



**Statement of Basis**

**Title V Air Quality Operating Permit**

**NorthWestern Energy  
Clark, South Dakota**

**South Dakota Department of Environment and Natural Resources**

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## 1.0 Background

Northwestern Public Service Company's Title V air quality operating permit #28.0801-18 was originally issued on September 26, 1996 and expired on September 26, 2001. The South Dakota Department of Environment and Natural Resources issued a renewal on November 18, 2004 which had an expiration date of November 18, 2009. The department issued a renewal on August 9, 2009 which has an expiration date of August 9, 2014. On January 29, 2014 a request for renewal of the permit was submitted to the department.

The primary Source Industrial Code (SIC) listed on the application for this facility was 4911 - establishments engaged in the generation, transmission, and/or distribution of electric energy for sale. NorthWestern Energy's Clark plant provides peak electrical generation. The facility is on call to operate, as needed, the diesel generator. The generator operates with distillate fuel (diesel) as the fuel source.

Table 1-1 provides a list of equipment and processes that will be reviewed for the renewal application.

**Table 1-1 – Equipment Information**

<b>Unit</b>	<b>Description</b>	<b>Maximum Operating Rate</b>	<b>Control Device</b>
<b>#1</b>	Generator #1 – 1970 Fairbanks – Morse diesel engine generator, model number 38TDD 1/8 869078.	2,750 kilowatts	None applicable
<b>#2</b>	Tank #1 –1970 aboveground diesel storage tank.	9,400 gallons	None applicable

## 2.0 New Source Performance Standards

The department reviewed the new source performance standards (NSPS) in 40 CFR Part 60 and determined the following NSPS may be applicable to NorthWestern Energy - Clark.

### 2.1 Standards Applicable to Stationary Compression Ignition Engines

40 CFR, Part 60, Subpart IIII is applicable to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that:

1. Commence construction after July 11, 2005 where the stationary CI ICE are manufactured after April 1, 2006 and are not fire pump engines; or
2. Modify or reconstruct their stationary CI ICE after July 11, 2005.

In accordance with 40 CFR §60.4219, a compression ignition means a type of stationary internal combustion engine that is not a spark ignition engine - an engine that combusts gasoline, natural

gas or liquefied petroleum. NorthWestern Energy's diesel engine generator is considered a compression ignition engine because its fuel source is distillate fuel.

NorthWestern Energy's diesel engine generator was constructed in 1970; therefore, Subpart IIII is not applicable.

## **2.2 Standards for Stationary Spark Ignition Engines**

Subpart JJJJ is applicable to owners and operators of stationary spark ignition (SI) internal combustion engines (ICE) that commence construction after June 12, 2006, where the stationary SI ICE are manufactured:

1. On or after July 1, 2007, for engines with a maximum engine power greater than or equal to 500 horsepower (except lean burn engines with a maximum engine power greater than or equal to 500 horsepower and less than 1,350 horsepower);
2. On or after January 1, 2008, for lean burn engines with a maximum engine power greater than or equal to 500 horsepower and less than 1,350 horsepower;
3. On or after July 1, 2008, for engines with a maximum engine power less than 500 horsepower;
4. On or after January 1, 2009, for emergency engines with a maximum engine power greater than 19 kilowatts (25 horsepower); or
5. Owners and operators of stationary SI ICE that commence modification or reconstruction after June 12, 2006.

NorthWestern Energy's diesel engine generator is a compression ignition engine and is not applicable to Subpart JJJJ.

## **2.3 Standards Applicable to Tanks**

There are three New Source Performance Standards for tanks. The three standards are applicable to the following tanks:

1. 40 CFR Part 60, Subpart K: applicable to storage vessels of petroleum liquids constructed, reconstructed or modified after June 11, 1973, and before May 19, 1978, where the tank has a capacity greater than or equal to 151,412 liters (40,000 gallons) that is used to store volatile organic liquids.
2. 40 CFR Part 60, Subpart Ka: applicable to storage vessels of petroleum liquids constructed, reconstructed or modified after May 18, 1978 and before July 24, 1984 where the tank has a capacity greater than or equal to 151,416 liters (40,000 gallons) that is used to store volatile organic liquids.
3. 40 CFR Part 60, Subpart Kb: applicable to storage vessels of petroleum liquids constructed, reconstructed or modified after July 23, 1984 where the tank has a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids.

