Schwartz, Colin

From: Schwartz, Colin
Sent: Thursday, August 31, 2017 10:42 AM
To: 'Marc.Dempewolf@wbienergy.com'
Cc: 'Linn, Jill'; connie.howe@crow-nsn.gov; Smith, Claudia; Fallon, Gail; 'Norgaard, Aaron'
Subject: Final Part 71 Permit for Hardin Compressor Station
Attachments: Final TV Permit V-C-000001-2013_00 WBI Hardin CS.pdf; Hardin CS Cover Letter and RTC.pdf

Mr. Dempewolf,

I have attached the final requested permit and the accompanying response to comments document for the WBI Energy Transmission, Inc. Hardin Compressor Station issued pursuant to the Title V Operating Permit Program at 40 CFR Part 71 (Part 71). We will also be posting the final Part 71 permit and response to comments in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §71.11(i), the permit will be effective 30 days after the date of this notice, on September 30, 2017. Within 30 days after a final permit decision has been issued, any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

If you have any questions or concerns regarding this final permit action please contact me.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Schwartz, Colin
Sent: Thursday, August 31, 2017 10:42 AM
Subject: Notice of Issuance of Renewed Title V Operating Permit on the Crow Indian Reservation

This is to notify you that the EPA has issued a final renewed Clean Air Act (CAA) Title V operating permit for the WBI Energy Transmission, Inc. Hardin Compressor Station pursuant to the Title V Operating Permit Program at 40 CFR Part 71 (Part 71). The final Part 71 permit and response to comments can be accessed in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8.

In accordance with the regulations at §71.11(i), the permit will be effective 30 days after the date of this notice, on September 30, 2017. Within 30 days after a final permit decision has been issued, any person who filed comments on the draft permit or participated in the public hearing may petition the Environmental Appeals Board (EAB) to review any condition of the permit decision. The 30-day period within which a person may request review under this section begins when we have fulfilled the notice requirements for the final permit decision. Motions to reconsider a final order by the EAB must be filed within 10 days after service of the final order. A petition to the EAB is under Section 307(b) of the CAA, a prerequisite to seeking judicial review of the final agency action. For purposes of judicial review, final agency action occurs when we issue or deny a final permit and agency review procedures are exhausted.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

WBI ENERGY TRANSMISSION
An MDU Resources Group company

WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

July 13, 2017

Colin Schwartz
United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, CO 80202

RE: WBI Energy Transmission, Inc.
Hardin Compressor Station Operating Permit No. V-C-000001-2013.00
Title V Operating Permit Renewal Comments

Mr. Schwartz,

WBI Energy Transmission, Inc. (WBI Energy) is in receipt of the draft Operating Permit V-C-000001-2013.00, regarding the Hardin Compressor Station. WBI Energy respectfully submits comments regarding the following cited permit sections and conditions:

Draft Permit

Title Page

- Change the name from Williston Basin Interstate Pipeline Company to WBI Energy Transmission, Inc.

Page i

- Change the name from Williston Basin Interstate Pipeline Company to WBI Energy Transmission, Inc.

Page 3, Section I.A

- Change the name from Williston Basin Interstate Pipeline Company to WBI Energy Transmission, Inc.

Page 4, Section I.A, Table 3-Insignificant units

- Per Chief Compressor Operator, the following heaters have been removed since the initial application submittal:
  - 75,000 Btu/hr auxiliary building heater
  - 70,000 Btu/hr shop heater
  - 40,000 Btu/hr domestic water heater
- Per Chief Compressor Operator, the following tanks have been removed since the initial application submittal:
  - 3200 Gallon Ethylene Glycol/Water Storage tank
  - 1200 Gallon Ethylene Glycol tank
  - 500 Gallon Methanol tank

- Per Chief Compressor Operator, the following tanks exist at the station that were not listed in the application:
    - 4 – 200 Gallon New Oil Tanks

Page 6, Section II.D.3.a, Continuous Compliance Requirements

- EPA references 40 CFR 63.6605(c) which doesn't exist

Statement of Basis

Title Page

- Change company name to WBI Energy Transmission, Inc.
- Remove the phrase "subsidiary of WBI Holdings, Inc."
- Change Station mailing address to:
    - 2010 Montana Avenue
      Glendive, MT 59330
- Change Facility Contact to:
    - Jill Linn
      Environmental Manager
      WBI Energy Transmission, Inc.
      2010 Montana Avenue
      Glendive, MT 59330
      (406) 359-7332
- Change Responsible Official to:
    - Marc Dempewolf

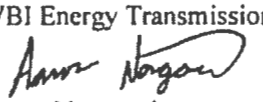
Page 2, Section D, Emission Points

- Per Chief Compressor Operator, the following heaters have been removed since initial application submittal:
    - 75,000 Btu/hr auxiliary building heater
    - 70,000 Btu/hr shop heater
    - 40,000 Btu/hr domestic water heater
- Per Chief Compressor Operator, the following tanks have been removed since the initial application submittal:
    - 3200 Gallon Ethylene Glycol/Water Storage tank
    - 1200 Gallon Ethylene Glycol tank
    - 500 Gallon Methanol tank
- Per Chief Compressor Operator, the following tanks exist at the station that were not listed in the application:
    - 4 – 200 Gallon New Oil Tanks

WBI Energy appreciates the opportunity to review and comment on this draft permit. Please notify me if you have any questions: (406) 359-7356 or aaron.norgaard@wbienergy.com.

Sincerely,

WBI Energy Transmission, Inc.



Aaron Norgaard
Environmental Affairs Department

Public Notice: Request For Comments

Draft Air Quality Permit to Operate for Federal Clean Air Act Title V to Control Air Pollutant Emissions from Williston Basin Interstate Energy Transmission, Inc. Hardin Compressor Station on the Crow Indian Reservation

Public notice issued:
June 14, 2017

Written comments due:

5 p.m., July 14, 2017

Where is the facility located?

Williston Basin Interstate Energy Transmission, Inc.
Hardin Compressor Station:
Crow Indian Reservation
Big Horn County, Montana
SW1/4, SE 1/4 Sec. 17, Township 1 South Range 34 East
Latitude: 45.73887" N
Longitude: -107.544" W

What is being proposed?

The EPA proposes to renew a Clean Air Act (CAA), Title V Permit to Operate in accordance with 40 Code of Federal Register, Part 71, for the Hardin Compressor Station on Indian country lands within the Crow Indian Reservation.

EPA issues CAA Title V operating permits in Indian country where EPA has not approved a tribe to implement the Title V operating permit program. The Crow Indian Tribe does not have an approved Title V operating permit program.

Air pollutant emissions come from equipment operating at the compressor station. The draft operating permit includes all CAA control requirements that apply to the compressor station and associated equipment emitting air pollutants .

Permit number:
V-C-000001-2013.00

How can I review documents?

You can review the draft CAA Title V Operating Permit, the application, and Statement of Basis at:

Dawson County Clerk Office
207 West Bell St,
Glendive, MT 59330

Crow Indian Reservation
P.O. Box 159
Crow Agency, MT 59022

U.S. EPA Region 8
Air Program Office (8P-AR)
1595 Wynkoop St.
Denver, CO 80202
Phone: 303-312-6043

All documents will be available for review at the U.S. EPA Region 8 office Monday through Friday from 8:00 am to 4:00 pm (excluding Federal holidays).

Electronic copies of the draft Title V permit, Statement of Basis and all supporting materials may also be viewed at: http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8

What are EPA's responsibilities?

The U.S. EPA Region 8 Air Program is the regulatory agency that helps protect and preserve air quality on the Crow Indian Reservation.

One way the EPA does this is by issuing CAA Title V operating permits for major air emission sources that require air pollutant emissions control and monitoring. The purpose of this notice is to invite you to submit written comments on this proposed permit through the process detailed in this notice.

What happens next?

The EPA will review and consider all comments received during the comment period.

Following this review, the EPA may issue the permit as drafted, issue the permits with revisions, or deny the permit.

Public Comment Period:
The EPA will accept written comments on this draft Title V Operating Permit beginning:

June 14, 2017
through
5 p.m. July 14, 2017.

Where can I send written comments?

The EPA accepts comments by mail and e-mail.

How can I make comments by e-mail?

To make comments via e-mail, click on the name of the contact person at the website below.

U.S. EPA
Region 8 Air Program
Mail Code 8P-AR
Tribal Permit Program
1595 Wynkoop Street
Denver CO 80202
Phone: 800.227.8917

http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
http://www.epa.gov/region8

MAY 26 2017

Ref: 8P-AR

Scott A. Fradenburgh
Director of Pipeline Operations
Williston Basin Interstate Energy Transmission, Inc.
2010 Montana Avenue
Glendive, Montana 59330

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Re: Draft Part 71 Operating Permit, Permit #V-C-000001-2013.00, Williston Basin Interstate Energy Transmission, Inc., Hardin Compressor Station

Dear Mr. Fradenburgh:

The Environmental Protection Agency, Region 8, has completed its review of Williston Basin Interstate Energy Transmission, Inc.'s (WBI's) application for the Hardin Compressor Station to obtain a renewed Clean Air Act Title V operating permit pursuant to the Title V Operating Permit Program at 40 CFR part 71 (Part 71). The EPA received the application on April 25, 2013.

Enclosed are the draft permit and the corresponding Statement of Basis. The regulations at 40 CFR 71.11(d) require that an applicant, the public and affected states (as defined in 40 CFR 71.2) have the opportunity to submit written comments on any draft Part 71 operating permit. All written comments submitted within 30 calendar days after the public notice is published will be considered by the agency in making its final permit decision. Enclosed is a copy of the public notice which will be published on the EPA's website located at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8, on June 14, 2017. The public comment period will end at 5:00 p.m. MDT on July 14, 2017.

The conditions contained in the permit will become effective and enforceable by the agency if the permit is issued final. If you are unable to accept any term or condition of the draft permit, please submit your written comments, along with the reason(s) for non-acceptance to:

Part 71 Permitting Lead
U.S. EPA, Region 8
Air Program (8P-AR)
1595 Wynkoop Street
Denver, Colorado 80202

If you have any questions concerning the enclosed draft permit or Statement of Basis, please contact Colin Schwartz of my staff at (303) 312-6043.

Sincerely,

Scott Jackson
Acting Director
Air Program

Enclosures (3)

cc: Charlene Alden, Environmental Director, Crow Indian Tribe

United States Environmental Protection Agency
Region 8
Air Program
1595 Wynkoop Street
Denver, Colorado 80202

Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

In accordance with the provisions of Title V of the Clean Air Act (CAA) and the Title V Operating Permit Program at 40 CFR part 71 (Part 71) and applicable rules and regulations,

Williston Basin Interstate Pipeline Company
Hardin Compressor Station

is authorized to operate air emission units and to conduct other air pollutant emitting activities in accordance with the permit conditions listed in this permit.

This source is authorized to operate at the following location:

Crow Indian Reservation
SW ¼ , SE ¼ of Section 17, Township 1 South, Range 34 East, Big Horn County, Montana

Terms not otherwise defined in this permit have the meaning assigned to them in the referenced regulations. All terms and conditions of the permit are enforceable by the EPA and citizens under the CAA.

Scott Jackson, Acting Director
Air Program
U.S. EPA Region 8

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Air Pollution Control Permit to Operate
Title V Operating Permit Program at 40 CFR Part 71

Williston Basin Interstate Pipeline Company
Hardin Compressor Station

Permit Number: V-C-000001-2013.00
Replaces Permit No.: V-C-0001-06.00

Issue Date: TBD
Effective Date: TBD
Expiration Date: TBD

The permit number cited above should be referenced in future correspondence regarding this facility.

Table 1. Part 71 Permitting History

Date of Action	Permit Number	Type of Action	Description of Action
June 17, 2002	V-C-0001-00.00	Initial Permit	N/A
September 26, 2008	V-C-0001-06.00	1st Permit Renewal	N/A
TBD	V-C-00001-2013.00	2nd Permit Renewal	N/A

Table of Contents

I. Facility Information and Emission Unit Identification

A. Facility Information

Operator Name:	Williston Basin Interstate Pipeline Company, Inc.
Plant Name:	Hardin Compressor Station
Plant Location:	SW ¼ , SE ¼ of Section 17, Township 1 South, Range 34 East Lat.: 45.73887 N, Long.: 107.544 W
Region:	8
State:	Montana
County:	Big Horn
Reservation:	Crow Indian Reservation
Tribe:	Crow Tribe
Responsible Official:	Director of Pipeline Operations
SIC Code:	4922

Description:

The Hardin Compressor Station is owned and operated by Williston Basin Interstate Pipeline Company, Inc. (WBI). The Hardin Compressor Station is a natural gas boosting facility located in south central Montana. The facility is located on Indian country lands within the Crow Indian Reservation.

