AIR QUALITY EFFECTS ANALYSIS
FOR
PERMIT TO CONSTRUCT
ACP-18278 v1.0

Applicant:

Argent Midstream Solutions, LLC *(previously "Silver Hill Energy Partners")*
2850 N Harwood Street, Suite 1600
Dallas, TX 75201

Facility Location:

County Line Gas Plant
10261 - 74th Street Northwest
Tioga, ND 58852
Williams County

Introduction and Background:

Argent Midstream Solutions, LLC (Argent) submitted a permit to construct application to the North Dakota Department of Environmental Quality – Division of Air Quality (Department) on December 3, 2024. Argent submitted a revised application on June 27, 2025, which contained updated equipment information and emissions calculations. The application was for the construction of additional units and modifications to current units at the existing County Line Gas Plant (or facility) located in Williams County, North Dakota.

County Line Gas Plant currently operates under Air Permit to Operate No. AOP-28026 v2.0, which expires on October 15, 2027.

Argent requested the addition of three gas fired compressor engines, a 30 million cubic feet per day (MMcfd) ethylene glycol (EG) dehydration unit, a heater treater, and included updated emissions from existing units resulting from increased throughout (referred to as "Project"). The application also contained information on existing units that were previously unaccounted for in the permit.

Upon Project completion, the emissions from the facility will be limited to below Title V thresholds and new source performance standard (NSPS) limits. Therefore, the facility will be classified as a synthetic minor source upon Project completion.

ACP-18278 v1.0 Table 1-1 lists the emissions units added with the Project.

ACP-18278 v1.0 Table 1-2 lists all the emissions units at County Line Gas Plant upon Project completion.

Facility Wide Emissions Profile
Potential to Emit (PTE)

Table 1 - PTE (tons per year) [A]

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs	Formaldehyde (Largest HAP)
EG1, still vent	EG-1still	EG-1still	--	--	--	2.72	--	--	--	1.40	--
DEVCO gas fired hot oil heater	HTR-1	HTR-1	2.52	3.01	0.02	0.17	0.23	0.23	0.23	0.06	0.00
Condensate tanks	TK-1, TK-2, & TK-3	COMB	3.42	0.40	0.00	3.85	--	--	--	0.07	--
Produced water tank	TK-7		0.00	0.00	0.00	0.28				0.00	
Condensate truck loadout	LOAD-1		0.03	0.01	0.00	1.92	--	--	--	0.00	--
Pressurized loadout of NGLs	LOAD-2		0.23	0.11	0.00	1.52	--	--	--	0.03	--
Produced water loadout	LOAD-3		0.00	0.00	0.00	0.00	--	--	--	0.00	--
Combustor - pilot	COMB		0.25	0.13	0.00	0.23	--	--	--	0.01	--
Engine 1 - 2,065 hp	ENG-1	ENG-1	9.97	9.97	0.04	13.96	0.68	0.68	0.68	4.89	3.59
Engine 2 - 2,065 hp	ENG-2	ENG-2	9.97	9.97	0.04	13.96	0.68	0.68	0.68	4.89	3.59
Engine 3 - 1,681 hp	ENG-3	ENG-3	8.12	8.12	0.04	11.36	1.32	1.32	1.32	2.20	1.39
Gas fired hot oil heater	HTR-2	HTR-2	1.80	2.15	0.01	0.12	0.16	0.16	0.16	0.04	0.00
EG2, still vent	EG-2still	FL-1	1.64	0.82	0.33	0.08	--	--	--	0.02	--
EG2, flash tank	EG-2flash		0.61	0.31	0.13	0.03	--	--	--	0.00	--
Flare - pilot	FL-1		0.25	0.13	0.00	0.23	--	--	--	0.01	--
Flare - upset/emergency	N/A [B]		44.66	22.37	0.00	8.26	--	--	--		--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs	Formaldehyde (Largest HAP)
Ethylene glycol tank	TK-4	TK-4	--	--	--	0.01	--	--	--	--	--
Methanol tank	TK-5	TK-5	--	--	--	0.01	--	--	--	0.00	--
Lube oil tank	TK-6	TK-6	--	--	--	--	--	--	--	--	--
MSS activities and pigging	MISC	MISC	--	--	--	8.26	--	--	--	0.13	--
Two electric-driven compressors	EC-1 & EC-2	EC-1 & EC-2	--	--	--	0.00	--	--	--	--	--
Process fugitive emissions	FUG	FUG	--	--	--	5.42	--	--	--	0.06	--
Total (without Fugitives and FL-1 upset/emergency):			**38.81**	**35.12**	**0.61**	**50.44**	**3.07**	**3.07**	**3.07**	**13.62**	**8.58**
Total (with Fugitives and FL-1 upset/emergency):			**83.47**	**57.49**	**0.61**	**72.38**	**3.07**	**3.07**	**3.07**	**13.81**	**8.58**