Although the date of construction of the tank is unknown, it can be assumed that the tank was constructed at the same time as the installation of the diesel engine generator, 1970. Therefore, Subpart K, Ka and Kb are not applicable to the storage tanks.

## **2.4 Other NSPS Standards**

The department reviewed the New Source Performance Standards and determined there are no other applicable standards.

## **3.0 New Source Review**

ARSD 74:36:10:01 states that New Source Review (NSR) regulations apply to areas of the state which are designated as nonattainment pursuant to the Clean Air Act for any pollutant regulated under the Clean Air Act. NorthWestern Energy's facility is located in Clark, South Dakota, which is in attainment or unclassifiable for all the pollutants regulated under the Clean Air Act. Therefore, NorthWestern Energy is not subject to NSR review.

## **4.0 Prevention of Significant Deterioration**

Any stationary source which emits, or has the potential to emit, 250 tons per year or more of any regulated NSR air pollutant is considered a major source and subject to prevention of significant deterioration (PSD) requirements under ARSD 74:36:09 – 40 CFR §52.21(b)(1). Any stationary source which emits or has the potential to emit 100 tons per year or more of any regulated NSR air pollutant and is subject to one of the 28 named PSD source categories is subject to PSD requirements in ARSD 74:36:09 – 40 CFR §52.21(b)(1).

1. Total suspended particulate (PM);
2. Particulate matter with a diameter less than or equal to 10 microns (PM10);
3. Particulate matter with a diameter less than or equal to 2.5 microns (PM2.5);
4. Sulfur dioxide (SO<sub>2</sub>);
5. Nitrogen oxides (NO<sub>x</sub>);
6. Carbon monoxide (CO);
7. Ozone – measured as volatile organic compounds (VOCs);
8. Lead;
9. Greenhouse gases (carbon dioxide, nitrous oxide, methane, etc.)
10. Fluorides;
11. Sulfuric acid mist;
12. Hydrogen sulfide;
13. Reduced sulfur compounds; and
14. Total reduced sulfur.

If the source is considered one of the 28 named PSD source categories listed in Section 169 of the federal Clean Air Act, the major source threshold is 100 tons per year of any regulated air

pollutant, except for greenhouse gases. The major source threshold for all other sources is 250 tons per year of any regulated air pollutant, except for greenhouse gases.

According to the Clean Air Act, once a pollutant is regulated under any part of the Act, (as was the case with greenhouse gas emissions after the motor vehicle regulations were finalized in March 2010) major new sources or major modifications are subject to the PSD program and Title V air quality operating permit program. Under the Clean Air Act, PSD and Title V air quality operating permits are required for all sources that emit a regulated air pollutant above 100 or 250 tons per year, depending on the source. This threshold, if applied to greenhouse gases, would greatly increase the number of facilities requiring a PSD review or Title V air quality operating permit. Based on administrative necessity, EPA increased these thresholds through the “Tailoring Rule.”

On May 13, 2010, EPA issued the final version of the “Tailoring Rule” for greenhouse gas emissions. The major source threshold for greenhouse gases is listed below:

1. New PSD source because of a criteria air pollutant, the major source threshold for greenhouse gases is 75,000 tons per year of carbon dioxide equivalent or more;
2. New PSD source if greenhouse gas emissions are 100,000 tons per year of carbon dioxide equivalent or more;
3. For an existing PSD source because of a criteria air pollutant, a major modification for greenhouse gases is an increase of 75,000 tons per year of carbon dioxide equivalent or more;
4. For an existing non-PSD source that has the potential to emit 100,000 tons per year of carbon dioxide equivalent emissions or more, a major modification for greenhouse gases is an increase of 75,000 tons per year of carbon dioxide equivalent or more; and
5. In addition to subsection (2) and (4), a specific greenhouse gas, without calculating the carbon dioxide equivalent, also needs to emit greater than 100 or 250 tons per year, whichever is applicable, to be regulated.