The Hardin Compressor Station provides natural gas compression along the transmission pipeline. The gas is compressed from approximately 300 pounds per square inch gage (psig) to approximately 780 psig at maximum normal operating conditions and does not exceed 800 psig which is the maximum allowable. Four (4) Ingersoll-Rand 62K VG 660BHP reciprocating internal combustion engines (RICE) were installed in 1954, providing compression power to the facility. The compressor station is a booster along the natural gas transmission pipeline system. A small portion of the natural gas is taken off the compression line to be used as fuel for the units to run the station.

B. Facility Emission Points

Table 2 – Emission Units and Emission Generating Activities

	Description	

Emission Unit ID		Control Equipment
Unit 1 Unit 2 Unit 3 Unit 4	5.94 MMBtu/hr, Ingersoll-Rand 62KVG, 660 hp Four Stroke Rich Burn (4SRB) RICE. Spark Ignition, Natural gas fired: Serial Number: 62NL846 Installed: 1954 Serial Number: 62NL847 Installed: 1954 Serial Number: 62NL848 Installed: 1954 Serial Number: 62NL849 Installed: 1954	None
GEN-1	1.305 MMBtu/hr, 137 bhp, Waukesha F1197G, 100 kW 4SRB Generator Set. Natural gas fired: Serial Number: 1109881 Installed: 1999	None

*hp = horsepower; MMBtu/hr = million British thermal units per hour.

Table 3 - Insignificant Emission Units*

Description
45 - Valves on station piping, potential fugitive natural gas emissions
149 -Flanges on station piping, potential fugitive natural gas emissions
10 - Open-ended lines on station piping, potential fugitive natural gas emissions
10 - Pressure relief valves on station piping, potential fugitive natural gas emissions
8 – compressor seals on station compressors with potential fugitive natural gas emissions
1 - 30,000 Btu/hr natural gas-fired domestic water heater
1 - 40,000 Btu/hr natural gas fired domestic water heater
1 - 70,000 Btu/hr natural gas fired shop heater
1 - 75,000 Btu/hr natural gas-fired auxiliary building heater
1 - 50,000 Btu/hr natural gas furnace
1 - 2,000 gallon used oil tank
1 - 1,000 gallon ethylene glycol storage tank
1 - 1,200 gallon ethylene glycol storage tank
1 - 3,200 gallon ethylene glycol/water storage tank
1 - 500 gallon methanol storage tank
1 - 2,000 gallon waste water tank
1 – 2,000 gallon condensate tank
1 – 6,000 gallon fresh-water tank
1 - 1,000 gallon waste water tank
1 - 1,000 gallon slop tank
1 - Office air conditioning unit, installed 1998
In-plant vehicle traffic
Repair and maintenance activities

*Insignificant emission units can change at the facility as long as the new or replacement units meet the criteria for insignificance, and WBIsupplies information as required under 40 CFR part 71 and this permit. The insignificant emission unit status does not exempt these emission units from the requirements of the NSPS and MACT standards that may apply.

II. 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines

A. Applicability

40 CFR part 63, subpart ZZZZ applies to the following emission unit(s):

1. Ingersoll-Rand 62KVG engines identified as Unit 1, Unit 2, Unit 3, Unit 4 in Table 2 of this permit.

2. Waukesha F1197G generator engine identified as GEN-1 in Table 2 of this permit.

[40 CFR 63.6585(a) and (c)]

B. General Provisions [40 CFR 63.6665]

1. The General Provisions at 40 CFR part 63, subpart A apply as specified in Table 8 of 40 CFR part 63, subpart ZZZZ. Notwithstanding conditions in this permit, the Permittee shall comply with all applicable requirements of 40 CFR part 63, subpart A.

2. All reports required under 40 CFR part 63, subpart A shall be sent to the EPA at the following address as listed in 40 CFR 63.13:

   Director, Air and Toxics Technical Enforcement Program, 8ENF–AT
   Office of Enforcement, Compliance and Environmental Justice
   1595 Wynkoop Street, Denver, CO 80202–1129

C. Maintenance Requirements for Engine GEN-1

1. The Permittee shall meet the requirements in Table 2d for existing stationary RICE located at an area source of HAP emissions.

[40 CFR 63.6603 (a)]

2. The Permittee shall meet the following requirements for a non-emergency, non-black start 4SRB stationary RICE less than or equal to 500 hp:

   i. Change oil and filter every 1,440 hours of operation or annually, whichever comes first;
   ii. Inspect spark plugs every 1,440 hours of operation or annually, and replace as necessary; and
   iii. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replaces as necessary.

[40 CFR part 63, subpart ZZZZ, Table 2d]

D. Maintenance Requirements for Engine Units 1-4

1. Emission and Operating Limitations

The Permittee shall meet the requirements in Table 2d for existing stationary RICE located at an area source of HAP emissions.

[40 CFR 63.6603(a)]

2. The Permittee shall meet the following requirements for a non-emergency, non-black start 4SRB remote stationary RICE greater than 500 hp:

   i. Change oil and filter every 2,160 hours of operation or annually, whichever comes first;
   ii. Inspect spark plugs every 2,160 hours of operation or annually, whichever comes first, and replace as necessary; and
   iii. Inspect all hoses and belts every 2,160 hours of operation or annually, whichever comes first, and replace as necessary.

[Table 2d:11]

3. As the owner and operator of an existing non-emergency 4SRB stationary RICE with a site rating of more than 500 hp located at an area source of HAP, the Permittee shall meet the definition of remote stationary RICE in §63.6675 on the initial compliance date for the engine, October 19, 2013, in order to be considered a remote stationary RICE under this subpart and must evaluate the status of the RICE every 12 months. The Permittee shall follow the Testing and Initial Compliance Requirements as required in §63.6630.

[40 CFR 63.6603 (f)]

3. **Continuous Compliance Requirements**

   a. The Permittee shall be in compliance with the emission limitations, operating limitations, and other requirements which apply, at all times. The Permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emissions or operating levels.

[40 CFR 63.6605(a) and (c)]

   b. The Permittee shall operate and maintain the engines, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions, at all times.

[40 CFR 63.6605(b)]

   c. The Permittee shall demonstrate continuous compliance with each emission limitation, operating limitation and other requirements that apply as specified in Table 2d and Table 6.

[40 CFR 63.6640 and Table 6]

4. **Notifications, Reports, and Records**

a. The Permittee shall submit notifications as specified in §63.6645.

b. The Permittee shall submit reports as specified in §63.6650.

c. The Permittee shall keep records as specified in §63.6655.

d. The Permittee shall keep the records in the format and for the duration as specified in §63.6660.

[40 CFR 63.6645, 63.6650, 63.6655, 63.6660]

III. Facility-Wide Requirements [40 CFR 71.6(a)(1)]

Conditions in this section of this permit apply to all emissions units located at the source, including any units not specifically listed in Table 2 of the Facility Emission Points section of this permit.

A. Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]

The Permittee shall comply with the following generally applicable recordkeeping requirements:

1. If the Permittee determines that his or her stationary source that emits (or has the potential to emit, without considering controls) one or more HAPs is not subject to a relevant standard or other requirement established under 40 CFR part 63, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first. The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source).

[40 CFR 63.10(b)(3)]

2. Records shall be kept of off permit changes, as required by the Off Permit Changes section of this permit.

B. Reporting Requirements [40 CFR 71.6(a)(3)(iii)]

1. The Permittee shall submit to the EPA all reports of any required monitoring under this permit semiannually. The first report shall cover the period from the effective date of this permit through December 31st, 2017 Thereafter, the report shall be submitted semi-annually, by April 1st and October 1st of each year. The report due on April 1st shall cover the 6 month period ending on the last day of December before the report is due. The report due on October 1st shall cover the 6 month period ending on the last day of June before the report is due. All instances of deviations from permit requirements shall be clearly identified in such reports. All required reports shall be certified by a responsible official consistent with the Submissions section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "SIXMON" for 6 month monitoring reports. The form may be found on the EPA's website at:
https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.*]*

2. "Deviation" means any situation in which an emissions unit fails to meet a permit term or condition. A deviation is not always a violation. A deviation can be determined by observation or through review of data obtained from any testing, monitoring, or recordkeeping established in accordance with 40 CFR 71.6(a)(3)(i) and (a)(3)(ii). For a situation lasting more than 24 hours which constitutes a deviation, each 24-hour period is considered a separate deviation. Included in the meaning of deviation are any of the following:

   (a) A situation where emissions exceed an emission limitation or standard;

   (b) A situation where process or emissions control device parameter values indicate that an emission limitation or standard has not been met; or

   (c) A situation in which observations or data collected demonstrate noncompliance with an emission limitation or standard or any work practice or operating condition required by the permit.

3. The Permittee shall promptly report to the EPA deviations from permit requirements, including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined as follows:

   (a) Any definition of "prompt" or a specific time frame for reporting deviations provided in an underlying applicable requirement as identified in this permit.

   (b) Where the underlying applicable requirement fails to address the time frame for reporting deviations, reports of deviations will be submitted based on the following schedule:

      (i) For emissions of a HAP or a toxic air pollutant (as identified in the applicable regulation) that continue for more than an hour in excess of permit requirements, the report must be made within 24 hours of the occurrence.
      (ii) For emissions of any regulated air pollutant, excluding a HAP or a toxic air pollutant that continues for more than 2 hours in excess of permit requirements, the report must be made within 48 hours.
      (iii) For all other deviations from permit requirements, the report shall be submitted with the semi-annual monitoring report.

   (c) If any of the conditions in (i) or (ii) of paragraph (b) above are met, the Permittee

must notify the EPA by telephone (1-800-227-6312), facsimile (303-312-6409), or by email to r8airreportenforcement@epa.gov based on the timetables listed above. *[Notification must specify that this notification is a deviation report for a Part 71 permit].* A written notice, certified consistent with the Submissions section of this permit must be submitted within 10 working days of the occurrence. All deviations reported under this section must also be identified in the 6-month report required under Condition 1 in this section of this permit.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a form "PDR" for prompt deviation reporting. The form may be found on the EPA's website at:
https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits.]

IV. General Provisions

A. Annual Fee Payment [40 CFR 71.9]

1. The Permittee shall pay an annual permit fee in accordance with the procedures outlined below.

2. The Permittee shall pay the annual permit fee each year no later than April 1st. The fee shall cover the previous calendar year.

3. The fee payment shall be in United States currency and shall be paid by money order, bank draft, certified check, corporate check, or electronic funds transfer payable to the order of the U.S. Environmental Protection Agency.

4. The Permittee shall send fee payment and a completed fee filing form to:

For regular U.S. Postal Service mail	**For non-U.S. Postal Service express mail** (FedEx, Airborne, DHL, and UPS)
U.S. Environmental Protection Agency FOIA and Miscellaneous Payments Cincinnati Finance Center P.O. Box 979078 St. Louis, MO 63197-9000	U.S. Bank Government Lockbox 979078 U.S. EPA FOIA & Misc. Payments 1005 Convention Plaza SL-MO-C2-GL St. Louis, MO 63101

5. The Permittee shall send an updated fee calculation worksheet form and a photocopy of each fee payment check (or other confirmation of actual fee paid) submitted annually by the same deadline as required for fee payment to the address listed in the Submissions section of this permit.

[Explanatory note: The fee filing form "FF" and the fee calculation worksheet form "FEE" may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-

operating-permits/

6. Basis for calculating annual fee:

(a) The annual emissions fee shall be calculated by multiplying the total tons of actual emissions of all "regulated pollutants (for fee calculation)" emitted from the source by the presumptive emissions fee (in dollars per ton) in effect at the time of calculation.

(i) "Actual emissions" means the actual rate of emissions in tpy of any regulated pollutant (for fee calculation) emitted from a Part 71 source over the preceding calendar year. Actual emissions shall be calculated using each emissions unit's actual operating hours, production rates, in-place control equipment, and types of materials processed, stored, or combusted during the preceding calendar year.

(ii) Actual emissions shall be computed using methods required by the permit for determining compliance, such as monitoring or source testing data.

(iii) If actual emissions cannot be determined using the compliance methods in the permit, the Permittee shall use other federally recognized procedures.

[Explanatory note: The presumptive fee amount is revised each calendar year to account for inflation, and it is available from the EPA prior to the start of each calendar year.]

(b) The annual emissions fee shall be increased by a greenhouse gas (GHG) fee adjustment for any source that has initiated an activity listed in table at §71.9(c)(8) since the fee was last paid. The GHG fee adjustment shall be equal to the set fee provided in the table at §71.9(c)(8) for each activity that has been initiated since the fee was last paid.

(c) The Permittee shall exclude the following emissions from the calculation of fees:

(i) The amount of actual emissions of each regulated pollutant (for fee calculation) that the source emits in excess of 4,000 tpy;

(ii) Actual emissions of any regulated pollutant (for fee calculation) already included in the fee calculation; and

(iii) The quantity of actual emissions (for fee calculation) of insignificant activities [defined in 40 CFR 71.5(c)(11)(i)] or of insignificant emissions levels from emissions at the source identified in the Permittee's application pursuant to 40 CFR 71.5(c)(11)(ii).

