AIR POLLUTION CONTROL PERMIT TO CONSTRUCT

Permittee: **Name**: Argent Midstream Solutions, LLC **Address**: 2850 N Harwood Street, Suite 1600 Dallas, TX 75201	**Permit Number**: ACP-18278 v1.0 **Permit Description**: Synthetic Minor PTC Future Synthetic Minor PTO
Source Name & Location: County Line Gas Plant 10261 - 74th Street Northwest Tioga, ND 58852 Williams County	**Source Type**: Natural Gas Processing
Date of Application: December 3, 2024	

Pursuant to Chapter 23.1-06 of the North Dakota Century Code (NDCC), and the Air Pollution Control Rules of the State of North Dakota (Article 33.1-15 of the North Dakota Administrative Code or NDAC), and in reliance on statements and representations heretofore made by the permittee (i.e., owner) designated above, a Permit to Construct is hereby issued authorizing such permittee to construct and initially operate the source unit(s) at the location designated above. This Permit to Construct is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Environmental Quality (Department) and to any conditions specified below:

Date: _____

James L. Semerad
Director
Division of Air Quality

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1. Project and Facility Emissions Units:

This Permit to Construct allows the construction and initial operation of the herein-mentioned new or modified equipment at the source. The source may be operated under this Permit to Construct until a Permit to Operate is issued unless this permit is suspended or revoked. The source is subject to all applicable rules, regulations, and orders now or hereafter in effect of the North Dakota Department of Environmental Quality and to the conditions specified herein.

Table 1-1 lists the new emissions units associated with the Project.

Table 1-2 lists all emissions units associated with the facility upon Project completion.

Table 1-1: Project Emissions Units (new to facility)

Emission Unit Description [A]	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Two Caterpillar G3606 ADEM4 (4SLB) natural gas-fired compressor engine rated at 2,065 bhp (2024) (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOb) [B]	ENG-1 & ENG-2	ENG-1 & ENG-2	Oxidation Catalyst
Waukesha L7044GSI gas-fired engines (4SRB) rated at 1,681 bhp (2008) (NSPS JJJJ & MACT ZZZZ)	ENG-3	ENG-3	Non-selective catalytic reduction (NSCR)
EG dehydration unit rated at 30 MMscfd, still vent (MACT HH)	EG-2still	FL-1 [C]	Flare (EU FL-1)
EG dehydration unit, flash tank	EG-2flash		
Gas fired hot oil heater rated at approximately 5 x 10^6 Btu/hr	HTR-2	HTR-2	None
Fugitive emissions (NSPS OOOOb)	FUG [B]	FUG	Leak Detection and Repair (LDAR) Program
MSS activities and pigging	MISC	MISC	None

[A] All emission unit ratings are considered nominal ratings.

[B] The compressor driven by the natural gas-fired engine is subject to NSPS OOOOb.

[C] Existing onsite Zeeco flare will be used to control vapors from EG-2.

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Table 1-2: Facility Emissions Units upon Project Completion

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Ethylene glycol (EG) dehydration unit rated at approximately 20 x 10^6 scfd, still vent [A]	EG-1still	EG-1still	None
DEVCO gas fired hot oil heater rated at approximately 7 x 10^6 Btu/hr	HTR-1	HTR-1	None
Three 400 bbl condensate tanks (NSPS OOOOb)	TK-1, TK-2, & TK-3 [B]	COMB	Combustor (COMB)
400 bbl produced water tank (NSPS OOOOb)	TK-7		
Condensate truck loadout	LOAD-1 [C]		
Pressurized loadout of NGLs	LOAD-2 [C, D]		
Produced water loadout	LOAD-3 [C, D]		
Zeeco combustor	COMB		N/A
EG dehydration unit rated at 30 MMscfd, still vent (MACT HH)	EG-2still [E]	FL-1	Flare
EG dehydration unit, flash tank (MACT HH)	EG-2flash [E]		
Zeeco flare [G]	FL-1		N/A
Gas fired hot oil heater rated at approximately 5 x 10^6 Btu/hr	HTR-2 [D]	HTR-2	None
Two electric-driven compressors (NSPS OOOOa)	EC-1 & EC-2 [B, D]	EC-1 & EC-2	NSPS OOOOa
Two Caterpillar G3606 ADEM4 (4SLB) natural gas-fired compressor engine rated at 2,065 bhp (2024) (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOb)[F]	ENG-1 & ENG-2 [E]	ENG-1 & ENG-2	Oxidation Catalyst
Waukesha L7044GSI gas-fired engines (4SRB) rated at 1,681 bhp (2008) (NSPS JJJJ & MACT ZZZZ)	ENG-3 [E]	ENG-3	Non-selective catalytic reduction (NSCR)
Fugitive emissions (NSPS OOOOb)	FUG [D]	FUG	Leak Detection and Repair (LDAR) Program
1,000 gallon ethylene glycol tank	TK-4 [B, D]	TK-4	None