#### **4.1 Potential Emissions**

The department uses stack test results to determine air emissions whenever stack test data is available from the source or a similar source. When stack test results are not available, the department relies on manufacturing data, material balance, EPA’s Compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1) document, the applicant’s application, or other methods to determine potential air emissions.

Potential emissions for each applicable pollutant are calculated from the maximum design capacity listed in the application and assuming the unit operates every hour of every day of the year, while using the fuel that will emit the greatest emissions. Potential emissions are not realistic of the actual emissions and are used only to identify which air quality permit and requirements NorthWestern Energy is required to meet.

## 4.2 Stationary Internal Combustion Sources – Criteria Air Pollutants

The maximum generating capacity of the diesel engine is 2,750 kilowatts (approximately 4,000 horsepower). An engine with a capacity greater than 600 horsepower is defined as a large diesel engine. The emission factors listed below are derived from AP-42 Tables 3.4-1, 3.4-3, and 3.4-4 (10/96) for Large Stationary Diesel and All Stationary Dual-fuel Engines.

**Table 4-1 – Emission Factors**

	Pollutant						
	TSP	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC
<b>Distillate Oil (pounds/MMBtus)</b>	0.0697 <sup>c</sup>	0.0573 <sup>a</sup>	0.0573 <sup>a</sup>	1.01S <sub>1</sub> <sup>b</sup>	3.2	0.85	0.082

<sup>a</sup> – Total PM-10 is the sum of filterable particulate less than 10 µm aerodynamic diameter and condensable particulate.

<sup>b</sup> – Assumes that all sulfur in the fuel is converted to SO<sub>2</sub>. S<sub>1</sub> = % sulfur in fuel oil.

<sup>c</sup> – Total particulate is the sum of the total filterable particulate and condensable particulate.

## 4.3 Tanks

The emissions factors for the tanks are derived from computer software program Tanks 4.0.9

## 4.4 Potential Emission Calculations

Potential emissions for each applicable pollutant are calculated from the maximum design capacity listed in the application and assuming the unit operates every hour of every day of the year. NorthWestern Energy does not have control equipment associated with the diesel engine; therefore, the potential uncontrolled and controlled emissions are the same.

Equation 4-1, the maximum designed operating rate in kilowatts, an efficiency of 35%, and a conversion factor of 3,413 Btus per kilowatt-hour were used to calculate the maximum designed operating rate based on heat input of the engine in million Btus (MMBtus) per hour.

### Equation 4-1 – Heat Input Calculation

$$HeatInput \left[ \frac{MMBtus}{hr} \right] = \left( \frac{OperatingRate [kW] \times 3,413 \left[ \frac{Btu}{hr \times kW} \right]}{10^6 \left[ \frac{Btu}{MMBtu} \right] \times 35\%} \right)$$

The maximum designed heat input for the engine is 26.8 MMBtus per hour. The potential emissions for the engine were calculated using Equation 4-2, the heat input and an annual operation of 8,760 hours per calendar year.

**Equation 4-2 – Potential Emission Calculations for Distillate Oil**

$$Potential\ Emissions\ \left[ \frac{tons}{year} \right] = \left( \frac{Emission\ Factor\ \left[ \frac{pounds}{MMBTU} \right] \times Annual\ Operations\ \left[ \frac{hr}{year} \right] \times HeatInput\ \left[ \frac{MMBtu}{hr} \right]}{2000\ \left[ \frac{pounds}{tons} \right]} \right)$$

Table 4-2 displays the potential emissions from the engine and the tank.