7. Fee calculation worksheets shall be certified as to truth, accuracy, and completeness by a responsible official.

[Explanatory note: The fee calculation worksheet form already incorporates a section to help you meet this responsibility.]

8. The Permittee shall retain fee calculation worksheets and other emissions-related data used to determine fee payment for 5 years following submittal of fee payment. [Emission-related data include, for example, emissions-related forms provided by the EPA and used by the Permittee for fee calculation purposes, emissions-related spreadsheets, and emissions-related data, such as records of emissions monitoring data and related support information required to be kept in accordance with 40 CFR 71.6(a)(3)(ii).]

9. Failure of the Permittee to pay fees in a timely manner shall subject the Permittee to assessment of penalties and interest in accordance with 40 CFR 71.9(l).

10. When notified by the EPA of underpayment of fees, the Permittee shall remit full payment within 30 days of receipt of notification.

11. A Permittee who thinks an EPA-assessed fee is in error and who wishes to challenge such fee, shall provide a written explanation of the alleged error to the EPA along with full payment of the EPA assessed fee.

B. Annual Emissions Inventory [40 CFR 71.9(h)(1) and (2)]

1. The Permittee shall submit an annual emissions report of its actual emissions for both criteria pollutants and regulated HAPs for this source for the preceding calendar year for fee assessment purposes. The annual emissions report shall be certified by a responsible official and shall be submitted each year to the EPA by April 1st.

2. The annual emissions report shall be submitted to the EPA at the address listed in the Submissions section of this permit.

[Explanatory note: An annual emissions report, required at the same time as the fee calculation worksheet by 40 CFR 71.9(h), has been incorporated into the fee calculation worksheet form as a convenience.]

C. Compliance Requirements [40 CFR 71.6(a)(6), Section 113(a) and 113(e)(1) of the CAA, and 40 CFR 51.212, 52.12, 52.33, 60.11(g), 61.12]

1. Compliance with the Permit

   (a) The Permittee must comply with all conditions of this Part 71 permit. Any permit noncompliance constitutes a violation of the CAA and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

   (b) It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(c) For the purpose of submitting compliance certifications in accordance with §71.6(c)(5), or establishing whether or not a person has violated or is in violation of any requirement of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

2. Compliance Schedule [40 CFR 71.5(c)(8)(iii)]

(a) For applicable requirements with which the source is in compliance, the source will continue to comply with such requirements.

(b) For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis.

3. Compliance Certifications [40 CFR 71.6(c)(5)]

(a) The Permittee shall submit to the EPA a certification of compliance with permit terms and conditions, including emission limitations, standards, or work practices annually by April 1st, and shall cover the same 12-month period as the two consecutive semi-annual monitoring reports.

[Explanatory note: To help Part 71 Permittees meet reporting responsibilities, the EPA has developed a reporting form for annual compliance certifications. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits*]*

(b) The compliance certification shall be certified as to truth, accuracy, and completeness by a responsible official consistent with 40 CFR 71.5(d).

(c) The certification shall include the following:

(i) Identification of each permit term or condition that is the basis of the certification;

(ii) The identification of the method(s) or other means used for determining the compliance status of each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required in this permit. If necessary, the Permittee also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the CAA, which prohibits knowingly making a false certification or omitting material information;

(iii) The status of compliance with each term and condition of the permit for the period covered by the certification based on the method or means designated in (ii) above. The certification shall identify each deviation and take it into account in the compliance certification;

(iv) Such other facts as the EPA may require to determine the compliance status of the source; and

(v) Whether compliance with each permit term was continuous or intermittent.

D. Duty to Provide and Supplement Information
[40 CFR 71.6(a)(6)(v), 71.5(a)(3), and 71.5(b)]

1. The Permittee shall furnish to the EPA, within a reasonable time, any information that the EPA may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the EPA copies of records that are required to be kept pursuant to the terms of the permit, including information claimed to be confidential. Information claimed to be confidential must be accompanied by a claim of confidentiality according to the provisions of 40 CFR part 2, subpart B.

2. The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. In addition, a Permittee shall provide additional information as necessary to address any requirements that become applicable after the date a complete application is filed, but prior to release of a draft permit.

E. Submissions [40 CFR 71.5(d), 71.6(c)(1) and 71.9(h)(2)]

1. Any document (application form, report, compliance certification, etc.) required to be submitted under this permit shall be certified by a responsible official as to truth, accuracy, and completeness. Such certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

[Explanatory note: the EPA has developed a reporting form "CTAC" for certifying truth, accuracy and completeness of Part 71 submissions. The form may be found on the EPA's website at: https://www.epa.gov/title-v-operating-permits/epa-issued-operating-permits*]*

All fee calculation worksheets and applications for renewals and permit modifications shall be submitted to:

Part 71 Permit Contact, Air Program, 8P-AR
U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

2. Except where otherwise specified, all reports, test data, monitoring data, notifications, and compliance certifications shall be submitted to:

Director, Air Toxics and Technical Enforcement Program, 8ENF-AT

U.S. Environmental Protection Agency,
1595 Wynkoop Street
Denver, Colorado 80202

F. Severability Clause [40 CFR 71.6(a)(5)]

The provisions of this permit are severable, and in the event of any challenge to any portion of this permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force.

G. Permit Actions [40 CFR 71.6(a)(6)(iii)]

This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

H. Administrative Permit Amendments [40 CFR 71.7(d)]

The Permittee may request the use of administrative permit amendment procedures for a permit revision that:

1. Corrects typographical errors;

2. Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;

3. Requires more frequent monitoring or reporting by the Permittee;

4. Allows for a change in ownership or operational control of a source where the EPA determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA;

5. Incorporates into the Part 71 permit the requirements from preconstruction review permits authorized under an EPA-approved program, provided that such a program meets procedural requirements substantially equivalent to the requirements of 40 CFR 71.7 and 71.8 that would be applicable to the change if it were subject to review as a permit modification, and compliance requirements substantially equivalent to those contained in 40 CFR 71.6; or

6. Incorporates any other type of change which the EPA has determined to be similar to those listed in (1) through (5) above.

[Note to Permittee: If 1 through 5 above do not apply, please contact the EPA for a determination of similarity prior to submitting your request for an administrative permit amendment under this provision.]

I. Minor Permit Modifications [40 CFR 71.7(e)(1)]

1. The Permittee may request the use of minor permit modification procedures only for those modifications that:

   (a) Do not violate any applicable requirement;

   (b) Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;

   (c) Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;

   (d) Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:

      (i) A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I; and
      (ii) An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA;

   (e) Are not modifications under any provision of Title I of the CAA; and

   (f) Are not required to be processed as a significant modification.

2. Notwithstanding the list of changes ineligible for minor permit modification procedures in 1 above, minor permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in an applicable implementation plan or in applicable requirements promulgated by the EPA.

3. An application requesting the use of minor permit modification procedures shall meet the requirements of 40 CFR 71.5(c) and shall include the following:

   (a) A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;

   (b) The source's suggested draft permit;

(c) Certification by a responsible official, consistent with 40 CFR 71.5(d), that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and

(d) Completed forms for the permitting authority to use to notify affected States as required under 40 CFR 71.8.

4. The source may make the change proposed in its minor permit modification application immediately after it files such application. After the source makes the change allowed by the preceding sentence, and until the permitting authority takes any of the actions authorized by 40 CFR 71.7(e)(1)(iv)(A) through (C), the source must comply with both the applicable requirements governing the change and the proposed permit terms and conditions. During this time period, the source need not comply with the existing permit terms and conditions it seeks to modify. However, if the source fails to comply with its proposed permit terms and conditions during this time period, the existing permit terms and conditions it seeks to modify may be enforced against it.

5. The permit shield under 40 CFR 71.6(f) may not extend to minor permit modifications.

J. Significant Permit Modifications [40 CFR 71.7(e)(3), 71.8(d), and 71.5(a)(2)]

1. The Permittee must request the use of significant permit modification procedures for those modifications that:

(a) Do not qualify as minor permit modifications or as administrative amendments;

(b) Are significant changes in existing monitoring permit terms or conditions; or

(c) Are relaxations of reporting or recordkeeping permit terms or conditions.

2. Nothing herein shall be construed to preclude the Permittee from making changes consistent with Part 71 that would render existing permit compliance terms and conditions irrelevant.

3. Permittees must meet all requirements of Part 71 for applications, public participation, and review by affected states and tribes for significant permit modifications. For the application to be determined complete, the Permittee must supply all information that is required by 40 CFR 71.5(c) for permit issuance and renewal, but only that information that is related to the proposed change.

K. Reopening for Cause [40 CFR 71.7(f)]

The permit may be reopened and revised prior to expiration under any of the following circumstances:

1. Additional applicable requirements under the CAA become applicable to a major Part 71 source with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to 40 CFR 71.7(c)(3);

2. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator, excess emissions offset plans shall be deemed to be incorporated into the permit;

3. EPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

4. EPA determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

L. Property Rights [40 CFR 71.6(a)(6)(iv)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

M. Inspection and Entry [40 CFR 71.6(c)(2)]

1. Upon presentation of credentials and other documents as may be required by law, the Permittee shall allow the EPA or an authorized representative to perform the following:

2. Enter upon the Permittee's premises where a Part 71 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

3. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

4. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and

5. As authorized by the CAA, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

N. Transfer of Ownership or Operation [40 CFR 71.7(d)(1)(iv)]

A change in ownership or operational control of this source may be treated as an administrative permit amendment if the EPA determines no other change in this permit is necessary and

provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the EPA.

O. Off Permit Changes [40 CFR 71.6(a)(12) and 40 CFR 71.6(a)(3)(ii)]

The Permittee is allowed to make certain changes without a permit revision, provided that the following requirements are met, and that all records required by this section are kept for a period of 5 years:

1. Each change is not addressed or prohibited by this permit;

2. Each change shall meet with all applicable requirements and shall not violate any existing permit term or condition;

3. Changes under this provision may not include changes subject to any requirement of 40 CFR parts 72 through 78 or modifications under any provision of Title I of the CAA;

4. The Permittee must provide contemporaneous written notice to the EPA of each change, except for changes that qualify as insignificant activities under 40 CFR 71.5(c)(11). The written notice must describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirements that would apply as a result of the change;

5. The permit shield does not apply to changes made under this provision;

6. The Permittee must keep a record describing all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes;

7. The notice shall be kept on site and made available to the EPA on request, in accordance with the general recordkeeping provision of this permit; and

8. Submittal of the written notice required above shall not constitute a waiver, exemption, or shield from applicability of any applicable standard or Prevention of Significant Deterioration (PSD) permitting requirements under 40 CFR 52.21 that would be triggered by the change.

P. Permit Expiration and Renewal [40 CFR 71.5(a)(1)(iii), 71.5(a)(2), 71.5(c)(5), 71.6(a)(11), 71.7(b), 71.7(c)(1), and 71.7(c)(3)]

1. This permit shall expire upon the earlier occurrence of the following events:

   (a) Five (5) years elapse from the date of issuance; or

   (b) The source is issued a Part 70 or Part 71 permit under an EPA-approved or delegated permit program.

2. Expiration of this permit terminates the Permittee's right to operate unless a timely and complete permit renewal application has been submitted at least 6 months but not more than 18 months prior to the date of expiration of this permit.

3. If the Permittee submits a timely and complete permit application for renewal, consistent with 40 CFR 71.5(a)(2), but the EPA has failed to issue or deny the renewal permit, then all the terms and conditions of the permit, including any permit shield granted pursuant to 40 CFR 71.6(f) shall remain in effect until the renewal permit has been issued or denied.

4. The Permittee's failure to have a Part 71 permit is not a violation of this part until the EPA takes final action on the permit renewal application. This protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit any additional information identified as being needed to process the application by the deadline specified in writing by the EPA.

5. Renewal of this permit is subject to the same procedural requirements that apply to initial permit issuance, including those for public participation, affected State, and tribal review.

6. The application for renewal shall include the current permit number, description of permit revisions and off permit changes that occurred during the permit term, any applicable requirements that were promulgated and not incorporated into the permit during the permit term, and other information required by the application form.