[A] Abbreviations:
PM: filterable and condensable particulate matter
$PM_{2.5}$: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (≤2.5 μm)
PM_{10}: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 10 microns (≤10 μm) including $PM_{2.5}$
SO_2: sulfur dioxide
NO_X: oxides of nitrogen
CO: carbon monoxide
VOCs: volatile organic compounds
HAPs: hazardous air pollutants as defined in Section 112(b) of the Clean Air Act

[B] Emissions estimated base on flaring 73.33 MMscf/yr of high pressure gas

As shown in Table 1, the facility wide PTE is below 100 tons per year (tpy) for all criteria air pollutants, below 10 tpy for any single hazardous air pollutant (HAP), and below 25 tpy for the combined HAP emissions. Detailed calculations have been provided in the permit application received on December 3, 2024, and revised on June 27, 2025[1]. The Department has reviewed these calculations and

[1] Minor revisions to the combustor and flare calculations were provided on July 3, 2025.

believes they accurately represent the proposed facility operations. Slight modifications, including the use of lean-burn HAP AP-42 emission factors for ENG-1/2, removal of ENG-1/2/3 HAPs from VOC totals, and lowering of fuel gas heating value to 1020 BTU/scf were incorporated by the Department.

The facility PTE is based on enforceable emissions restrictions put in place on the Project natural gas compressor engines, limiting the allowable amount of NO_X and CO. These restrictions mean the facility will be a synthetic minor source of air pollution, as the emissions are limited to below major source thresholds for the Title V program and NSPS limits.

Rules Analysis
Potentially Applicable Rules and Expected Compliance Status

A. NDAC 33.1-15-01 – General Provisions:

Multiple topics are included in the General Provisions chapter: entry onto premises - authority, variances, circumvention, severability, land use plans and zoning regulations (only to provide air quality information), measurement of air contaminants, shutdown and malfunction of an installation - requirements for notification, time schedule for compliance, prohibition of air pollution, confidentiality of records, enforcement, and compliance certifications.

Applicability and Expected Compliance

Based on the review of the information provided, the facility will comply with all applicable sections of this rule.

B. NDAC 33.1-15-02 – Ambient Air Quality Standards:

The facility must comply with the North Dakota and Federal Ambient Air Quality Standards (AAQS) and the "Criteria Pollutant Modeling Requirements for a Permit to Construct" guidelines[2].

Applicability and Expected Compliance

The facility is not subject to PSD, nor does the facility's PTE trigger the modeling thresholds listed in the "Criteria Pollutant Modeling Requirements for a Permit to Construct", therefore, preconstruction modeling for this Project was not required. Based on the facility PTE, compliance with the ambient air quality standards is expected to be maintained.

C. NDAC 33.1-15-03 – Restriction of Emission of Visible Air Contaminants:

This chapter requires all non-flare sources from new facilities to comply with an opacity limit of 20% except for one six-minute period per hour when 40% opacity is permissible. This chapter also requires facility flares to comply with an opacity limit of 20% except for one six-minute period per hour when 60% opacity is permissible. Lastly, this chapter restricts the opacity of fugitive emissions transported off property to 40% except for one six-minute period per hour when 60% opacity is permissible. This chapter also contains exceptions under certain circumstances and provides the method of measurement to determine compliance with the referenced limits.