**Table 4-2 - Potential Emissions (tons per year)**

Description	TSP	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	HAPs	CO
<b>Generator #1</b>	8.2	6.8	6.8	33.1	378.4	9.7	0.2	99.7
<b>Tank #1</b>	-	-	-	-	-	0	-	-
<b>Total Emissions</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>33</b>	<b>378</b>	<b>10</b>	<b>0</b>	<b>100</b>

NorthWestern Energy is not one of the 28 named PSD source categories but does have potential nitrogen oxide emissions greater than 250 tons per year threshold. Therefore, NorthWestern Energy is considered a major source under the PSD program. Since NorthWestern Energy was constructed in 1969, which is prior to August 7, 1977, NorthWestern Energy has not been required to obtain a PSD permit. However, any modification that occurs at this facility must be reviewed to determine if it is considered a major modification under the PSD program.

**4.5 Potential Greenhouse Gas Emissions**

The next step is to determine if NorthWestern Energy – Clark has the potential to emit 100,000 tons per year of carbon dioxide equivalent emissions or more. The six regulated greenhouse gases are the following:

1. Carbon dioxide;
2. Nitrous oxide;
3. Methane;
4. Hydrofluorocarbons;
5. Perfluorocarbons; and
6. Sulfur hexafluoride.

In the case of the greenhouse gases, there is a discrepancy in the amount of heat each constituent can trap in the atmosphere. This needs to be normalized so that emissions can be effectively quantified. This is done by calculating Carbon Dioxide Equivalent (CO<sub>2e</sub>) emissions. In order to get these numbers the emission values are multiplied by a factor. Table 4-3 contains the factors for the greenhouse gas constituents resulting from combustion.

**Table 4-3 – CO<sub>2e</sub> Factors**

Gas	CO <sub>2e</sub> Factors
Carbon Dioxide	1
Nitrous Oxide	310
Methane	21

#### 4.5.1 Stationary Internal Combustion Sources – Greenhouse Gases

The greenhouse gas emission factor for firing Unit #1 with distillate oil is from AP-42, Table 3.4-1, October 1996 and are listed below:

1. Carbon dioxide = 165 lbs/MMBtus

There were no emission factors for nitrous oxide and methane; therefore, they are considered negligible.

Equation 4-2 will also be used to calculate greenhouse gas emissions. In the case of greenhouse gases, the result of Equation 4-2 needs to be multiplied by 1 for carbon dioxide to convert the results to carbon dioxide equivalent. The potential emissions for the greenhouse gases are summarized in Table 4-4.

*Table 4-4 – Greenhouse Gas Potential Emissions (tons per year)*

Unit	Carbon Dioxide	Carbon Dioxide Equivalent
#1	19,368	19,368

NorthWestern Energy’s greenhouse gas emissions are less than the major source threshold for an existing PSD source. Therefore, NorthWestern Energy is not a major source for greenhouse gases and not subject to a PSD review.

## 5.0 National Emissions Standards for Hazardous Air Pollutants

The department reviewed the national emission standards for hazardous standards and determined NorthWestern is not applicable to any standards under 40 CFR Part 61.

## 6.0 Maximum Achievable Control Technology Standards

The federal Maximum Achievable Control Technology Standards are applicable to both major and area sources of hazardous air pollutants. A major source of hazardous air pollutants is defined as having the potential to emit 10 tons or more per year of a single hazardous air pollutant or 25 tons per year or more of a combination of hazardous air pollutants. An area source is a source that is not a major source of hazardous air pollutants.

### 6.1 Potential HAP Emissions

The department uses stack test results to determine air emissions whenever stack test data is available from the source or a similar source. When stack test results are not available, the department relies on manufacturing data, material balance, EPA’s Compilation of Air Pollutant Emission Factors (AP-42, Fifth Edition, Volume 1) document, the applicant’s application, or other methods to determine potential air emissions.

### **6.1.1 Potential HAP Emissions – Stationary Internal Combustion Sources**

AP-42, Table 3.3-2, October 1996 lists the hazardous air pollutants emission factors for a large engine at 0.00156 pounds per million Btus.

