AIR QUALITY EFFECTS ANALYSIS
FOR
PERMIT TO CONSTRUCT
ACP-18264 v1.0

Applicant:

ONEOK Rockies Midstream, L.L.C.
100 West Fifth Street
Tulsa, Oklahoma 74103

Facility Location:

Alexander Compressor Station
NE¼, Sec. 1, T151N, R102W
Lat 47.934, Long -103.671
McKenzie County, North Dakota

Introduction and Background:

ONEOK Rockies Midstream, L.L.C. (ONEOK) submitted a minor source Permit to Operate (PTO) renewal application to the North Dakota Department of Environmental Quality – Division of Air Quality (Department) on February 19, 2024, for the Alexander Compressor Station. During the PTO renewal, the Department determined it would be appropriate to reevaluate the emission limits associated with the facility. Additionally, ONEOK has requested that synthetic minor limits be added to all their storage tanks and condensate truck loadout.

The facility's permit includes various emission limits on the compressor engines (EUs C1.3, C3.2 & C4) that limit the engine emissions below Title V major source threshold and/or below an applicable new source performance standard (e.g., NSPS Subpart JJJJ) for the engines. Per recent EPA guidance[1], limits such as these are considered synthetic minor limits.

Additionally, the limits represented in pound per hour (lb/hr) were recommended to be administratively revised to the equivalent in grams/hp-hr to be consistent with the regulatory standard(s) for the engines. See Condition 3 of ACP-18264 v1.0.

The SO_2 limit and stack height requirement for the emergency flare (EU F1.2) was reevaluated based on current ambient air quality standards, emission limit standards, and North Dakota Air Quality permitting requirements. The current SO_2 limit was implemented to ensure compliance with the North Dakota 1-hr SO_2 Ambient Air Quality standard. North Dakota's 1-hr SO_2 standard was in place prior to EPA's national 1-hr SO_2 standard released in 2010. North Dakota introduced the national standard into the North Dakota Administrative Code in 2011[2], lowering the allowable

[1] https://www.epa.gov/system/files/documents/2021-09/johndeere_52.21r4.pdf
[2] NDAC 33.1-15-02, Table 1 https://ndlegis.gov/information/acdata/pdf/33.1-15-02.pdf?20150602082326

1-hr SO_2 from 715 µg/m^3 to 196 µg/m^3. Therefore, the existing permit SO_2 limit and stack height requirements for the emergency flare no longer ensures compliance with the National Ambient Air Quality Standard (NAAQS) and will be removed from the PTO during renewal.

In addition, each emergency flares' potential to emit (PTE) and subsequent emission limit was based on the combustion of sour gas with significantly higher H_2S content (which primarily converts to SO_2 when combusted) than the gas currently received at the facility. Introduction of an SO_2 limit was common with North Dakota's pre-Bakken oil and (sour) gas production but is no longer appropriate for facilities which receive sweet (low H_2S) gas.

ONEOK requested the three condensate tanks (EUs TK-1 through TK-6) be limited to 5.99 tons per year (tpy) of VOC emissions per tank. This limit keeps the tanks below the threshold for NSPS OOOO applicability, and thus is a synthetic minor limit.

On February 25, 2020, the Department approved the use of 0.16 lb VOC per barrel of condensate as an emission factor for company-wide condensate truck loadout operations in North Dakota. As part of the approval, emissions of VOCs cannot exceed 20 tons in any 12-month period (rolling total). This approval is integrated into this permit.

Condition 3 of ACP-18264 v1.0 contains all emission unit limits applicable to the Alexander Compressor Station

Table 1 lists the current emissions units associated with the Alexander Compressor Station. Table 2 lists the current emission limits and the new emission limits proposed in this permit.

Table 1 - Source-wide Permitted Equipment.