Air Pollution Control
Federal Clean Air Act (CAA) Title V Permit to Operate
Statement of Basis for Draft Permit No. V-C-000001-2013.00

Williston Basin Interstate Energy Transmission, Inc.
Hardin Compressor Station
Crow Reservation
Big Horn County, Montana

I. Facility Information

A. Location

Williston Basin Interstate Energy Transmission, Inc. (WBI) Hardin Compressor Station (Hardin) is located on Indian country lands within the Crow Indian Reservation, in the south central part of Montana, in Big Horn County. Hardin's physical location is SW ¼ SE ¼ of Section 17, Township 1 South, Range 34 East, and 45.73887N latitude, and -107.544 W longitude, at an elevation of 2,970 feet above mean sea level. The facility mailing address is:

Hardin Compressor Station
Williston Basin Interstate Energy Transmission, Inc. (subsidiary of WBI Holdings, Inc.)
P.O. Box 131
Glendive, Montana 59330

B. Contact

Facility Contact:
Ron Lowney
Senior Environmental Scientist
WBI Energy Transmission, Inc.
2010 Montana Avenue
Glendive, Montana 59330
(406) 359-7295

Responsible Official:
Scott A. Fradenburgh
Director of Pipeline Operations
WBI Energy Transmission, Inc.
2010 Montana Avenue
Glendive, MT 59330
406-359-7200

Tribal Contact:
Charlene Alden, Environmental Director
Crow Indian Reservation
P.O. Box 159
Crow Agency, MT 29022
406-629-0387

C. Description of Operations

Hardin provides natural gas compression along the transmission line. The gas is compressed from

approximately 300 pounds per square inch gage (psig) to approximately 780 psig at maximum normal operating conditions and does not exceed 800 psig which is the maximum allowable. Four (4) Ingersoll-Rand 62K VG 660BHP reciprocating internal combustion engines were installed in 1954, providing compression power to the facility. The compressor station is a booster along the natural gas transmission pipeline system. A small portion of the pipeline natural gas is taken off the compression line to be used as fuel for the four (4) compressor engines, a generator and various other emission units at the facility.

D. Emission Points

Table 1 lists emission units and emission generating activities, including any air pollution control devices. The Title V Operating Permit Program at 40 CFR part 71 (Part 71) allows the Permittee to separately list in the permit application units or activities that qualify as "insignificant" based on potential emissions below 2 tons per year (tpy) for all regulated pollutants that are not listed as hazardous air pollutants (HAP) under section 112(b) and below 1,000 lbs/year or the de minimis level established under section 112(g), whichever is lower, for HAPs. However, the application may not omit information needed to determine the applicability of, or to impose, any applicable requirement. Units and activities that qualify as "insignificant" for the purposes of the Part 71 application are in no way exempt from applicable requirements or any requirements of the Part 71 permit.

Table 1 – Emission Units and Emission Generating Activities

Emission Unit ID	Description	Control Equipment
Unit 1 Unit 2 Unit 3 Unit 4	5.94 MMBtu/hr, Ingersoll-Rand 62KVG, 660 hp Four Stroke Rich Burn (4SRB) RICE. Spark Ignition, Natural gas fired: Serial Number: 62NL846 Installed: 1954 Serial Number: 62NL847 Installed: 1954 Serial Number: 62NL848 Installed: 1954 Serial Number: 62NL849 Installed: 1954	None
GEN-1	1.305 MMBtu/hr, 137 bhp, Waukesha F1197G, 100 kW4SRB Generator Set. Spark Ignition, Natural gas fired: Serial Number: 1109881 Installed: 1999	None

*hp = horsepower; MMBtu/hr = million British thermal units per hour.

Table 2 - Insignificant Emission Units*

Description
45 - Valves on station piping, potential fugitive natural gas emissions
149 -Flanges on station piping, potential fugitive natural gas emissions
10 - Open-ended lines on station piping, potential fugitive natural gas emissions
10 - Pressure relief valves on station piping, potential fugitive natural gas emissions
8 – compressor seals on station compressors with potential fugitive natural gas emissions
1 - 30,000 Btu/hr natural gas-fired domestic water heater
1 - 40,000 Btu/hr natural gas fired domestic water heater
1 - 70,000 Btu/hr natural gas fired shop heater
1 - 75,000 Btu/hr natural gas-fired auxiliary building heater
1 - 50,000 Btu/hr natural gas furnace
1 - 2,000 gallon used oil tank
1 - 1,000 gallon ethylene glycol storage tank
1 - 1,200 gallon ethylene glycol storage tank
1 - 3,200 gallon ethylene glycol/water storage tank
1 - 500 gallon methanol storage tank

1 - 2,000 gallon waste water tank
1 – 2,000 gallon condensate tank
1 – 6,000 gallon fresh-water tank
1 - 1,000 gallon waste water tank
1 - 1,000 gallon slop tank
1 - Office air conditioning unit, installed 1998
In-plant vehicle traffic
Repair and maintenance activities

*Insignificant emission units can change at the facility as long as the new or replacement units meet the criteria for insignificance, and WBI supplies information as required under 40 CFR part 71 and this permit. The insignificant emission unit status does not exempt these emission units from the requirements of the NSPS and MACT standards that may apply.

E. Potential to Emit

Pursuant to 40 CFR 52.21, potential to emit (PTE) is defined as the maximum capacity of a stationary source to emit a pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the source to emit a pollutant, including air pollution control equipment and restrictions on hours of operation or on the type or amount of material combusted, stored, or processed, shall be treated as part of its design if the limitation, or the effect it would have on emissions, is federally enforceable. Independently enforceable applicable requirements are considered enforceable to the extent that the source is in compliance with the standard. In addition, beneficial reductions in non-targeted pollutants resulting from compliance with an independently enforceable applicable requirement may be counted towards PTE provided the emission reduction of the non-targeted pollutant is enforceable as a practical matter and compliance is being met. See the 1995 guidance memo signed by John Seitz, Director of the Office of Air Quality Planning and Standards titled, "Options for Limiting Potential to Emit of a Stationary Source under Section 112 and Title V of the Clean Air Act".

There are no emission controls on the four (4) natural gas-fired compressor engines (Units 1 – 4) or the natural gas fired generator set (GEN-1). Hardin is an area source of hazardous air pollutants (HAP) according to the National Emissions Standards for HAP (NESHAP) at 40 CFR part 63 (Part 63), also known as Maximum Available Control Technology (MACT) requirements. Units 1-4 and GEN-1 are subject to the requirements in MACT subpart ZZZZ, as discussed in Section II, Applicable Requirements Review of this statement of basis, and contained in the corresponding draft permit Table 3 includes the PTE for Hardin provided by WBI in the Part 71 permit renewal application

Table 3 – Potential-to-Emit with Legally and Practically Enforceable Controls

Emission Unit Id.							
	NO_x* (tons/yr)	VOC (tons/yr)	SO_2 (tons/yr)	PM_{10} (tons/yr)	CO (tons/yr)	Lead (tons/yr)	HAP (tons/yr)
Unit 1	95.6	2.8	0.01	0.3	159.3	0	0.53
Unit 2	95.6	2.8	0.01	0.3	159.3	0	0.53
Unit 3	95.6	2.8	0.01	0.3	159.3	0	0.53
Unit 4	95.6	2.8	0.01	0.3	159.3	0	0.53
GEN-1	16.8	0.3	0	0.06	16.8	0	0.12
TOTAL	399.2	11.5	0.04	1.26	654	0	2.24

*NO_x = nitrogen oxide; VOC = volatile organic compound; SO_2 = sulfur dioxide; PM = particulate matter; CO = carbon monoxide; HAP = hazardous air pollutant.

II. Applicable Requirement Review

The discussions in the following sections are based on the information provided by WBI in their Part 71 renewal application, certified to be true and accurate by the Responsible Official of this facility.

A. 40 CFR 52.21 - Prevention of Significant Deterioration

The Prevention of Significant Deterioration (PSD) Permit Program at 40 CFR part 52 is a preconstruction review requirement of the CAA that applies to proposed projects that are sufficiently large (in terms of emissions) to be a "major" stationary source or "major" modification of an existing stationary source. Source size is defined in terms of PTE, which is its capability at maximum design capacity to emit a pollutant, except as constrained by existing legally and practically enforceable conditions applicable to the source. A new stationary source or a modification to an existing minor stationary source is major if the proposed project has the PTE any pollutant regulated under 40 CFR part 52 in amounts equal to or exceeding specified major source thresholds, which are 100 tpy for 28 listed industrial source categories and 250 tpy for all other sources. The PSD Permit Program also applies to modifications at existing major sources that cause a "significant net emissions increase" at that source. Significance levels for each pollutant are defined in the PSD regulations at 40 CFR 52.21.

A review of the Hardin Compressor Station application shows that it is a major stationary source, according to the definition in 40 CFR 52.21(b)(1), of NO_x and CO emissions. As explained below, this facility has not yet been required to obtain a PSD permit. However, any major modification or net emissions increase associated with a modification to this facility would require that the Hardin Compressor Station obtain a pre-construction permit pursuant to federal regulations at 40 CFR 52.21(b)(2).

The Hardin Compressor Station commenced operation in 1954, prior to promulgation of 40 CFR part 52 on August 7, 1977. Hardin Compressor Station was, therefore, considered an existing facility when the rule became effective and was not required to obtain a PSD pre-construction permit.

The Waukesha Model F1197G, 100 kW generator set was installed in 1999 and replaced a 60 kW Buda model JL 1535 generator set. Based on the information provided, this construction sequence at the Hardin Compressor Station did not trigger PSD permitting requirements of 40 CFR 52.21, because the PTE of the modification was 16.8 tpy each for both NO_x and CO emissions, which is below the significance thresholds for emissions increases of 40 tpy (NO_x) and 100 tpy (CO), respectively.

B. Source Determination

At 40 CFR 71.2, a major source is generally defined as any stationary source (or any group of stationary sources that are located on one or more contiguous or adjacent properties, are under common control of the same person (or persons under common control)), and belonging to a single major industrial grouping. On June 3, 2016, the EPA published a final rule clarifying when oil and natural gas sector equipment and activities must be deemed a single source when determining whether major source permitting programs (PSD and New Source Review preconstruction Permit Programs, and the Part 71 Permit Program) apply (81 FR 35622). By defining the term "adjacent," the rule specifies that equipment and activities in the oil and natural gas sector that are under common control will be considered part of the same source if they are located on the same surface site or on individual surface sites that share equipment and are within ¼ mile of each other. The EPA had previously defined adjacent through policy interpretation and guidance. According to information provided by WBI, the

nearest emission source to Hardin along WBI's pipeline is over 80 miles away. There are no other emission sources in the same industrial grouping that are under the common control of WBI and located within ¼ mile of Hardin. Therefore, the EPA has determined that Hardin is not contiguous or adjacent to any other WBI owned and operated sources in the same industrial grouping as Hardin.

C. 40 CFR Part 60, Subpart A: General Provisions.

This subpart applies to the owner or operator of any stationary source which contains an affected facility, the construction or modification of which is commenced after the date of publication of any standard in 40 CFR part 60 (Part 60). The general provisions under subpart A apply to sources that are subject to the specific subparts of Part 60.

As explained below, there are no emission units operating at Hardin that are affected facilities subject to any subparts of Part 60. Therefore, the General Provisions of Part 60 do not apply.

D. 40 CFR Part 60, Subpart K: Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.

This rule applies to storage vessels for petroleum liquids with a storage capacity greater than 40,000 gallons. Subpart K does not apply to storage vessels for petroleum or condensate stored, processed, and/or treated at a drilling and production facility prior to custody transfer.

Based on the information provided by WBI in their Part 71 renewal application, storage capacities of all tanks at Hardin are less than 40,000 gallons. Therefore, this facility is not subject to this subpart.

E. 40 CFR Part 60, Subpart Ka: Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to June 23, 1984.

This rule applies to storage vessels for petroleum liquids with a storage capacity greater than 40,000 gallons. Subpart Ka does not apply to petroleum storage vessels with a capacity of less than 420,000 gallons used for petroleum or condensate stored, processed, or treated prior to custody transfer.

Based on the information provided by WBI in their Part 71 renewal application, storage capacities of all storage vessels at Hardin are less than 40,000 gallons. Therefore, this facility is not subject to this subpart.

F. 40 CFR Part 60, Subpart Kb: Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984.

This rule applies to storage vessels with a capacity greater than or equal to 75 cubic meters used to store volatile organic liquids (VOLs).

Based on the information provided by WBI in their Part 71 renewal application, storage capacities of all storage vessels at Hardin are less than 75 cubic meters (19,813 gallons). Therefore, this facility is not subject to this subpart.

G. 40 CFR part 60, Subpart JJJJ: Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.

This subpart establishes emission standards and compliance requirements for the control of emissions from stationary spark ignition (SI) internal combustion engines (ICE) that commenced construction, modification or reconstruction after June 12, 2006, where the SI ICE are manufactured on or after specified manufacture trigger dates. The manufacture dates that trigger applicability to the requirements are based on the engine type, fuel used, and maximum engine horsepower.

Based on the information provided by WBI in their Part 71 renewal application, all compressor engines and the generator operating at the facility commenced construction, modification or reconstruction before June 12, 2016. Therefore, the facility is not subject to this subpart.

