/day	(MAQP #2768-10 Application)
Calculations:	0.0205 lb/MMBtu * 1252 Btu/scf * 0.042 scf/d * 365 d/yr	393.46 lb/yr
		0.12 ton/yr

PM₁₀ and PM_{2.5} Emissions

Emissions Factor:	0.01941 lb/MMBtu	(AP-42 Table 3.2-3 (07/2000) - condensable + filterable)
Max Fuel Rate:	42 Mscf/day	(MAQP #2768-10 Application)
Calculations:	0.01941 lb/MMBtu * 1252 Btu/scf * 0.042 scf/d * 365 d/yr =	372.54 lb/yr
		0.19 ton/yr

SO₂ Emissions

Emissions Factor:	0.000588 lb/MMBtu	(AP-42 Table 3.2-3 (07/2000))
Max Fuel Rate:	42 Mscf/day	(MAQP #2768-10 Application)

Calculations:	0.000588lb/MMBtu * 1252 Btu/scf * 0.042 scf/d * 365 d/yr =	11.29 lb/yr
		0.006 ton/yr

Glycol Dehydration Reboiler

Max Heat Input:	0.25 MMBtu/hr
Hours of Operation:	8760 hr/yr

PM₁₀ and PM_{2.5} Emissions:

Emissions Factor:	7.6 lb/MMSCF (AP-42 Table 1.4-2 (07/1998))
Calculations:	7.6lb/MMSCF/1020*0.25MMBtu/hr =
	0.001863 lb/hr
	0.01 ton/yr

SO_x Emissions:

Emissions Factor:	0.6 lb/MMSCF (AP-42 Table 1.4-2 (07/1998))
Calculations:	0.6lb/MMSCF/1020*0.25MMBtu/hr =
	0.000147 lb/hr
	0.001 ton/yr

VOC Emissions:

Emissions Factor:	5.5 lb/MMSCF (AP-42 Table 1.4-2 (07/1998))
Calculations:	5.5lb/MMSCF/1020*0.25MMBtu/hr =
	0.001348 lb/hr
	0.01 ton/yr

CO Emissions:

Emissions Factor:	84 lb/MMSCF (AP-42 Table 1.4-1 (07/1998))
Calculations:	84lb/MMSCF/1020*0.25MMBtu/hr =
	0.020588 lb/hr
	0.09 ton/yr

NO_x Emissions:

Emissions Factor:	100 lb/MMSCF (AP-42 Table 1.4-1 (07/1998))
Calculations:	100lb/MMSCF/1020*0.25MMBtu/hr =
	0.02451 lb/hr
	0.11 ton/yr

HAP Emissions:

Emissions Factor:	1.887958 lb/MMSCF (AP-42 Table 1.4-3 and 1.4-4, 07/1998)
Calculations:	1.887958lb/MMSCF/1020*0.25MMBtu/hr =
	0.000463 lb/hr
	0.00203 ton/yr

Hotomatic Heater

Max Heat Input:	0.12 MMBtu/hr
Hours of Operation:	8760 hr/yr

PM₁₀ and PM_{2.5} Emissions:

Emissions Factor:	7.6 lb/MMSCF (AP-42 Table 1.4-2
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Calculations:	7.6lb/MMSCF/1020*0.12MMBtu/hr=	(07/1998))	0.000894 lb/hr
			0.00 ton/yr

SO_x Emissions:

Emissions Factor:	0.6 lb/MMSCF	(AP-42 Table 1.4-2 (07/1998))
Calculations:	0.6lb/MMSCF/1020*0.12MMBtu/hr=	7.06E-05 lb/hr
		0.00 ton/yr

VOC Emissions:

Emissions Factor:	5.5 lb/MMSCF	(AP-42 Table 1.4-2 (07/1998))
Calculations:	5.5lb/MMSCF/1020*0.12MMBtu/hr=	0.000647 lb/hr
		0.00 ton/yr

CO Emissions:

Emissions Factor:	84 lb/MMSCF	
Calculations:	84lb/MMSCF/1020*0.12MMBtu/hr=	0.009882 lb/hr
		0.04 ton/yr

NO_x Emissions:

Emissions Factor:	100 lb/MMSCF	
Calculations:	100lb/MMSCF/1020*0.12MMBtu/hr=	0.011765 lb/hr
		0.05 ton/yr

HAP Emissions:

Emissions Factor:	1.887958 lb/MMSCF	(AP-42 Table 1.4-3 and 1.4-4, 07/1998)
Calculations:	1.8879582lb/MMSCF/1020*0.12MMBtu/hr=	0.000222 lb/hr
		0.00097 ton/yr

Dehydration VOC and HAP Emissions:

A description of sample point, the sample analyses, and the GlyCalc input and emissions summary reports are on file with the application.

V. Existing Air Quality

The area in which the compressor engine is to be located is currently designated as attainment/unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants.

VI. Air Quality Impacts

The Department determined that there will be no impacts from this permitting action because this permitting action is considered an administrative action. Therefore, the Department believes this action will not cause or contribute to a violation of any ambient air quality standard.

VII. Ambient Air Impact Analysis

Based on the information provided and the conditions established in MAQP #2786-10, the Department determined that there will be no impacts from this permitting action. The Department believes it will not cause or contribute to a violation of any ambient air quality standard.

VIII. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted the following private property taking and damaging assessment.

YES	NO	
XX		1. Does the action pertain to land or water management or environmental regulation affecting private real property or water rights?
	XX	2. Does the action result in either a permanent or indefinite physical occupation of private property?
	XX	3. Does the action deny a fundamental attribute of ownership? (ex.: right to exclude others, disposal of property)
	XX	4. Does the action deprive the owner of all economically viable uses of the property?
	XX	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?
	XX	6. Does the action have a severe impact on the value of the property? (consider economic impact, investment-backed expectations, character of government action)
	XX	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?
	XX	7a. Is the impact of government action direct, peculiar, and significant?
	XX	7b. Has government action resulted in the property becoming practically inaccessible, waterlogged or flooded?
	XX	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?
	XX	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.

IX. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an environmental assessment is not required.

Analysis Prepared by: Troy Burrows
Date: September 14, 2021