Emission Unit Description	**Emission Unit (EU)**	**Emission Point (EP)**	**Air Pollution Control Equipment**
Caterpillar G3516B natural gas-fired compressor engine rated at 1,380 bhp manufactured after January 1, 2011 (NSPS JJJJ, OOOO; MACT ZZZZ)	C1.3	C1.3	Catalytic converter
Caterpillar G3516B natural gas-fired compressor engine rated at 1,380 bhp manufactured after January 1, 2011 (NSPS JJJJ, OOOO; MACT ZZZZ)	C3.2	C3.2	Catalytic converter
Caterpillar G3516B natural gas-fired compressor engine rated at 1,380 bhp manufactured after July 1, 2010 (NSPS JJJJ; MACT ZZZZ)	C4	C4	Catalytic oxidizer
Three 400 bbl condensate storage tanks	T1.2, T2.2 & T3.2	5	Submerged fill pipe & enclosed combustor
Enclosed combustor (NSPS OOOO)	5	5	None
Emergency flare	F1.2	F1.2	None
300 bbl methanol storage tank	T4 [A]	T4	None
Condensate truck loading	L1	L1	None

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Fugitive emissions	FUG [A]	FUG	None

[A] Insignificant or fugitive emission sources with no specific emission limit.

Table 2 – Current and Proposed Emission Limits

EU Description	EU	Pollutant / Parameter	Current Emission Limit [A]	Emission Limit [A]
Natural gas-fired engines	C1.3, C3.2, & C4	NO_X	3.04 lb/hr and 1.0 g/hp-hr or 82 ppmvd	1.0 g/hp-hr or 82 ppmvd @ 15% O2 [B]
		CO	5.32 lb/hr and 2.0 g/hp-hr or 270 ppmvd	1.75 g/hp-hr [B, C]
		VOC	0.70 gram/hp-hr or 60 ppmvd	0.7 g/hp-hr or 60 ppmvd @ 15% O2 [B]
		Opacity	20% [D]	20% [D]
Enclosed combustor	5	Opacity	20% [D]	0% [E]
Emergency flare	F1.2	SO_2	2,577 lb/hr	REMOVED
		Opacity	20% [F]	20% [F]
Condensate storage tanks	T1.2, T2.2 & T3.2	VOC	Not addressed in current permit(s)	5.99 tons/12-month period (rolling total) [G]
Condensate truck loading	L1	VOC	Not addressed in current permit(s)	20 tons/12-month period (rolling total) [H]

[A] The emission limit applies to each emission point (EP).

[B] Compliance determined via emissions testing.

[C] Less restrictive 40 CFR 60 Subpart JJJJ limits also apply as follows: CO of 2.0 g/hp-hr or 270 ppmvd @ 15% O2.

[D] 40% opacity is permissible for not more than one six-minute period per hour.

[E] The combustor shall be designed for and operated with no visible emissions, except for periods not to exceed a total of 1-minute during any 15-minute period.

[F] 60% opacity is permissible for not more than one six-minute period per hour.

[G] Emissions from each storage vessel shall be limited to less than 6 tons per year, per tank, on a 12-month rolling total basis, and are thus not subject sources under 40 CFR 60, Subpart OOOO per §60.5365(e).

[H] On February 25, 2020, the Department approved the use of 0.16 lb VOC/bbl of condensate as an emission factor for company-wide condensate truck loadout operations in North Dakota. As part of the approval, emissions of VOCs cannot exceed 20 tons in any 12-month period (rolling total).

Facility-Wide Emissions Profile
Potential to Emit (PTE)

Table 3 – PTE (tons per year)

Emission Unit Description	EU	NO_X	CO	VOCs	SO_2	PM
Caterpillar engine	C-1.3	13.3	23.3	9.3	0.0	0.0
Caterpillar engine	C-3.2	13.3	23.3	9.3	0.0	0.0
Caterpillar engine	C-4	13.3	23.3	9.3	0.0	0.0
400-bbl Condensate Tank	TK-1.2	-	-	6.0	-	-
400-bbl Condensate Tank	TK-2.2	-	-	6.0	-	-
400-bbl Condensate Tank	TK-3.2	-	-	6.0	-	-
Enclosed Combustor	5	0.2	0.4	0.0	0.0	0.0
Emergency Flare	FL-1.2	0.1	0.2	0.1	1.4	0.0
300-bbl Methanol Tank	TK-4	-	-	0.2	-	-
Condensate Truck Loading	TL-1	-	-	20.0	-	-
Fugitive Emissions	FUG	-	-	7.9	-	-
Misc Vent & Blowdowns	BD	-	-	9.9	-	-
	Total:	40.2	70.6	84.1	1.4	0.0

As shown in Table 3, the facility PTE is below 100 tons per year (tpy) for all criteria air pollutants. The facility PTE is based on enforceable emissions restrictions put in place limiting the allowable amount of CO and VOC. These restrictions mean the facility will be a synthetic minor source of air pollution, as the emissions are limited to avoid regulatory applicability and below thresholds for the prevention of significant deterioration (PSD) and/or Title V programs.