[2] See October 6, 2014, Criteria Pollutant Modeling Requirements for a Permit to Construct. Available at: https://www.deq.nd.gov/publications/AQ/policy/Modeling/Criteria_Modeling_Memo.pdf

Applicability and Expected Compliance

The facility engines, heaters, flare (used for EG still vent and flash tank vapor control), and combustor are subject to this chapter's standards.

Based on the Department's experience with engines and heaters, the facility is expected to comply with the 20% opacity limit for these units.

The facility combustor (EU COMB) is currently used to control vapors from the storage tanks (EUs TK-1 through TK-3, & TK-7) and loadout stations (EUs LOAD-1, LOAD-2, & LOAD-3). EU COMB is currently subject to this chapter's opacity standard of 20% in AOP-28026 v2.0. Since this combustor is used as a control device under for NSPS OOOOb (for EUs TK-1 through TK-3, & TK-7), the Department is modifying the EU COMB opacity limit to comply with an opacity standard of no visible emissions, see Condition 2.D of ACP-18278 v1.0. Based on the Department's experience with combustors operated in similar fashions, the facility is expected to comply with the standard of no visible emissions during normal operations.

The flare (EU FL-1) is currently used to control vapors from facility maintenance, malfunction, and emergency events. With this Project, EU FL-1 will also be used to control process emissions from EU EG-2still and EU EG-2flash. EU FL-1 is currently subject to this chapter's opacity standard of 20% in AOP-28026 v2.0. Since EU FL-1 will also be used as a control device for EU EG-2still and EU EG-2flash, the Department is modifying the EU FL-1 opacity standard of no visible emissions during times EU EG-2still and EU EG-2flash emissions are sent to FL-1, see Condition 2.E of ACP-18278 v1.0. During times EU EG-2still and EU EG-2flash are not sent to FL-1, FL-1 shall be subject to this chapter's standards. Based on the Department's experience with flares operated in similar fashions, the facility is expected to comply with the standards.

D. NDAC 33.1-15-04 – Open Burning:

No person may dispose of refuse and other combustible material by open burning, or cause, allow, or permit open burning of refuse and other combustible material, except as provided for in Section 33.1-15-04-02 or 33.1-15-10-02, and no person may conduct, cause, or permit the conduct of a salvage operation by open burning.

Applicability and Expected Compliance

The facility is subject to this chapter and will comply with all open burning regulations.

E. NDAC 33.1-15-05 – Emissions of Particulates Matter Restricted:

This chapter establishes particulate matter emission limits and restrictions for industrial process equipment and fuel burning equipment used for indirect heating.

Applicability and Expected Compliance

Since the fuel burning equipment used for indirect heating is fired on gaseous fuels, the particulate matter limits in this chapter do not apply. It should be noted that combustion of gaseous fuels in the units is expected to result in extremely low particulate matter emissions that are well below the allowable levels established by this chapter.

F. NDAC 33.1-15-06 – Emissions of Sulfur Compounds Restricted:

This chapter applies to any installation in which fuel is burned and the SO_2 emissions are substantially due to the sulfur content of the fuel; and in which the fuel is burned primarily to produce heat. This chapter is not applicable to installations which are subject to an SO_2 emission limit under Chapter 33.1-15-12, Standards for Performance for New Stationary Sources, or installations which burn pipeline quality natural gas.

Applicability and Expected Compliance

All of the combustion equipment at the facility not subject to an NSPS will burn natural gas or inherently low sulfur gaseous fuels and thus are compliant with sulfur restrictions in this chapter as part of its physical and operational design.

G. NDAC 33.1-15-07 – Control of Organic Compounds Emissions:

This chapter establishes requirements for the construction of organic compound facilities and the disposal of organic compounds gas and vapor generated as waste resulting from storage, refining, or processing operations at the facility.

