
MEMO TO : File
Fargo Public Schools
Heating Plants
Cass County, North Dakota

FROM : Michaela Rose
Environmental Scientist II
Division of Air Quality

RE : March 6, 2025, Issuance of a Permit to Construct

DATE : Draft April 4, 2025

The Department of Environmental Quality – Air Quality (Department) received an application from Fargo Public Schools – Heating Plant (Fargo PS) on March 6, 2025, to renew their current operating permit for the existing facility located in Cass County, North Dakota. *Note: each heating plant facility is located at a separate individual school located in Fargo. All heating plant facility emission units have been consolidated in one permit for ease of permit management.* During the renewal process the Department determined that it would be appropriate to reevaluate the facility’s current permit classification as a true minor source. Upon reevaluation, the Department realized that Fargo PS should be permitted as a synthetic minor source due to operating hours restrictions on various generator engines.

The facility currently operates under Air Permit to Operate No. AOP-27220 v4.0, which expired on March 02, 2025. The Department anticipates issuing a renewal of the operating permit, as a synthetic minor source, post completion of this permit action.

Emission unit (EU) descriptions for the existing generator engines (EUs 5 through 7, 10, 13 through 22) have been updated to reflect how these units are contractually obligated to operate. No physical changes are proposed to these units with this permit action. Generator engines (EUs 5 through 7, 10, 13 through 15, 17 through 20) have had their EU description changed from cogeneration to curtailment response generator. Generator engines (EUs 16, 21, & 22) have had their EU description changed from cogeneration to emergency generator. Additionally, three facilities were not included in any permit application(s) for Fargo PS, and as a result, these facility emission units are incorporated into Air Permit to Construct No. ACP-18276 v1.0.

The facility’s potential to emit (PTE) is based on enforceable operational restrictions put in place on the curtailment response generator engines (EUs 5 through 7, 10, 13 through 15, 17 through 20). The restriction limits the allowable operation to 500 hours on a 12-month rolling average basis for each nonemergency generator engine. This restriction means the facility is a synthetic minor source of air pollution, as the emissions are limited to below major source thresholds for the Title V program.

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 Fargo Public Schools – Heating Plant following completion of a 30-day public comment period. The public comment period will run from April 4, 2025, through May 4, 2025.

MER:er

DRAFT