H. 40 CFR Part 60, Subpart OOOO: Standards of Performance for Crude Oil and Natural Gas production, Transmission, and Distribution

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after August 23, 2011. Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by WBI in their Part 71 application, the equipment operating at Hardin that are affected facilities predate the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

I. 40 CFR Part 60, Subpart OOOOa: Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015

This subpart establishes emission standards for the control of VOC and SO_2 emissions from affected facilities that commence construction, modification, or reconstruction after September 18, 2015. Affected facilities include, but are not limited to well completions, centrifugal compressors, reciprocating compressors, pneumatic controllers, storage vessels, and sweetening units.

Based on the information provided by WBI in their Part 71 application, the equipment operating at Hardin that are affected facilities predates the applicability date for this subpart. Therefore, this facility is not subject to this subpart.

J. 40 CFR Part 63, Subpart A: National Emission Standards for Hazardous Air Pollutants for Source Categories, General Provisions.

The requirements of subpart A of Part 63 apply to sources that are subject to the specific subparts of Part 63.

As explained below, the engines operating at Hardin are subject to subpart ZZZZ and therefore, the General Provisions of Part 63 do apply.

K. 40 CFR Part 63, Subpart HHH: National Emission Standards for Hazardous Air Pollutants from Natural Gas Transmission and Storage Facilities.

This rule applies to 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, and that are major sources of HAP emissions. Natural gas transmission means the pipelines used for long distance transport. Storage vessel means a tank or other vessel designed to contain an accumulation of crude oil, condensate, intermediate hydrocarbon liquids, produced water or other liquid and is constructed

primarily of non-earthen materials (e.g., wood, concrete, steel, plastic) that provide structural support.

Hardin meets the definition of a natural gas transmission and storage facility. However, Hardin is not a major source of HAP emissions. Additionally, the rule defines the affected source as "each glycol dehydration unit." Since the Hardin Compressor Station does not operate any glycol dehydration units and it is not a major source of HAP emissions, it is not subject to subpart HHH.

L. 40 CFR Part 63, Subpart ZZZZ (MACT ZZZZ): National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

This rule establishes national emission limitations and operating limitations for HAP emitted from stationary SI and compression ignition (CI) reciprocating internal combustion engines (RICE).

All currently permitted engines, Units 1-4 and generator, GEN-1 at the facility were constructed or reconstructed prior to June 12, 2006 and are therefore considered existing stationary RICE. On January 30, 2013, EPA published additional amendments to 40 CFR part 63, subpart ZZZZ, which outline a new subcategory of "Remote Stationary RICE" located at area sources of HAPs, as defined by 40 CFR 63.6675. According to WBI, Units 1-4 qualify as existing 4SRB remote stationary RICE greater than 500 bhp located at an area source of HAPs, have an initial compliance date of October 19, 2013, and must re-evaluate the remote status of their stationary RICE every 12 months according to 40 CFR 63.6603(f). Unit GEN-1 is an existing 4SRB less than or equal to 500 bhp located at an area source of HAPs and has an initial compliance date of October 19, 2013. Units 1-4 and GEN-1 are therefore subject to the applicable requirements for area sources found in 40 CFR part 63, subpart ZZZZ. As required by 40 CFR 63.6603 for existing SI RICE located at an area source of HAPs, emission Units 1-4 and GEN-1 must comply with the applicable operation and maintenance requirements outlined in Tables 2d and 6, and the applicable general provisions outlined in Table 8 of subpart ZZZZ.

M. 40 CFR Part 64: Compliance Assurance Monitoring

Pursuant to requirements concerning enhanced monitoring and compliance certification under the CAA, the EPA promulgated regulations to implement compliance assurance monitoring (CAM) for major stationary sources of air pollution, for purposes of Title V permitting that are required to obtain operating permits under Part 71. The rule requires owners or operators of such sources to conduct monitoring that provide a reasonable assurance of compliance with applicable requirements under the CAA.

1. CAM Applicability

According to 40 CFR 64.2(a), CAM applies to <u>each</u> pollutant specific emission unit (PSEU) located at a major source which is required to obtain a Part 71 permit if the unit satisfies all of the following criteria:

(a) The unit is subject to an emission limitation or standard for the applicable regulated air pollutant other than an emissions limitation or standard that is exempt under 40 CFR 64.2(b)(1);

(b) The unit uses a control device to achieve compliance with any such limit or standard; and

(c) The unit has pre-control device emissions of the applicable regulated pollutant that are equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major Title V source.

2. CAM Plan Submittal Deadlines

(a) Large PSEUs. A CAM plan submittal for all PSEUs with the PTE (taking into account control devices) of any one regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tpy, required for a source to be classified as a major source, is due at the following times:

(i) On or after April 20, 1998, if by that date, a Part 71 application has either:

(A) Not been filed; or
(B) Not yet been determined to be complete.

(ii) On or after April 20, 1998, if a Part 71 permit application for a significant modification is submitted with respect to those PSEUs for which the requested permit revision is applicable; or

(iii) Upon application for a renewed Part 71 permit and a CAM plan has not yet been submitted with an initial or a significant modification application, as specified above.

(b) Other PSEUs. A CAM Plan must be submitted for all PSEUs that are not large PSEUs, but are subject to this rule, upon application for a Part 71 renewal permit.

According to information provided by WBI in their Part 71 application, there are currently no PSEUs at Hardin that are subject to an emission standard or limitation requiring use of a control device to meet the limitation or standard. Therefore, the facility is not subject to CAM requirements.

N. 40 CFR Part 68: Chemical Accident Prevention Provisions

This rule applies to stationary sources that manufacture, process, use, store, or otherwise handle more than the threshold quantity of a regulated substance in a process. Regulated substances include 77 toxic and 63 flammable substances which are potentially present in the natural gas stream entering the facility and in the storage vessels located at the facility. The quantity of a regulated substance in a process is determined according to the procedures presented under 40 CFR 68.115. 40 CFR 68.115(b)(l) and (2)(i) indicate that toxic and flammable substances in a mixture do not need to be considered when determining whether more than a threshold quantity is present at a stationary source if the concentration of the substance is below one percent by weight of the mixture.

40 CFR 68.115(b)(2)(iii) indicates that prior to entry into a natural gas processing plant, regulated substances in naturally occurring hydrocarbon mixtures need not be considered when determining whether more than a threshold quantity is present at a stationary source. Naturally occurring hydrocarbon mixtures include condensate, field gas, and produced water.

Based on the information provided in WBI's Part 71 renewal application, Hardin does not have regulated substances above the threshold quantities in this rule and therefore is not subject to the requirement to develop and submit a risk management plan.

O. 40 CFR Part 71: Emergency Provisions

In this draft Part 71 renewal permit, the EPA is proposing to not include the "Emergency Provisions" located in permit condition III.O. in the current effective Part 71 permit. These provisions were modeled

on the "Emergency provision" contained in the regulations in 40 CFR part 71 applicable to federal operating permit programs. Specifically, in the regulations discussing the contents of Title V operating permits issued under the federal operating permits program, 40 CFR 71.6(g) provides that certain "emergency" events can constitute "an affirmative defense in an action brought for non-compliance" with certain emission limits contained in the permit, when certain conditions are met. However, nothing in the CAA or 40 CFR part 71 requires that these types of emergency provisions be included as conditions in operating permits issued by the EPA, and for the reasons discussed below, we are exercising our discretion not to include them in this draft Part 71 renewal permit.

In 2014, a federal court ruled that the CAA does not authorize the EPA to create affirmative defense provisions applicable to certain enforcement actions. *See NRDC v. EPA,* 749 F.3d 1055 (D.C. Cir. 2014). The court ruled that Sections 113 and 304 of the CAA preclude the EPA from creating affirmative defense provisions in the Agency's regulations imposing HAP emission limits on sources. The court concluded that those affirmative defense provisions purported to alter the jurisdiction of federal courts generally provided in the CAA to assess liability and impose penalties for violations of emission limits in private civil enforcement cases, and that the CAA did not provide authority for the EPA to do so. Consistent with the reasoning in the *NRDC v. EPA* court decision, the EPA has determined that it is also not appropriate under the CAA to alter the jurisdiction of the federal courts through affirmative defenses provisions in its Title V regulations, such as those contained in the emergency provisions of 40 CFR 71.6(g), and that such provisions are inconsistent with the CAA. In light of the above-described D.C. Circuit Court decision and the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, it is no longer appropriate to propose to include permit conditions modeled on affirmative defenses such as those contained in the emergency provisions of 40 CFR 71.6(g) in operating permits issued by the EPA.

Although the EPA views the Part 71 emergency provisions as discretionary (i.e., neither the statute nor the regulations mandate their inclusion in Part 71 permits), the EPA is considering whether to make changes to the Part 71 Permit Program regulations in order to ensure the EPA's regulations are consistent with the recent D.C. Circuit decisions; and if so, how best to make those changes. Until that time, as part of the normal permitting process, it is appropriate for the EPA permitting authorities to rely on the discretionary nature of the existing emergency provisions to choose not to continue to include permit terms modeled on those provisions in Part 71 permits that we are issuing in the first instance or renewing. By doing so, we are not only fulfilling the EPA's obligation to issue Title V permits consistent with the applicable requirements of the Act, but we will also help ensure that permittee's do not continue to rely on permit provisions that have been found legally invalid.

Accordingly, in this draft Part 71 renewal permit, the EPA is exercising its discretion to not include the "Emergency Provisions" located in permit condition III.O. in the existing effective Part 71 permit, in order to ensure the Part 71 permit is in compliance with the applicable requirements of the Act.

III. EPA Authority

Title V of the CAA requires that the EPA promulgate, administer, and enforce a federal operating permit program when a state does not submit an approvable program within the time frame set by Title V or does not adequately administer and enforce its EPA approved program. On July 1, 1996 (61 FR 34202), the EPA adopted regulations codified at 40 CFR part 71 setting forth the procedures and terms under which the agency would administer a federal operating permit program. These regulations were updated on February 19, 1999 (64 FR 8247) to incorporate the EPA's approach for issuing federal operating permits to stationary sources in Indian country.

As described in 40 CFR 71.4(a), the EPA will implement a Part 71 program in areas where a state, local, or tribal agency has not developed an approved Part 70 program. Unlike states, tribes are not required to

develop operating permits programs, though the EPA encourages tribes to do so. See, e.g., Indian Tribes: Air Quality Planning and Management (63 FR 7253, February 12, 1998) (also known as the "Tribal Authority Rule"). Therefore, within Indian country, the EPA will administer and enforce a Part 71 federal operating permit program for stationary sources until a tribe receives approval to administer their own operating permit program. The Crow Indian Tribe has not applied for or received approval to administer their own operating permit program, so the EPA administers Part 71 on the Indian country lands within the Crow Indian Reservation.

IV. Use of All Credible Evidence

Determinations of deviations, continuous or intermittent compliance status, or violations of the permit are not limited to the testing or monitoring methods required by the underlying regulations or this permit; other credible evidence (including any evidence admissible under the Federal Rules of Evidence) must be considered by the Permittee and the EPA in such determinations.

V. Public Participation

A. Public Notice

As described in 40 CFR 71.11(a)(5), all Part 71 draft operating permits shall be publicly noticed and made available for public comment. The public notice of permit actions and public comment period is described in 40 CFR 71(d).

There will be a 30-day public comment period for actions pertaining to a draft permit. Notification will be given for this draft permit by mailing a copy of the notice to the permit applicant, the affected state, tribal and local air pollution control agencies, the city and county executives, and the state and federal land managers which have jurisdiction over the area where the source is located. A notification will be provided to all persons who have submitted a request to be included on the mailing list.

If you would like to be added to our mailing list to be informed of future actions on these or other CAA permits issued in Indian country, please send an email using the link for the Region 8 CAA public comment opportunities provided at https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8, or send your name and address to the contact listed below:

Part 71 Permitting Lead
U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129

Public notice will be provided at https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 giving opportunity for public comment on the draft permit and the opportunity to request a public hearing.

B. Opportunity to Comment

Members of the public are given an opportunity to review a copy of the draft permit prepared by the EPA, the application, this Statement of Basis for the draft permit and all supporting materials for the draft permit. Copies of these documents are available at:

Dawson County Clerk's Office
207 West Bell St.
Glendive, MT 59330

and

Crow Indian Reservation
P.O. Box 159
Crow Agency, MT 59022
Contact: Connie Howe, Environmental Director, at (406) 638-3952 or connie.howe@crow-nsn.gov

and

U.S. Environmental Protection Agency, Region 8
1595 Wynkoop Street (8P-AR)
Denver, Colorado 80202-1129
Contact: Colin Schwartz, Environmental Scientist, at 303-312-6043 or schwartz.colin@epa.gov

All documents are available for review at the Region 8 office Monday through Friday from 8:00 a.m. to 4:00 p.m. (excluding federal holidays). Electronic copies of the draft permit, statement of basis and supporting permit record may also be viewed at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

Any interested person may submit written comments on the draft Part 71 operating permit during the public comment period to the Part 71 Permitting Lead at the address listed in Section A above, or by email using the instructions on the public comment opportunities web site address listed above. All comments will be considered and answered by the EPA in making the final decision on the permit. The EPA keeps a record of the commenters and of the issues raised during the public participation process.