Applicability and Expected Compliance

The facility compressors, EG dehydration unit, loadout stations, and tanks are subject to this chapter's requirements.

The Project compressors will comply with the pumps and compressors provision by installing and maintaining appropriate seals for their service and operating conditions. The facility electric compressors comply with the provision through installation and maintenance on seals.

EG dehydration unit vapors from the still vent and flash tank (EU EG-2still & EG-2flash) will comply with provisions by routing the vapors to the existing flare (EU FL-1).

The Project increases facility throughput, triggering modification under NSPS OOOOb. Therefore, for leak detection and repair of equipment in VOC and greenhouse gas (GHG) service (EU FUG), the facility will comply with the applicable requirements under NSPS OOOOb.

The facility operates stationary storage tanks (EUs TK-1 through TK-3, & TK-7) and loadout stations (EUs LOAD-1, LOAD-2, & LOAD-3) which comply with this chapter by utilizing EU COMB to control vapors.

The facility flare and combustor comply with this chapter by operating an automatic igniter or a continuous burning pilot.

H. NDAC 33.1-15-08 – Control of Air Pollution from Vehicles and Other Internal Combustion Engines:

This chapter restricts the operation of internal combustion engines which emit from any source unreasonable and excessive smoke, obnoxious or noxious gas, fumes or vapor. This chapter also prohibits the removal or disabling of motor vehicle pollution control devices.

Applicability and Expected Compliance

The Project engines (EUs ENG-1 through ENG-3) are also subject to opacity requirements under NDAC 33.1-15-03-02 and subject to the requirements of NSPS Subpart JJJJ. As a result of expected compliance with these provisions, the engines are not expected to emit any unreasonable and excessive smoke, obnoxious or noxious gases, fumes, or vapor.

I. NDAC 33.1-15-09 – [repealed]

J. NDAC 33.1-15-10 – Control of Pesticides:

This chapter provides restrictions on pesticide use and restrictions on the disposal of surplus pesticides and empty pesticide containers.

Applicability and Expected Compliance

The facility is subject to this chapter and is expected to comply with all applicable requirements should pesticides be used.

K. NDAC 33.1-15-11 – Prevention of Air Pollution Emergency Episodes:

When an air pollution emergency episode is declared by the Department, the facility shall comply with the requirements in Chapter 33.1-15-11 of the North Dakota Air Pollution Control (NDAPC) rules.

L. NDAC 33.1-15-12 – Standards of Performance for New Stationary Sources [40 Code of Federal Regulations Part 60 (40 CFR Part 60)]:

This chapter adopts most of the Standards of Performance for New Stationary Sources (NSPS) under 40 CFR Part 60. The Project is subject to the following subparts under 40 CFR Part 60 which have been adopted by North Dakota as of July 1, 2019:

Subpart A – General Provisions

Subpart A contains general requirements for plan reviews, notification, recordkeeping, performance tests, reporting, monitoring and general control device requirements.

Applicability and Expected Compliance

The facility will comply with the general provisions of Subpart A through submission of timely notifications, performance testing, reporting, and following the general control device and work practice requirements under Subpart A. In addition, any changes to the facility after it is built will be evaluated with respect to this subpart as well as others.

Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

Subpart JJJJ establishes emissions standards (NO_X, CO, VOC) and compliance schedules for all new, modified and reconstructed stationary spark ignition (SI) internal combustion engines (ICE) and equipment manufactured on or after July 1, 2007, regardless of size. The subpart applies to manufactures, owners, and operators of such engines and equipment. SI ICE are categorized in this subpart by usage, size and fuel type.

Applicability and Expected Compliance

The natural gas compressor engines (EUs ENG-1 through ENG-3) are subject to the requirements of NSPS Subpart JJJJ. EU ENG-1 and ENG-2 are each rated at 2,065 brake horsepower (bhp), were constructed in 2024, and will be equipped with an oxidation catalyst. ENG-3 is rated at 1,685 bp, was constructed in 2008, and will be equipped with non-selective catalytic reduction (NSCR) control.