Using Equation 4-2, the hazardous air pollutant emission factors, the heat input, and assuming 8,760 hours of operation per year per engine, the potential hazardous air pollutant emissions for the diesel engine generator is included in Table 6-1.

**Table 6-1 – Potential HAP Emissions**

<b>Unit</b>	<b>Total HAPs</b>
<b>#1</b>	0.18 tons per year

The potential hazardous air pollutant emissions are less than the major source threshold under the Title V air quality operating permit program. Therefore, NorthWestern Energy – Clark is considered an area source.

The department reviewed the Maximum Achievable Control Technology (MACT) standards under 40 CFR Part 63 and determined the following need to be reviewed further to determine if they are applicable.

### **6.2 Standards Applicable to Engines**

Subpart ZZZZ is applicable to any existing, new, or reconstructed stationary reciprocating internal combustion engines located at a major or area source of hazardous air pollutant emissions, excluding stationary reciprocating internal combustion engines being tested at a stationary reciprocating internal combustion engines test cell/stand.

Engines constructed prior to June 12, 2006 are considered existing engines. Unit #1 was constructed prior to 2006 and is located at an area source. Therefore Unit #1 is applicable to Subpart ZZZZ and has the following applicability:

1. Existing area source;
2. Non-emergency, non-black start, compression ignition engine;
3. Not related to oil and gas production;
4. Less than 500 horsepower;
5. Displacement of less than 30 liters per cylinder.

### **6.3 Other MACT Standards**

The department reviewed the other Maximum Achievable Control Technology Standards and determined there are no other standards applicable to NorthWestern Energy - Clark.

## 7.0 State Requirements

Any source operating in South Dakota that meets the requirements of the Administrative Rules of South Dakota (ARSD) 74:36:05:03 is required to obtain a Title V air quality operating permit. NorthWestern Energy – Clark’s nitrogen oxides (NO<sub>x</sub>) and carbon monoxide (CO) emissions are equal to or greater than 100 tons per year, carbon dioxide equivalent (CO<sub>2</sub>) emissions are less than 100,000 tons per year and hazardous air pollutant emissions are less than 10 tons per year for a single hazardous air pollutant and 25 tons per year of a combination of hazardous air pollutant. Based on the emission estimates, NorthWestern Energy - Clark is considered a major source under the Title V air quality operating permit program.

Even a minor source may require a Title V permit if it is applicable to a New Source Performance Standard or a National Emission Standard for Hazardous Air Pollutants (MACT). NorthWestern Energy - Clark is applicable to the MACT standard Subpart ZZZZ.

NorthWestern Energy - Clark is required to obtain a Title V air quality operating permit.

### 7.1 State Particulate Emission Limits

Total suspended particulate and sulfur dioxide emission limits are applicable to fuel burning units. NorthWestern Energy’s operations involve fuel burning units. The total suspended particulate and sulfur dioxide emission limits for fuel burning units are derived from ARSD 74:36:06:02.

In accordance with ARSD 74:36:06:01, a unit that must comply with a sulfur dioxide emission limit under the New Source Performance Standards, Maximum Achievable Control Technology Standards, the Acid Rain Program, or the Prevention of Significant Deterioration Program is exempt from having to meet the state’s sulfur dioxide emission limits.

Unit #1 must comply with the sulfur dioxide emission limit under Maximum Achievable Control Technology Standard Subpart ZZZZ. Therefore, Unit #1 is exempt from having to meet the state’s sulfur dioxide emission limit.

The particulate limit in Table 7-1 is found using Equation 7-1 from ASRD 74:36:60:02 (b).

#### *Equation 7-1 – Particulate Limit*

$$E = 0.811H^{-0.131}$$

Where:

- E = emission rate, in pounds per million Btu heat input, and
- H = heat input, in million Btus per hour.

Tables 7-1 compares the potential emission rates to the allowable emission limits for particulate.