Anyone, including the applicant, who believes any condition of the draft permit is inappropriate should raise all reasonable ascertainable issues and submit all arguments supporting their position by the close of the public comment period. Any supporting materials submitted must be included in full and may not be incorporated by reference, unless the material has already been submitted as part of the administrative record in the same proceeding or consists of state or federal statutes and regulations, EPA documents of general applicability or other generally available reference material.

The final permit will be a public record that can be obtained upon request. A statement of reasons for changes made to the draft permit and responses to comments received will be sent to all persons who comment on the draft permit. The final permit and response to comments document will also be available online at: https://www.epa.gov/caa-permitting/caa-permits-issued-epa-region-8. Anyone may request a copy of the final permit at any time by contacting the Tribal Air Permit Program at (800) 227–8917 or by sending an email to r8airpermitting@epa.gov.

C. Opportunity to Request a Hearing

A person may submit a written request for a public hearing to the Part 71 Permitting Lead, U.S. EPA Region 8, by stating the nature of the issues to be raised at the public hearing. Based on the number of hearing requests received, the EPA will hold a public hearing whenever it finds there is a significant degree of public interest in a draft operating permit. The EPA will provide public notice of the public hearing. If a public hearing is held, any person may submit oral or written statements and data concerning the draft permit.

D. Appeal of Permits

Within 30 days after the issuance of a final permit decision, any person who filed comments on the draft

permit or participated in the public hearing may petition to the Environmental Appeals Board (EAB) to review any condition of the permit decision. Any person who failed to file comments or participate in the public hearing may petition for administrative review, only if the changes from the draft to the final permit decision or other new grounds were not reasonably foreseeable during the public comment period. The 30-day period to appeal a permit begins with the EPA's service of the notice of the final permit decision.

The petition to appeal a permit must include a statement of the reasons supporting the review, a demonstration that any issues were raised during the public comment period, a demonstration that it was impracticable to raise the objections within the public comment period, or that the grounds for such objections arose after such a period. When appropriate, the petition may include a showing that the condition in question is based on a finding of fact or conclusion of law which is clearly erroneous; or, an exercise of discretion, or an important policy consideration that the EAB should review.

The EAB will issue an order either granting or denying the petition for review, within a reasonable time following the filing of the petition. Public notice of the grant of review will establish a briefing schedule for the appeal and state that any interested person may file an amicus brief. Notice of denial of review will be sent only to the permit applicant and to the person requesting the review. To the extent review is denied, the conditions of the final permit decision become final agency action.

A motion to reconsider a final order shall be filed within ten days after the service of the final order. Every motion must set forth the matters claimed to have been erroneously decided and the nature of the alleged errors. Motions for reconsideration shall be directed to the Administrator rather than the EAB. A motion for reconsideration shall not stay the effective date of the final order unless it is specifically ordered by the EAB.

E. Petition to Reopen a Permit for Cause

Any interested person may petition the EPA to reopen a permit for cause, and the EPA may commence a permit reopening on its own initiative.

The EPA will only revise, revoke and reissue, or terminate a permit for the reasons specified in 40 CFR 71.7(f) or 71.6(a)(6)(i). All requests must be in writing and must contain facts or reasons supporting the request. If the EPA decides the request is not justified, it will send the requester a brief written response giving a reason for the decision. Denial of these requests is not subject to public notice, comment, or hearings. Denials can be informally appealed to the EAB by a letter briefly setting forth the relevant facts.

Schwartz, Colin

From: Schwartz, Colin
Sent: Wednesday, May 31, 2017 10:16 AM
Subject: Notice of Public Comment Period – Draft Title V Operating Permit on the Crow Indian Reservation

In accordance with 40 CFR 71.8 and 71.11(d)(2), the U.S. Environmental Protection Agency Region 8 is hereby providing notification to all affected states and tribes of the issuance of the draft title V federal operating permit for the following source located on the Crow Indian Reservation:

Williston Basin Interstate Pipeline Company – Hardin Compressor Station

Part 71 Permit Contact – Colin Schwartz, (303)-312-6043

A copy of the draft permit and Statement of Basis may be obtained by contacting the Part 71 Permit Contact. The permit application and other supporting information pertinent to the permit decision are available for review at the following locations:

U.S. EPA Region 8
Air Program (8P-AR)
1595 Wynkoop St.
Denver, CO 80202

Crow Indian Tribe
P.O. Box 159
Crow Agency, MT 59022

Dawson County Clerk
207 West Bell St.
Glendive, MT 59330

Electronic copies of the draft permit and Statement of Basis may also be viewed online at: http://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8.

In accordance with §71.11(d)(2), EPA Region 8 is providing a 30-day period from June 14, 2017 to July 14, 2017, for public comment on this draft permit. Comments must be received by July 14, 2017, to be considered in the issuance of the final permit. If a public hearing is held regarding this permit, you will be sent a copy of the public hearing notice at least 30 days in advance of the hearing date.

Please submit any written recommendations you may have concerning the terms and conditions of this permit to me at the address listed above.

Sincerely,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From:	Schwartz, Colin
Sent:	Wednesday, May 31, 2017 10:16 AM
To:	'Linn, Jill'
Cc:	Fallon, Gail; Morales, Monica; Patefield, Scott; Smith, Claudia; connie.howe@crow-nsn.gov
Subject:	Draft Title V Operating Permit for Hardin Compressor Station
Attachments:	WBI Hardin CS Draft TV Permit.pdf; WBI Hardin CS Draft TV SOB.pdf; WBI Hardin CS Bulletin.pdf

Ms. Linn,

I have attached the requested draft permit, the accompanying Statement of Basis, and the public notice for the Hardin Compressor Station. We will also be posting the application, public notice, draft permit, Statement of Basis, and other supporting information in PDF format on our website at: https://www.epa.gov/caa-permitting/caa-permit-public-comment-opportunities-region-8 by the start of the public comment period.

In accordance with the regulations at 40 CFR 71.11(d), we are providing a 30-day period from June 14, 2017 to July 14, 2014 for public comment on this draft permit. Comments must be received by 5:00pm MDT July 14, 2014, to be considered in the issuance of the final permit.

Please submit any written comments you may have concerning the terms and conditions of this permit. You can send them directly to me at schwartz.colin@epa.gov, or to r8airpermitting@epa.gov. Should the EPA not accept any or all of these comments, you will be notified in writing and will be provided with the reasons for not accepting them.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

Schwartz, Colin

From: Linn, Jill <Jill.Linn@wbienergy.com>
Sent: Monday, January 30, 2017 7:43 AM
To: Schwartz, Colin
Subject: RE: Hardin Compressor Station
Attachments: removed.txt

Hi Colin,

Sorry for the delay. We estimated the horsepower of the unit based on manufacturer data for the same model used for gas compression as opposed to electric generation. Based on that information, we estimate that the horsepower of the engine would be about 137 HP. The engine is a 4SRB engine.

Let me know if you have any other questions as you work through the application.

Thank you,

Jill Linn
Environmental Manager
(O) (406) 359-7332
(M) (406) 939-5437
www.wbienergy.com

From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Thursday, January 26, 2017 12:12 PM
To: Linn, Jill
Subject: RE: Hardin Compressor Station

*** This is an EXTERNAL email. Exercise caution. ***

Hey Jill,

I was wondering if you had a chance to verify the generator engine horsepower?

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

From: Linn, Jill [mailto:Jill.Linn@wbienergy.com]
Sent: Friday, January 13, 2017 11:09 AM

To: Schwartz, Colin <Schwartz.Colin@epa.gov>
Subject: RE: Hardin Compressor Station

Hi Colin,

Thank you for following up with me on Hardin. I will verify the information you requested on the generator and get in touch with you next week. Have a good weekend!

Thank you,

Jill Linn
Environmental Manager
(O) (406) 359-7332
(M) (406) 939-5419
www.wbienergy.com

From: Schwartz, Colin [mailto:Schwartz.Colin@epa.gov]
Sent: Wednesday, January 11, 2017 3:32 PM
To: Linn, Jill
Subject: Hardin Compressor Station

*** This is an EXTERNAL email. Exercise caution. ***

Jill,

Matthew Langenfeld suggested that I contact you with any questions regarding the Title V permit for the Hardin Compressor Station. I am going through the process as we speak, however I was wondering if you could assist me with some information on the generator engine (GEN-1, Waukesha F1197G, 100kW): Do you happen to know if this is a four stroke rich burn or four stroke lean burn, and do you have the horsepower of the GEN-1 engine that is on site at Hardin Compressor Station?

Please feel free to contact me at any time.

Thank you,

Colin C. Schwartz
Environmental Scientist
Air Permits Division
US EPA Region 8- Denver, CO
303-312-6043

WBI ENERGY TRANSMISSION
An MDU Resources Group company

V-C-000001-2013.00
Title V Permit Renewal #2

WBI ENERGY TRANSMISSION, INC.
2010 Montana Avenue
Glendive, MT 59330
(406) 359-7200
www.wbienergy.com

April 12, 2013

U.S. Environmental Protection Agency
Part 71 Permit Contact
Air and Radiation Program, 8P-AR
1595 Wynkoop Street
Denver, Co, 80202-1129

Re: WBI Energy Transmission, Inc.
Hardin Compressor Station (Part 71 Permit No. V-C-0001-06.00)
Permit Application Renewal

Enclosed are the following forms and associated information for the Hardin Compressor Station:

- Truth, Accuracy, and Completeness Form (CTAC - EPA Form 5900-02)
- General Information and Summary (GIS - EPA Form 5900-79)
- Potential To Emit (PTE - EPA Form 5900-85)
- Emission Unit Description For Fuel Combustion Sources (EDU-1 - EPA Form 5900-80)
- Emissions Calculations (EMISS - EPA Form 5900-84)
- Insignificant Emissions (IE – EPA Form 5900-83)
- Company Information (Calculations, Map, and Alternative Operating Scenario)

If you require more information, please contact me.

Sincerely,

WBI Energy Transmission, Inc.

Ron Lowney

Ron Lowney
Senior Environmental Scientist
Office: (406)-359-7295 or email: ronlowney@wbienergy.com

Enc.

PC:

- Carson Coate, US EPA Montana Office, 10 West 15th Street, Helena, MT., 59626
- File

Permit Application Forms

40 CFR PART 71
Federal Operating Permits Program

US EPA
APRIL, 2013

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

U.S. EPA - REGION 8 OFFICE
(PART 71 PERMIT CONTACT)
AIR & RADIATION PROGRAM
8P-AR, 1595 Wynkop Street,
Denver , CO 80202-1129

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X [signature] ☐ Agent ☐ Addressee

B. Received by (Printed Name) | C. Date of Delivery 4-15-13

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☑ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number (Transfer from service label) 7011 2970 0001 8528 6021

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540

7011 2970 0001 8528 6021

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	$ 2.92
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage &	$ 8.57

WBI

HENDRIVE MT 593
Postmark Here
APR 2 2013

Sent To
Street, Apt. No.; or PO Box No.
City, State, ZIP+4

U.S. EPA - Region 8 Office (Part 71 Permit Contact), Air and Radiation Program, 8P-AR, 1595 Wynkop Street, Denver, CO 80202-1129
Re: Title V Permit Renewal
(Hardin Compressor Station)

PS Form 3800, A... See Reverse for Instructions

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 6/30/2015

Federal Operating Permit Program (40 CFR Part 71)

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS (CTAC)

This form must be completed, signed by the "Responsible Official" designated for the facility or emission unit, and sent with each submission of documents (i.e., application forms, updates to applications, reports, or any information required by a part 71 permit).

A. Responsible Official

Name: (Last) Fradenburgh (First) Scott (MI) ____

Title Director of Pipeline Operations

Street or P.O. Box 2010 Montana Avenue

City Glendive State MT ZIP 59330 - ____

Telephone (406) 359 - 7200 Ext. ____ Facsimile (406) 359 - 7225 ____

B. Certification of Truth, Accuracy and Completeness (to be signed by the responsible official)

I certify under penalty of law, based on information and belief formed after reasonable inquiry, the statements and information contained in these documents are true, accurate and complete.

Name (signed) _____

Name (typed) Scott Fradenburgh Date: 4/11/2013

/ ____

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

GENERAL INFORMATION AND SUMMARY (GIS)

A. Mailing Address and Contact Information

Facility name WBI - Hardin Compressor Station

Mailing address: Street or P.O. Box 2010 Montana Avenue

City Glendive State MT ZIP 59330 -

Contact person: Jill Linn Title Senior Environmental Scientist

Telephone (406) 359 - 7332 Ext.