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.[3]

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 facility was not required. Based on the facility PTE and proposed stack heights, 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.

Applicability and Expected Compliance

Based on Department experience with the flare (EU F1.2) and non-flare sources (EUs C1.3, C3.2, & C4), the facility is expected to comply with the 20% opacity limit as applicable to each source. The enclosed combustor (EU 5) used to control vapors from the condensate storage tanks (EUs T1.2, 2.2, & 3.2) is necessary to avoid applicability to NSPS OOOO, and, as a result, shall comply with the requirements of 40 CFR 60.5412(d) in lieu of the Department's 20% opacity restriction. Based on Department experience with these onsite sources, compliance with these restrictions is expected.

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.

[3] 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

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

The facility is exempt from this chapter since each engine (EUs C1.3, C3.2, & C4) will be fired on gas containing no more than 2 grains of sulfur per 100 standard cubic feet.

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 condensate storage tanks (EUs T1.2, T2.2, & T3.2) comply with this chapter by being operated with a submerged fill pipe and with tank vapors being controlled using an enclosed combustor (EU 5).

The condensate truck loadout (EU L-1) does not have the potential to handle over 20,000 gallons per day of volatile organic liquids, therefore, it is not subject to the submerged fill arm requirement of 33.1-15-07-01.4.

The condensate truck loadout (EU L-1) has the potential to handle over 20,000 gallons per day of volatile organic liquids and will complies with this chapter by equipping and operating the loadout facility with a submerged fill arm.

For the emergency flare (EU F1.2) and enclosed combustor (EU 5), the facility will comply with this chapter by equipping and 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 engines (EUs C1.3, C3.2, & C4) 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 Alexander Compressor Station 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 C1.3, C3.2, & C4) are subject to the requirements of NSPS Subpart JJJJ. The facility engines are each rated at 1,380 horsepower (hp), were manufactured after 2010, and are equipped with a catalytic converter or catalytic oxidizer.

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 facility is restricted to lower engine emissions limits to avoid major source thresholds under Title V. As a result, Condition 3 of ACP-18264 v1.0 established the following limits:

- CO of 1.75 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 OOOO – Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After August 23, 2011, and On or Before September 18, 2015

Subpart OOOO establishes emission standards and compliance schedules for the control of volatile organic compounds (VOC) and sulfur dioxide (SO2) emissions from affected facilities in the crude oil and natural gas production source category that commence construction, modification, or reconstruction after August 23, 2011 and on or before September 18, 2015.

Applicability and Expected Compliance

The compressors driven by the natural gas compressor engines (EUs C1.3 & C3.2) and enclosed combustor (EU 5) are considered affected units under Subpart OOOO. The compressors are expected comply with the applicable standards for reciprocating compressors under Subpart OOOO, see 60.5385. The enclosed combustor is expected to comply with the applicable standards for storage vessel control devices under Subpart OOOO, see 60.5412(d).

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 currently has a minor source permit to operate. The facility will be considered a synthetic minor source via federally enforceable restrictions limiting the VOC emissions below 100 tons per year.

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

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[4] exceed 250 tpy (excluding fugitive emissions). The PTE for this facility, as shown in Table , is below the 250 tpy threshold and therefore not subject to PSD review.

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.

[4] 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)

Applicability and Expected Compliance

The stack height of the engines (EUs C1.3, C3.2, & C4) shall be at least 45 feet above ground level.

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.

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 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 engines (EUs C1.3, C3.2, & C4) are 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.

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.

This permit to construct was a result of an internal review and not fees are being assessed.

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 an existing source. Based on low PTE of visibility impairment pollutants, the facility is not expected to contribute to visibility impairment. Therefore, the facility is not subject to the requirements of this chapter.

Summary:

Air Permit to Construct (PTC) No. ACP-18264 v1.0 will establish the facility as a synthetic minor source. 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 Alexander Compressor Station following completion of a 30-day public comment period. The public comment period will run from April 15, 2025, through May 14, 2025.

Update post comment period:
[Reserved]

Date of Draft Analysis: April 10, 2025
Date of Final Analysis: MONTH DAY, YEAR

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