Subpart JJJJ requires each engine to comply with the following emissions standards:

- 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
- VOC of 0.7 g/hp-hr or 60 ppmvd @ 15% O_2

Beyond the Subpart JJJJ limits, the ENG-1 through ENG-3 are restricted to lower engine emissions limits to avoid major source thresholds under Title V. As a result, Condition 3 of ACP-182758 v1.0 established the following limits:

- NOx of 0.5 g/hp-hr
- CO of 0.5 g/hp-hr

To demonstrate compliance with the above limits, the facility must conduct emissions testing every 8,760 hours of operations or every three years, whichever comes first.

The facility is also expected to comply with Subpart JJJJ requirements by properly maintaining and operating an air-to-fuel ratio controller and keeping a maintenance plan and records of conducted maintenance and, to the extent practicable, will maintain and operate the engines in a manner consistent with good air pollution control for minimizing emissions.

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

Subpart OOOOa establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities in the crude oil and natural gas production source category that commence construction, modification, or reconstruction after September 18, 2015, and prior to December 6, 2022.

Applicability and Expected Compliance

The facility operates two electric driven compressors which are subject to the requirements of Subpart OOOOa. The compressors comply with the applicable standards for reciprocating compressors under Subpart OOOOa.

Subpart OOOOb – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After December 6, 2022

Subpart OOOOb establishes emission standards and compliance schedules for the control of the pollutant greenhouse gases (GHG). The greenhouse gas standard in this subpart is in the form of a limitation on emissions of methane from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after December 6, 2022. This subpart also establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO_2) emissions from affected facilities in the crude oil and natural gas source category that commence construction, modification, or reconstruction after December 6, 2022.

Applicability and Expected Compliance

The Project compressors driven by the natural gas compressor engines (EU ENG-1 & ENG-2 are considered affected facilities under Subpart OOOOb. The compressors are expected to comply with the applicable standards for reciprocating compressors under Subpart OOOOb. Note that EU ENG-3 manufacture date predates the subpart OOOO applicability date and is not subject to Subpart OOOO/OOOOa/OOOOb applicable standards.

The stationary storage tanks (EUs TK-1 through TK-3) have uncontrolled emissions greater than 6 tpy of VOC and are controlled below 6 tpy using a combustor (EU COMB). EU COMB is required to meet the no visible emissions standard in 40 CFR 60.5412b to demonstrate emissions are being maintained below NSPS OOOOb thresholds.

The fugitive emissions (EU FUG) components that have a potential to emit VOCs and GHGs are considered affected facilities under Subpart OOOOb. The facility is expected to comply with the applicable fugitive emissions standards through development and implementation of a leak detection and repair (LDAR) program in compliance with Subpart OOOOb requirements. The LDAR program, at a minimum, shall require monitoring, reporting, and recordkeeping.

M. NDAC 33.1-15-13 – Emission Standards for Hazardous Air Pollutants [40 Code of Federal Regulations Part 61 (40 CFR Part 61)]:

This chapter discusses emission standards for hazardous air pollutants. It specifically incorporates a majority of the subparts and appendices of the National Emission Standards for Hazardous Air Pollutants (NESHAP) under 40 CFR Part 61 as of July 2, 2010.

Applicability and Expected Compliance

The facility does not appear to have any applicable requirements under this chapter.

N. NDAC 33.1-15-14 – Designated Air Contaminant Sources, Permit to Construct, Minor Source Permit to Operate, Title V Permit to Operate:

This chapter designates that federally regulated sources are required to obtain a Permit to Construct and a Permit to Operate and comply with specific emission control and air quality standards.

Applicability and Expected Compliance

The facility has submitted an application for a permit to construct and has met all requirements necessary to obtain a permit to construct. The facility will be considered a synthetic minor source via federally enforceable restrictions limiting the criteria air pollutants PTE below 100 tons per year (NOx and CO).