Facsimile (406) 359 - 7273

B. Facility Location

Temporary source? ___Yes X No Plant site location SW 1/4, SE 1/4 of Section 17, Township 1 South, Range 34 East

City Hardin State MT County Big Horn EPA Region 8

Is the facility located within:

Indian lands? X YES ___ NO OCS waters? ___YES X NO

Non-attainment area? ___ YES X NO If yes, for what air pollutants? _____

Within 50 miles of affected State? __ YES X NO If yes, What State(s)? _____

C. Owner

Name WBI Energy Transmission, Inc. Street/P.O. Box 2010 Montana Avenue

City Glendive State MT ZIP 59330 -

Telephone (406) 359 - 7200 Ext

D. Operator

Name WBI Energy Transmission, Inc. Street/P.O. Box 2010 Montana Avenue

City Glendive State MT ZIP 59330 -

Telephone (406) - 359 Ext 7200

E. Application Type

Mark only one permit application type and answer the supplementary question appropriate for the type marked.

___Initial Permit _X_ Renewal ___ Significant Mod ___ Minor Permit Mod(MPM)

___ Group Processing, MPM ___ Administrative Amendment

For initial permits, when did operations commence? _____ /_____ /_____

For permit renewal, what is the expiration date of current permit? 11 / 2 /2013

F. Applicable Requirement Summary

Mark all types of applicable requirements that apply.

___ SIP ___ FIP/TIP ___ PSD ___Non-attainment NSR

___ Minor source NSR ___ Section 111 ___ Phase I acid rain ___Phase II acid rain

_X_ Stratospheric ozone ___ OCS regulations ___ NESHAP _X_ Sec. 112(d) MACT

___ Sec. 112(g) MACT ___ Early reduction of HAP ___ Sec 112(j) MACT ___ RMP [Sec.112(r)]

___ Tank Vessel requirements, sec. 183(f)) ___ Section 129 Standards/Requirement

___ Consumer / comm.. products, ' 183(e) ___ NAAQS, increments or visibility (temp. sources)

Has a risk management plan been registered? ___YES _X_NO Regulatory agency NA

Phase II acid rain application submitted? ___YES _X_NO If yes, Permitting authority NA

G. Source-Wide PTE Restrictions and Generic Applicable Requirements

Cite and describe any emissions-limiting requirements and/or facility-wide "generic" applicable requirements.

Facility-Wide Requirements include General Recordkeeping Requirements [40 CFR 71.6(a)(3)(ii)]; General Reporting Requirements [40 CFR 71.6(a)(3)(iii)]; Stratospheric Ozone and Climate Protection, Recycling and Emissions Reduction [40 CFR part 82, subparts F and G]; Alternative Operating Scenarios [40 CFR 71.6(a)(9)]; and Permit Shield [40 CFR 71.6(f)(3)].

H. Process Description

List processes, products, and SIC codes for the facility.

Process	Products	SIC
Natural Gas Compression	Pipeline Transmission of Natural Gas	4922

I. Emission Unit Identification

Assign an emissions unit ID and describe each emissions unit at the facility. Control equipment and/or alternative operating scenarios associated with emissions units should by listed on a separate line. Applicants may exclude from this list any insignificant emissions units or activities.

Emissions Unit ID	Description of Unit
Unit 1	Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine
Unit 2	Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine
Unit 3	Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine
Unit 4	Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine
Unit 5	Waukesha Model F1197G, 100kW Generator Set

J. Facility Emissions Summary

Enter potential to emit (PTE) for the facility as a whole for each air pollutant listed below. Enter the name of the single HAP emitted in the greatest amount and its PTE. For all pollutants stipulations to major source status may be indicated by entering "major" in the space for PTE. Indicate the total actual emissions for fee purposes for the facility in the space provided. Applications for permit modifications need not include actual emissions information.

NOx 399 tons/yr VOC 12 tons/yr SO2 0 tons/yr

PM-10 1 tons/yr CO 654 tons/yr Lead 0 tons/yr

Total HAP _____ tons/yr

Single HAP emitted in the greatest amount 2 PTE _____ tons/yr

Total of regulated pollutants (for fee calculation), Sec. F, line 5 of form FEE _____ tons/yr

K. Existing Federally-Enforceable Permits

Permit number(s) V-C-0001-06.00 Permit type Title V Permitting authority EPA

Permit number(s) _____ Permit type _____ Permitting authority _____

L. Emission Unit(s) Covered by General Permits

Emission unit(s) subject to general permit _____

Check one: ___ Application made ___ Coverage granted

General permit identifier _____ Expiration Date ____/____/____

M. Cross-referenced Information

Does this application cross-reference information? ___ YES X NO (If yes, see instructions)

INSTRUCTIONS FOLLOW

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

POTENTIAL TO EMIT (PTE)

For each unit with emissions that count towards applicability, list the emissions unit ID and the PTE for the air pollutants listed below and sum them up to show totals for the facility. You may find it helpful to complete form **EMISS** before completing this form. Show other pollutants not listed that are present in major amounts at the facility on attachment in a similar fashion. You may round values to the nearest tenth of a ton. Also report facility totals in section **J** of form **GIS**.

Emissions Unit ID	Regulated Air Pollutants and Pollutants for which the Source is Major (tons/yr)						
	NOx	VOC	SO2	PM10	CO	Lead	HAP
Unit 1	95.6	2.8	0.01	0.3	159.3	0.0	0.53
Unit 2	95.6	2.8	0.01	0.3	159.3	0.0	0.53
Unit 3	95.6	2.8	0.01	0.3	159.3	0.0	0.53
Unit 4	95.6	2.8	0.01	0.3	159.3	0.0	0.53
Gen 1	16.8	0.3	0.0	0.06	16.8	0.0	0.12
FUG		0.19					
FACILTY TOTALS	399	12	0	1	654	0	2

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID Unit 1 Description Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200202

B. Emissions Unit Description

Primary use Drives Natural Gas Compressor Temporary Source ___Yes X No

Manufacturer Ingersoll-Rand Model No. 62 KVG

Serial Number 62NL846 Installation Date ___/___/1954

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas		Negligible	1000 Btu/Scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas		5.94 mcf	52.034 mmscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date____/____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft)	23.0	Inside stack diameter (ft)	0.83
Stack temp(°F)	970.0	Design stack flow rate (ACFM)	
Actual stack flow rate (ACFM)	4300.0	Velocity (ft/sec)	131.4

EPA United States Environmental Protection Agency

OMB No. 2060-0336, Approval Expires 06/30/2015

Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID Unit 2 Description Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200202

B. Emissions Unit Description

Primary use Drives Natural Gas Compressor Temporary Source ___Yes X No

Manufacturer Ingersoll-Rand Model No. 62NL847

Serial Number _____ Installation Date ___/___/1954

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas		Negligible	1000 BTU/Scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas		5.94 mcf	52.034 mmscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date____/____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft)	23.0	Inside stack diameter (ft)	0.83
Stack temp(°F)	970.0	Design stack flow rate (ACFM)	
Actual stack flow rate (ACFM)	4300.0	Velocity (ft/sec)	131.4

United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID Unit 3 Description Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200202

B. Emissions Unit Description

Primary use Drives Natural Gas Compressor Temporary Source ___Yes X No

Manufacturer Ingersoll-Rand Model No. 62 KVG

Serial Number 62NL848 Installation Date ___/___/1954

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s) Natural Gas Standby fuel type(s) NA

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas		Negligible	1000 Btu/Scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas		5.94 mcf	52.034 mmscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date____/____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft)	23.0	Inside stack diameter (ft)	0.83
Stack temp(°F)	970.0	Design stack flow rate (ACFM)	
Actual stack flow rate (ACFM)	4300.0	Velocity (ft/sec)	131.4

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID Unit 4 Description Ingersoll-Rand 62 KVG 660 BHP Reciprocating Engine

SIC Code (4-digit) 4922 SCC Code 20200202

B. Emissions Unit Description

Primary use Drives Natural Gas Compressor Temporary Source ___Yes X No

Manufacturer Ingersoll-Rand Model No. 62 KVG

Serial Number 62NL849 Installation Date ___/___/1954

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s)_____ Standby fuel type(s)_____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas		Negligible	1000 Btu/Scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas		5.94 mcf	52.034 mmscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date____/____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft)	23.0	Inside stack diameter (ft)	0.83
Stack temp(°F)	970.0	Design stack flow rate (ACFM)	
Actual stack flow rate (ACFM)	4300.0	Velocity (ft/sec)	131.4

United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION UNIT DESCRIPTION FOR FUEL COMBUSTION SOURCES (EUD-1)

A. General Information

Emissions unit ID Gen 1 Description Waukesha Model F1197G Generator Set

SIC Code (4-digit) 4911 SCC Code 20200202

B. Emissions Unit Description

Primary use Back-up Electric Power Supply Temporary Source ___Yes X No

Manufacturer Waukesha Model No. F1197G

Serial Number 1109831 Installation Date ___/___/1999

Boiler Type: ___ Industrial boiler ___ Process burner ___ Electric utility boiler

Other (describe) _____

Boiler horsepower rating_____ Boiler steam flow (lb/hr)_____

Type of Fuel-Burning Equipment (coal burning only):

___ Hand fired ___Spreader stoker ___Underfeed stoker ___Overfeed stoker

___ Traveling grate ___Shaking grate ___Pulverized, wet bed ___ Pulverized, dry bed

Actual Heat Input _____MM BTU/hr Max. Design Heat Input _____MM BTU/hr

C. Fuel Data

Primary fuel type(s)_____ Standby fuel type(s)_____

Describe each fuel you expected to use during the term of the permit.

Fuel Type	Max. Sulfur Content (%)	Max. Ash Content (%)	BTU Value (cf, gal., or lb.)
Natural Gas		Negligible	1000 Btu/Scf

D. Fuel Usage Rates

Fuel Type	Annual Actual Usage	Maximum Usage	
		Hourly	Annual
Natural Gas		1.305 mcf	11.432 mmscf

E. Associated Air Pollution Control Equipment

Emissions unit ID_____ Device type_____

Air pollutant(s) Controlled_____ Manufacturer_____

Model No._____ Serial No._____

Installation date____/____/_____ Control efficiency (%) _____

Efficiency estimation method_____

F. Ambient Impact Assessment

This information must be completed by temporary sources or when ambient impact assessment is an applicable requirement for this emissions unit (this is not common).

Stack height (ft) 19.0	Inside stack diameter (ft) 0.33
Stack temp(°F) 800.0	Design stack flow rate (ACFM) ____
Actual stack flow rate (ACFM) 960.0	Velocity (ft/sec) 187.0

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit 1

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Nitrogen Oxides (NOx)	95.6			
Sulfur Dioxide (SO2)	0.01			
Volatile Organic Compound (VOC)	2.8			
Carbon Monoxide (CO)	159.3			
Respirable Particulate Matter (PM10)	0.3			
HAP Formaldehyde (CH2O)	0.40			50000
Total Organic Carbon (TOC)	28.0			

EPA United States Environmental Protection Agency

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID UNIT 2

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Nitrogen Oxides (NOx)	95.6			
Sulfur Dioxide (SO2)	0.01			
Volatile Organic Compound (VOC)	2.8			
Carbon Monoxide (CO)	159.3			
Respirable Particulate Matter (PM10)	0.3			
HAP Formaldehyde (CH2O)	0.40			50000
Total Organic Carbon (TOC)	28.0			

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Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit 3

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Nitrogen Oxides (NOx)	95.6			
Sulfur Dioxide (SO2)	0.01			
Volatile Organic Compound (VOC)	2.8			
Carbon Monoxide (CO)	159.3			
Respirable Particulate Matter (PM10)	0.3			
HAP Formaldehyde (CH2O)	0.40			50000
Total Organic Carbon (TOC)	28.0			

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EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Unit 4

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Nitrogen Oxides (NOx)	95.6			
Sulfur Dioxide (SO2)	0.01			
Volatile Organic Compound (VOC)	2.8			
Carbon Monoxide (CO)	159.3			
Respirable Particulate Matter (PM10)	0.3			
HAP - Formaldehyde (CH2O)	0.40			50000
Total Organic Carbon (TOC)	28.0			

Federal Operating Permit Program (40 CFR Part 71)

EMISSION CALCULATIONS (EMISS)

Calculate potential to emit (PTE) for applicability purposes and actual emissions for fee purposes for each emissions unit, control device, or alternative operating scenario identified in section I of form **GIS**. If form **FEE** does not need to be submitted with the application, do not calculate actual emissions.

A. Emissions Unit ID Gen 1

B. Identification and Quantification of Emissions

First, list each air pollutant that is either regulated at the unit or present in major amounts, then list any other regulated pollutant (for fee calculation) not already listed. HAP may be simply listed as "HAP." Next, calculate PTE for applicability purposes and actual emissions for fee purposes for each pollutant. Do not calculate PTE for air pollutants listed solely for fee purposes. Include all fugitives for fee purposes. You may round to the nearest tenth of a ton for yearly values or tenth of a pound for hourly values.