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Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
1,000 gallon methanol tank	TK-5 [B, D]	TK-5	None
1,000 gallon lube oil tank	TK-6 [B, D]	TK-6	None
MSS and pigging activities	MISC	MISC	None

[A] Flash tank gas from EG-1 is routed to the compressors.
[B] Existing unit not previously included in permit.
[C] Vapors from truck loading are sent back to the tanks and are controlled by the combustor.
[D] Insignificant or fugitive emission source (no specific emission limits).
[E] New unit associated with this permit action.
[F] The compressor driven by the natural gas-fired engine is subject to NSPS OOOOb.
[G] Process and emergency flare.

2. Applicable Standards, Restrictions and Miscellaneous Conditions:

A. New Source Performance Standards (NSPS):

The permittee shall comply with all applicable requirements of the following NSPS subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-12 of the North Dakota Air Pollution Control Rules and 40 CFR 60.

1) Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (EU ENG-1 through ENG-3).

2) Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 and on or Before December 6, 2022 (EU EC-1 & 2). Applicability to this subpart is not affected with this permit action.

3) Subpart OOOOb - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced after December 6, 2022 (EU FUG, EU TK-1 through 3, EU TK-7, and compressors driven by ENG-1 & 2).

B. National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Source Categories/Maximum Achievable Control Technology (MACT):

The permittee shall comply with all applicable requirements of the following MACT subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-22 of the North Dakota Air Pollution Control Rules and 40 CFR 63.

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1) Subpart HH - National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (EU EG-1still, EU EG-2still & EU EG-2flash) The North Dakota Department of Environmental Quality has not adopted the area source provisions of this subpart. Please send all documentation to EPA at the following address:

U.S. EPA Region 8
1595 Wynkoop Street
Mail Code 8ENF-AT
Denver, CO 80202-1129

2) Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (EU ENG-1 through ENG-3). Please send all documentation to EPA at the above address.

C. Fuel Restrictions:

Natural gas-fired engines (EU ENG-1 through ENG-3) and the TEG heater (EU HTR-2) are restricted to combusting only natural gas containing no more than 2 grains of sulfur per 100 standard cubic feet.

D. Combustor Restrictions (EU COMB):

1) The permittee must ensure the closed vent system and enclosed combustion devices are maintained in a leak-free condition.

2) The combustor shall be designed and operated with no visible emissions except for periods not to exceed a total of 1 minute during any 15-minute period. A visible emissions test using section 11 of EPA Method 22 of appendix A-7 of this part must be performed at least once every calendar month, separated by at least 15-days between each test. The observation period shall be 15-minutes, or once the amount of time visible emissions is present has exceeded 1-minute, whichever time period is less. Devices failing the visible emissions test must follow manufacturer's repair instructions, if available, or best combustion engineering practice as outlined in the unit inspection and maintenance plan, to return the unit to compliant operation. All inspection, repair and maintenance activities for each unit must be recorded in a maintenance and repair log and must be available for inspection. Following return to operation from maintenance or repair activity, each device must pass a Method 22 of appendix A-7 of this part visual observation as described in this paragraph.

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3) The combustor shall be operated with a flame present at all times when gas may be directed to the combustor. The presence of a pilot flame shall be monitored using a thermocouple or any other equivalent device to detect the presence of a flame. If a continuous burning pilot is not installed, the combustor must be equipped and operated with an automatic ignitor as outlined in NDAC 33.1-15-07-02.

4) The permittee shall monitor the combustor to ensure that it is operated and maintained in conformance with the manufacturer designs and specifications.

E. Flare Restrictions (EU FL-1):

1) During times that EU EG-2still and EU EG-2flash vapors are routed to EU FL-1 for control, the permittee shall comply with the control device and work practice requirements as indicated in 40 CFR 63.11(b) for emissions controlled by EU FL-1. EU FL-1 shall be designed for and operated with no visible emissions, except for periods not to exceed a total of five minutes during any two consecutive hours. All other times, the opacity emission limit is 20% (60% opacity is permissible for not more than one six-minute period per hour).

2) When it is necessary to operate the flare during emergency, malfunction or maintenance, all precautions shall be taken to minimize emissions and maintain compliance with the applicable ambient air quality standards as outlined in NDAC 33.1-15-02 and the opacity standards.