The permit must undergo public comment per NDAC 33.1-15-14-06.5.a.

Once the Project completes construction and meets the permit to construct requirements, an inspection will be performed by the Department. Pending a satisfactory facility inspection, the Project will be incorporated into the permit to operate by the Department.

O. NDAC 33.1-15-15 – Prevention of Significant Deterioration of Air Quality [40 CFR 52.21]:

This chapter adopts the federal provisions of the Prevention of Significant Deterioration of air quality (PSD) program (40 CFR 52.21). A facility is subject to PSD review if it is classified as a "major stationary source" under Chapter 33.1-15-15.

Applicability and Expected Compliance

This facility is not classified as a "major stationary source" under 40 CFR 52.21(b)(1)(i)(a) and is therefore only subject to PSD review if emissions of a regulated new source review (NSR) pollutant[3] exceed 250 tpy (excluding fugitive emissions). The PTE for this facility, as shown in Table 1, is below the 250 tpy threshold and therefore not subject to PSD review.

[3] See 40 CFR 52.21(b)(50). Available at: https://www.ecfr.gov/current/title-40/chapter-I/subchapter-C/part-52/subpart-A/section-52.21#p-52.21(b)(50)

P. NDAC 33.1-15-16 – Restriction of Odorous Air Contaminants:

This chapter restricts the discharge of objectionable odorous air contaminants which measures seven odor concentration units or greater outside the property boundary. The emission of hydrogen sulfide is also addressed with strict concentration limitations. The chapter also establishes the method of measurement using certified inspectors, scentometers, and other approved instruments.

Applicability and Expected Compliance

Based on Department experience with sources having similar emission units, processes, and low hydrogen sulfide concentrations, the facility is expected to comply with this chapter.

Q. NDAC 33.1-15-17 – Restriction of Fugitive Emissions:

This Chapter restricts fugitive emissions from particulate matter or other visible air contaminates and gaseous emissions that would violate Chapter 2 (ambient air quality standards), Chapter 15 (PSD), Chapter 16 (odor), or Chapter 19 (visibility).

Applicability and Expected Compliance

The facility will be required to take reasonable precautions to prevent fugitive emissions in violation of the above referenced NDAC chapters.

R. NDAC 33.1-15-18 – Stack Heights:

This chapter restricts the use of stack heights above good engineering practices (GEP). The chapter primarily adopts federal regulations listed under 40 CFR 51.100(ii). This chapter also restricts the use of dispersion techniques to affect the concentration of a pollutant in the ambient air. Demonstrations of good engineering practice stack heights must be made available for review.

Applicability and Expected Compliance

The proposed stacks at the facility do not exceed GEP and will not use dispersion techniques to affect the pollutant concentration in the ambient air.

S. NDAC 33.1-15-19 – Visibility Protection:

This chapter outlines regulations regarding visibility protection and applies to new major stationary sources as defined in Section 33.1-15-15-01. It contains provisions regarding visibility impact analysis, visibility models, notification requirements for permit applications, review by federal land managers, permit issuance criteria, and visibility monitoring.

Applicability and Expected Compliance

The facility is not a new major stationary source and therefore is not subject to the requirements of this chapter. Given the minor source levels of the visibility impairing air pollutants, such as NO_X, SO_2, and $PM_{2.5}$, it is expected that the facility will not adversely contribute to visibility impairment within the three units of the Theodore Roosevelt National Park (nearest federal Class I areas) or at the Lostwood National Wildlife Refuge.

T. NDAC 33.1-15-20 – Control of Emissions from Oil and Gas Well Production Facilities:

The facility is not an oil or gas well facility and is therefore not subject to the requirements of this chapter.

U. NDAC 33.1-15-21 – Acid Rain Program:

This chapter adopts the acid rain provisions of the Clean Air Act specified under 40 CFR Parts 72-78. The facility is not subject to the acid rain provision as they are not an electric utility.