Air Pollutants	Emission Rates			CAS No.
	Actual Annual Emissions (tons/yr)	Potential to Emit		
		Hourly (lb/hr)	Annual (tons/yr)	
Nitrogen Oxides (NOx)	16.8			
Sulfur Dioxide (SOx)	0.01			
Volatile Organic Compound (VOC)	0.3			
Carbon Monoxide (CO)	16.8			
Respirable Particulate Matter (PM10)	0.06			
HAP - Formaldehyde (CH2O)	0.09			50000
Total Organic Carbon (TOC)	2.8			

Table 3 - Potential to Emit in Tons per Year
Williston Basin Interstate Energy Transmission, Inc.
Hardin Compressor Station

Emission Unit ID	Regulated Air Pollutants							
	NO_x (tpy)	VOC (tpy)	SO_2 (tpy)	PM_{10} (tpy)	CO (tpy)	Lead (tpy)	HAP (tpy)	CH_2O (tpy)
Unit 1	95.6	2.8	0.01	0.3	159.3	0.0	0.53	0.53
Unit 2	95.6	2.8	0.01	0.3	159.3	0.0	0.53	0.53
Unit 3	95.6	2.8	0.01	0.3	159.3	0.0	0.53	0.53
Unit 4	95.6	2.8	0.01	0.3	159.3	0.0	0.53	0.53
GEN 1	16.8	0.3	0.00	0.06	16.8	0.0	0.12	0.12
IEUs and Fugitive Emissions*	< 2	0.19	< 2	< 2	< 2	< 2	< 0.5	0
TOTAL	399	11.7	0.04	1.3	654	0	2.24	2.24

* Fugitive emission sources include connections, flanges, openended lines, pumps, valves, etc. and were estimated using American Petroleum Institute (API) emission factors

NO_x - oxides of nitrogen
VOC - volatile organic compounds
SO_2 - sulfur dioxide
PM_{10} - particulate matter with a diameter 10 microns or less
CO - carbon monoxide
HAP - hazardous air pollutants (see Clean Air Act Section 112(b))
CH_2O – formaldehyde
IEUs – Insignificant Emission Units

The PTE of regulated pollutants for the facility as a whole are as follows:

Nitrogen Oxides (NOx) – 399 tpy
Carbon Monoxide (CO) – 654 tpy
Volatile Organic Compounds (VOC) – 11.7 tpy
Small Particulates (PM_{10}) – 1.3 tpy
Sulfur Dioxide (SO_2) – 0.04 tpy
Total Hazardous Air Pollutants (HAPs) – 2.24 tpy
Largest Single HAP (formaldehyde, CH_2O) – 2.24 tpy

Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
45	*Valves - on station piping, with potential fugitive natural gas emissions due to leakage. The listed HAP's emissions are only minor constituents of natural gas.*	< 2 ton/year	< 0.5 ton/year
149	*Flanges - on station piping, with potential fugitive natural gas emissions due to leakage. The listed HAP's emissions are only minor constituents of natural gas.*	< 2 ton/year	< 0.5 ton/year
10	*Open-ended lines - on station piping, with potential fugitive natural gas emissions due to leakage. The listed HAP's emissions are only minor constituents of natural gas.*	< 2 ton/year	< 0.5 ton/year
8	*Compressor seals - on station compressors, with potential fugitive natural gas emissions due to leakage. The listed HAP's emissions are only minor constituents of natural gas.*	< 2 ton/year	< 0.5 ton/year
10	*Pressure relief valves - on station piping, with potential fugitive natural gas emissions due to leakage. The listed HAP's emissions are only minor constituents of natural gas.*	< 2 ton/year	< 0.5 ton/year
1	*Natural gas-fired domestic water heater (30,000 Btu/hr,*	< 2 ton/year	< 0.5 ton/year
1	*Natural gas-fired domestic water heater (40,000 btu/hr)*	< 2 ton/year	< 0.5 ton/year
1	*Natural gas-fired shop heater (70,000 btu/hr)*	< 2 ton/year	< 0.5 ton/year
1	*Natural gas-fired auxiliary building heater (75,000 btu/hr)*	< 2 ton/year	< 0.5 ton/year
1	*Natural gas-fired furnace (50,000 Btu/hr)*	< 2 ton/year	< 0.5 ton/year
1	*Ethylene Glycol storage tank (1,000 gallons)*	< 2 ton/year	< 0.5 ton/year
1	*Ethylene Glycol storage tank (1,200 gallons)*	< 2 ton/year	< 0.5 ton/year
1	*Ethylene Glycol /water storage tank (3,200 gallons)*	< 2 ton/year	< 0.5 ton/year
1	*Methanol storage tank (500 gallons)*	< 2 ton/year	< 0.5 ton/year
1	*Waste-water tank (1,000 gallons)*	< 2 ton/year	< 0.5 ton/year
1	*Slop tank (1,000 gallons)*	< 2 ton/year	< 0.5 ton/year

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Federal Operating Permit Program (40 CFR Part 71)

INSIGNIFICANT EMISSIONS (IE)

On this page list each insignificant activity or emission unit. In the "number" column, indicate the number of units in this category. Descriptions should be brief but unique. Indicate which emissions criterion of part 71 is the basis for the exemption.

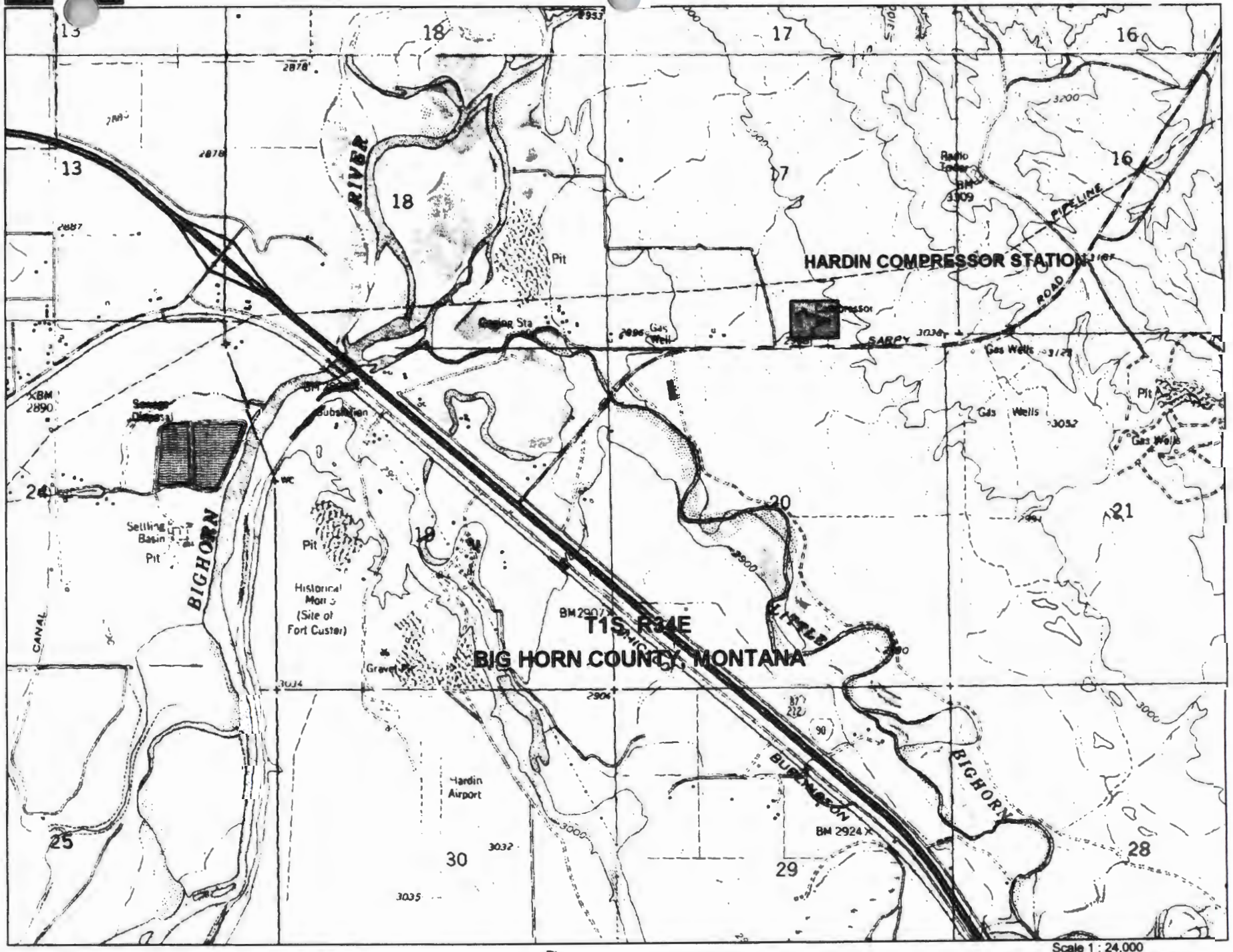
Number	Description of Activities or Emissions Units	RAP, except HAP	HAP
1	*Used oil tank (2,000 gallon)*	< 2 ton/year	< 0.5 ton/year
1	*Waste-water tank (2,000 gallon)*	< 2 ton/year	< 0.5 ton/year
1	*Condensate tank (2,000 gallon)*	< 2 ton/year	< 0.5 ton/year
1	*Fresh-water tank (6,000 gallon)*	< 2 ton/year	< 0.5 ton/year
1	*Office air conditioning unit, installed 1998*	< 2 ton/year	< 0.5 ton/year
1	*In-plant vehicle traffic*	< 2 ton/year	< 0.5 ton/year
1	*Repair and maintenance activities*	< 2 ton/year	<0.5 ton/year

Hardin Facility

Using AP-42 Emissions factors:

For Unit 1:			
	Formaldehyde (TPY) =((0.0205 lb/MMBtu)(5.94 MMBtu/hr)(CY hrs))/(2000 lb/ton)	=	0.53 ton/yr
For Unit 2:			
	Formaldehyde (TPY) =((0.0205 lb/MMBtu)(5.94 MMBtu/hr)(CY hrs))/(2000 lb/ton)	=	0.53 ton/yr
For Unit 3:			
	Formaldehyde (TPY) =((0.0205 lb/MMBtu)(5.94 MMBtu/hr)(CY hrs))/(2000 lb/ton)	=	0.53 ton/yr
For Unit 4:			
	Formaldehyde (TPY) =((0.0205 lb/MMBtu)(5.94 MMBtu/hr)(CY hrs))/(2000 lb/ton)	=	0.53 ton/yr
For Gen 1:			
	Formaldehyde (TPY) =((0.0205 lb/MMBtu)(1.305 MMBtu/hr)(CY hrs))/(2000 lb/ton)	=	0.12 ton/yr
		Total Formaldehyde =	2.25 ton/yr

Note: PTE for Formaldehyde was calculated using current AP-42 emissions factors, while all other PTE calcualtions (Criteria Pollutants) were left as initially calculated (i.e. permitted), per the application instructions. The PTE of the Formaldehyde (HAPS) was calculated using the current AP-42 emissions factors and results in a slightly larger PTE calculation, which was done to show a worst case senario by the company. However, the result makes no practical diference when rounded to the nearest ton, per the application instructions for PTE. The other HAPS (Acetaldhyde, Acrolein, Benzene, Toluene, and Xylenes) are the same as previously reported (≈ 0.1 tpy each).



Scale 1 : 24,000

Alternative Operating Scenario

a. Startup/shutdown

An alternative operating scenario is introduced when a shut-down/start-up sequence is initiated. This short-term duration operating mode is required due to emergency, maintenance or changes in transportation volume demand. When such a sequence is initiated for maintenance purposes, the system component(s) requiring repair is (are) isolated by closing appropriate inlet and discharge valves. Subsequent to component isolation, internal pressure is dissipated to atmosphere through a relief/blow-down valve. The compressor themselves are relieved of internal pressure through a vent stack after a unit shutdown to facilitate subsequent startup. Unit startup involves purging of the compressor cylinders and bottles. Also, an emergency safety feature at this facility mandated by the Department of Transportation (DOT) consists of an emergency shutdown (ESD) system. Block valves close to isolated the entire facility during an EDS sequence, which can be triggered either manually or by atmospheric gas detection, and facility pressure is relieved to atmosphere. The DOT requires one ESD trial per year in order to confirm integrity of the system.

Quantification of expected emissions is impractical due to the variable in frequency and duration of the triggered events. These emissions are comprised entirely of pipeline quality natural gas consisting of primarily methane, ethane, and propane to which no standard applies.

b. Swing engines

Periodically, major overhauls of compressor engines are necessary as either preventative maintenance (bases on total hours of operation or diagnostic analysis) or in response to a malfunction. In certain instances, this is most effectively accomplished through the use of a swing engine. In such an instance, the existing engine will be replaced by a comparable unit. Provided this physical change does not constitute a major modification, no pre-notification or permit alterations will be necessary. The company will include written notification of the change with the compliance report for a period in which the change occurred.