3) The flare must be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order as outlined in NDAC 33.1-15-07-02.

4) The presence of a flame shall be monitored using a thermocouple or any other equivalent device approved by the Department.

3. Emission Unit Limits:

Emission limits from the operation of the source unit(s) identified in Table 1-1 and Table 1-2 of this Permit to Construct (hereafter referred to as "permit") are as follows. Source units not listed are subject to the applicable emission limits specified in the North Dakota Air Pollution Control Rules.

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Table 3-1: Permit Emissions Limits

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Pollutant / Parameter	Emission Limit
Compressor Engines	ENG-1 through ENG-3	ENG-1 through ENG-3	NOx	0.5 g/hp-hr [A, B]
			CO	0.5 g/hp-hr [A, B]
			VOC	0.7 g/hp-hr or 60 ppmvd @ 15% O_2 [A, B]
			Opacity	20% [C]
Hot oil heater	HTR-1	HTR-1	Opacity	20% [C]
Heater treater	HTR-2	HTR-2	Opacity	20% [C]
Zeeco combustor	COMB	COMB	Opacity	0%/Condition 2.D
Zeeco flare	FL-1	FL-1	Opacity	0%/Condition 2.E

[A] Compliance determined via emissions testing.
[B] Less restrictive 40 CFR 60 Subpart JJJJ limits also apply as follows: NOx of 1.0 g/hp-hr or 82 ppmvd @ 15% O_2; CO of 2.0 g/hp-hr or 270 ppmvd @ 15% O_2
[C] 40% opacity is permissible for not more than one six-minute period per hour.

4. Emission Testing Requirements:

A. Initial testing:

All initial testing will require a minimum of three runs, one hour each, unless otherwise specified in a federal subpart.

Table 4-1: Initial Emissions Testing for Project

Description (EU)	EP	Contaminant	Method
ENG-1 through ENG-3	ENG-1 through ENG-3	NO_X	Per NSPS, Subpart JJJJ
		CO	
		VOC	

A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate

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reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline.[1]

1) Test:

Within 180 days after initial startup, the permittee shall conduct emissions tests at the emission units listed in Table 4-1 using an independent testing firm, to determine the compliance status of the facility with respect to the emission limits specified in Table 3-1. Emissions testing shall be conducted for the pollutant(s) listed above in accordance with EPA Reference Methods listed in 40 CFR 60, Appendix A. Test methods other than those listed above may be used upon approval by the Department.

2) Notification:

The permittee shall notify the Department using the form in the Emission Testing Guideline, or its equivalent, at least 30 calendar days in advance of any tests of emissions of air contaminants required by the Department. If the permittee is unable to conduct the performance test on the scheduled date, the permittee shall notify the Department at least five days prior to the scheduled test date and coordinate a new test date with the Department.

3) Sampling Ports/Access:

Sampling ports shall be provided downstream of all emission control devices and in a flue, conduit, duct, stack or chimney arranged to conduct emissions to the ambient air. The ports shall be located to allow for reliable sampling and shall be adequate for test methods applicable to the facility. Safe sampling platforms and safe access to the platforms shall be provided. Plans and specifications showing the size and location of the ports, platform and utilities shall be submitted to the Department for review and approval.

4) Other:

a) The Department may require the permittee to have tests conducted to determine the emission of air contaminants from any source, whenever the Department has reason to believe that an emission of a contaminant not addressed by the permit applicant is occurring, or the emission of a contaminant in excess of that allowed by this permit is occurring. The Department may specify testing methods to be used in accordance with good professional practice. The Department may observe the testing. All tests shall be conducted by reputable, qualified personnel. A signed copy of the test results shall be furnished to the Department within 60 days of the test date.

All tests shall be made available, and the results calculated in

[1] See February 7, 2020, North Dakota Department of Environmental Quality Division of Air Quality Emissions Testing Guidelines. Available at: https://www.deq.nd.gov/publications/AQ/policy/PC/Emission_Testing_Guide.pdf

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accordance with test procedures approved by the Department. All tests shall be made under the direction of persons qualified by training or experience in the field of air pollution control as approved by the Department.

b) The Department may conduct tests of emissions of air contaminants from any source. Upon request of the Department, the permittee shall provide necessary holes in stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants.

B. Sampling and Testing:

The Department may require the permittee to conduct tests to determine the emission rate of air contaminants from the source. The Department may observe the testing and may specify testing methods to be used. A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline.

5. General Conditions (Equipment):

A. Best Management Practices:

At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

B. Operation of Air Pollution Control Equipment:

The permittee shall maintain and operate all air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.