V. NDAC 33.1-15-22 – Emissions Standards for Hazardous Air Pollutants for Source Categories [40 Code of Federal Regulations Part 63 (40 CFR Part 63)]:

This chapter adopts most of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Source Categories under 40 CFR Part 63. These standards typically apply to major sources of air pollution that are in a regulated source category. In addition to the major source requirements, some of the regulations have "area source" standards (for non-major sources). Some of the area source standards have not been adopted by the Department and compliance will be determined by the United States Environmental Protection Agency (USEPA) (i.e. 40 CFR 63, Subpart ZZZZ area source provisions have not been adopted by the Department).

Applicability

The facility's potential HAP emissions are less than 10 tons/year of any single HAP and are less than 25 tons/year of any combination of HAPs, so the facility is an area (minor) source of HAPs. As shown in the Table 1, total potential HAPs from the facility are approximately 14 tons/year. The greatest single potential HAP is formaldehyde at approximately 9 tons/year.

Subpart A – General Provisions

Subpart A contains general requirements for prohibited activities and circumvention, preconstruction review and notification, standards and maintenance requirements, performance tests, monitoring, recordkeeping, reporting, and control device work practice requirements.

Applicability and Expected Compliance

The facility will comply with the general provisions of Subpart A through submission of timely notifications, performance testing, monitoring, recordkeeping, reporting, and following the control device work practice requirements under Subpart A.

Subpart HH – National Emission Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities

Subpart HH outlines regulations for emission control measures at oil and gas production sites, including requirements for equipment leaks, control devices, testing procedures, monitoring, and compliance demonstrations to limit the release of hazardous air pollutants from these facilities.

Applicability and Expected Compliance

The Project EG dehydration unit (EU EG-2still & EG-2flash) and existing EU EG1-still meet the Subpart HH exemption standard (40 CFR 63.764(e)(1)(ii)) and are required to keep records in accordance with 40 CFR 63.774(d). 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

Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emissions from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

Applicability and Expected Compliance

The facility has engines (EU ENG-1 through ENG-3) subject to the requirements under this subpart. The requirements of Subpart ZZZZ for the engines are met by complying with the requirements of NDAC 33.1-15-12 [40 CFR 60], Subpart JJJJ. Please send all documentation to EPA at the above address

W. NDAC 33.1-15-23 – Fees:

This chapter requires a filing fee of $325 for permit to construct applications, plus any additional fees based on actual processing costs. The additional fees based on processing

costs will be assessed upon issuance of the draft permit to construct. The annual operating permit fee is also applicable.

The applicant has paid the $325 filing fee and may be required to pay the additional fees associated with the permit processing.

X. NDAC 33.1-15-24 – Standards for Lead-Based Paint Activities:

The facility will not perform any lead-based painting and is therefore not subject to this chapter.

Y. NDAC 33.1-15-25 – Regional Haze Requirements:

This chapter is specific to existing stationary sources or groups of sources which have the potential to "contribute to visibility impairment" as defined in Section 33.1-15-25-01.2. Existing stationary sources or groups of sources determined to contribute to visibility impairment may be required to implement emissions reduction measures to help the Department make reasonable progress toward North Dakota's reasonable progress goals established in accordance with 40 CFR 51.308.

Applicability and Expected Compliance

The facility is not a new source and based on low PTE of visibility impairment pollutants is not expected to contribute to visibility impairment. Therefore, the facility is not subject to the requirements of this chapter.

Summary:

A complete review of the proposed project indicates that the facility is expected to comply with the applicable federal and state air pollution rules and regulations. The Department will make a final recommendation on the issuance of a Permit to Construct for the County Line Gas Plant following the completion of a 30-day public comment period. The public comment period will run from July 25, 2025, through August 24, 2025.

Update post comment period:
[Reserved]

Date of Draft Analysis: July 22, 2025
Date of Final Analysis: [Reserved]

Analysis By:

David Stroh
Permit Program Manager
Division of Air Quality

DES:er