**Table 7-1 – Particulate (TSP) Comparison**

<b>Unit</b>	<b>Distillate Oil Potential Rate</b>	<b>Particulate Limit</b>
<b>Diesel engine Generator</b>	0.0697 lbs/MMBtus	0.53 lbs/MMBtus

## **7.2 State Restrictions on Visible Emissions**

Visible emissions are applicable to any unit that discharges to the ambient air. In accordance with ARSD 74:36:12, a facility may not discharge into the ambient air more than 20 percent opacity for all units. NorthWestern Energy must control the opacity at less than 20 percent for the diesel engine generator.

## **7.3 Air Fees**

Title V sources are subject to an annual air quality fee. The fee consists of an administrative fee and a per ton fee based on the actual tons per year of pollutant emitted. The pollutants that are charged are particulate matter, sulfur dioxides, nitrogen oxides, volatile organic compounds and hazardous air pollutants. Presently, the air emission fee is \$7.50 per ton of pollutant actually emitted. The actual emissions are calculated by the department and are based on information provided by the source.

## **7.4 Compliance Assurance Monitoring (CAM)**

Compliance assurance monitoring is applicable to permit applications received on or after April 20, 1998, from major sources applying for a Title V permit. NorthWestern Energy’s renewal application was received on March 1, 2001. Therefore, compliance assurance monitoring is applicable to any unit that meets the following criteria:

1. The unit is subject to an emission limit or standard for the applicable regulated air pollutant;
2. The unit uses a control device to achieve compliance with any such emission limit or standard; and
3. The unit has potential uncontrolled emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source.

NorthWestern Energy does not use a control device to achieve compliance with applicable requirements. Therefore, compliance assurance monitoring is not applicable to NorthWestern Energy.

## **7.5 Periodic Monitoring**

Periodic monitoring is required for each emission unit that is subject to an applicable requirement at a source subject to Title V of the federal Clean Air Act. NorthWestern Energy is required to meet opacity, particulate and sulfur dioxide emission limits.

Periodic monitoring for the opacity and particulate emission limits may consist of visible emission readings, stack tests, etc. NorthWestern Energy typically operates the diesel engine – generator less than 100 hours in a calendar year. NorthWestern Energy will be required to perform periodic visible emission readings when the unit is in operation to ensure the unit can meet its opacity and particulate emission limits. The permit contains sufficient language which allows the department to require NorthWestern Energy to conduct a stack test if visible emission readings or hours of operation warrant a stack test during the term of the permit.

NorthWestern Energy’s diesel engine generator is not operated on a regularly scheduled basis. The diesel engine generator is located at a remote, unmanned facility and operates less than 100 hours in a calendar year. General permit conditions require facilities subject to Title V to perform visible emissions testing on a quarterly or annual basis dependent upon occurrence of operation. NorthWestern Energy expressed concern about performing visible emissions testing on a quarterly basis at an unmanned facility. After reviewing the circumstances, the department has determined NorthWestern Energy will only be required to perform a visible emissions reading once per calendar year.

Periodic monitoring for sulfur dioxide shall be based on the sulfur content of the distillate oil fired in the engine – generator.

## **8.0 Recommendation**

Based on the information submitted in the air quality permit application, the department recommends approval of a Title V air quality operating permit for NorthWestern Energy’s facility in Clark, South Dakota. NorthWestern Energy – Clark is required to operate within the requirements stipulated in the following regulations:

1. ARSD 74:36:05 – Operating Permits for Part 70 Sources;
2. ARSD 74:36:06 – Regulated Air Pollutant Emissions;
3. ARSD 74:36:08 – National Emission standards for hazardous air pollutants;
4. ARSD 74:36:09 – Prevention of Significant Deterioration;
5. ARSD 74:36:11 – Performance Testing;
6. ARSD 74:36:12 – Control of Visible Emissions; and
7. ARSD 74:37:01 – Air Pollution Control Program Fees.

Questions regarding this permit review should be directed to April Soukup, Engineer I, Air Quality Program.