C. Like-Kind Engine Replacement:

This permit allows the permittee to replace an existing engine with a like-kind unit. Replacement is subject to the following conditions:

1) The Department must be notified within 10 days after change-out of the unit.

2) The replacement unit shall operate in the same manner, provide no increase in throughput and have equal or less emissions than the unit it is replacing.

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3) The date of manufacture of the replacement unit must be included in the notification. The facility must comply with any applicable federal standards (e.g. NSPS, MACT) triggered by the replacement.

4) The replacement unit is subject to the same state emission limits as the existing unit in addition to any NSPS or MACT emission limit that is applicable. Testing shall be conducted to confirm compliance with the emission limits within 180 days after start-up of the unit.

D. Organic Compound Emissions:

The permittee shall comply with all applicable requirements of NDAC 33.1-15-07 – Control of Organic Compounds Emissions.

E. Air Pollution from Internal Combustion Engines:

The permittee shall comply with all applicable requirements of NDAC 33.1-15-08-01 – Internal Combustion Engine Emissions Restricted.

F. Fugitive Emissions:

The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.

6. General Conditions (Procedural):

A. Construction:

Construction of the above-described facility shall be in accordance with information provided in the permit application as well as any plans, specifications and supporting data submitted to the Department. The Department shall be notified 10 days in advance of any significant deviations from the specifications furnished. The issuance of this Permit to Construct may be suspended or revoked if the Department determines that a significant deviation from the plans and specifications furnished has been or is to be made.

Any violation of a condition issued as part of this permit to construct as well as any construction which proceeds in variance with any information submitted in the application, is regarded as a violation of construction authority and is subject to enforcement action.

B. Startup Notice:

A notification of the actual date of initial startup shall be submitted to the Department within 15 days after the date of initial startup.

C. Permit Invalidation:

This permit shall become invalid if construction is not commenced within 18 months after issuance of such permit, if construction is discontinued for a period of 18 months or more; or if construction is not completed within a reasonable time.

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D. Source Operations:

Operations at the installation shall be in accordance with statements, representations, procedures and supporting data contained in the initial application, and any supplemental information or application(s) submitted thereafter. Any operations not listed in this permit are subject to all applicable North Dakota Air Pollution Control Rules.

E. Alterations, Modifications, or Changes:

Any alteration, repairing, expansion, or change in the method of operation of the source which results in the emission of an additional type or greater amount of air contaminants or which results in an increase in the ambient concentration of any air contaminant, must be reviewed and approved by the Department prior to the start of such alteration, repairing, expansion or change in the method of operation.

F. Recordkeeping:

The permittee shall maintain any compliance monitoring records required by this permit or applicable requirements. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report or application. Support information may include all calibration and maintenance records and all original strip-chart recordings/computer printouts for continuous monitoring instrumentation, and copies of all reports required by the permit.

G. Annual Emission Inventory/Annual Production Reports:

The permittee shall submit an annual emission inventory report and/or an annual production report upon Department request, on forms supplied or approved by the Department.

H. Malfunction Notification:

The permittee shall notify the Department of any malfunction which can be expected to last longer than twenty-four hours and can cause the emission of air contaminants in violation of applicable rules and regulations.

I. Nuisance or Danger:

This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.

J. Transfer of Permit to Construct:

The holder of a permit to construct may not transfer such permit without prior approval from the Department.

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K. Right of Entry:

Any duly authorized officer, employee or agent of the North Dakota Department of Environmental Quality may enter and inspect any property, premise or place at which the source listed in Condition 1 of this permit is located at any time for the purpose of ascertaining the state of compliance with the North Dakota Air Pollution Control Rules. The Department may conduct tests and take samples of air contaminants, fuel, processing material, and other materials which affect or may affect emissions of air contaminants from any source. The Department shall have the right to access and copy any records required by the Department's rules and to inspect monitoring equipment located on the premises.

L. Other Regulations:

The permittee of the source unit(s) described in Condition 1 of this permit shall comply with all State and Federal environmental laws and rules. In addition, the permittee shall comply with all local burning, fire, zoning, and other applicable ordinances, codes, rules and regulations.

M. Permit Issuance:

This permit is issued in reliance upon the accuracy and completeness of the information set forth in the application. Notwithstanding the tentative nature of this information, the conditions of this permit herein become, upon the effective date of this permit, enforceable by the Department pursuant to any remedies it now has, or may in the future have, under the North Dakota Air Pollution Control Law, NDCC Chapter 23.1-06.

7. State Enforceable Only Conditions (not Federally enforceable)

A. Odor Restrictions:

The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which is in excess of the limits established in NDAC 33.1-15-16.

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