Hess North Dakota Pipelines LLC
Hawkeye Gas Facility
Title V Permit to Operate No. AOP-28417 v2.0
(Previously T5-O20005)
Statement of Basis
(April 11, 2025)

Facility Background: The Hess North Dakota Pipelines LLC (Hess), Hawkeye Gas Facility (HGF) provides natural gas transportation, storage, and gathering services in the surrounding area. Collected gas is compressed, dehydrated and piped to its destination. The HGF is located in McKenzie County, replaced the "old " facility (Hawkeye Compressor Station), and is positioned directly south of the "old " facility's site. The "old" compressor station was shut down and removed from service in August of 2017.

The HGF consists of ten natural gas-fired compressor engines rated from 400 bhp to 3,550 bhp; five, small natural gas-fired heaters; a natural gas-fired glycol dehydration unit; a natural gas-fired incinerator/thermal oxidizer as air pollution control for the ethylene glycol dehydration unit; six storage tanks; a process/emergency flare; and two natural gas engine-driven emergency generators. All of the compressor engines have catalytic converters, and all of the tanks have submerged fill pipes.

Chronology of significant events (not all-inclusive):

December 27, 2014 - Hess was issued the initial Air Quality Permit to Construct (PTC)14089 (ACP-17679 v1.0) for construction and initial operation of the HGF.

February 6, 2017 - Construction was complete and initial start-up activities began.

June and September 2017 and April and October 2018 - Initial testing for the compressor engines (all except EU CE-3) and emergency engines was completed.

April 2019 – Initial testing for the compressor engine EU CE-3 was completed. Based on testing results and the facility's potential to emit, the facility was considered an area source of criteria pollutants and hazardous air pollutant (HAP) emissions. However, based on actual, annual flaring in 2017 and 2018, emissions for CO and VOC were above 100 tons/year and the facility required a Title V Permit to Operate.

June 14, 2019 - An initial Title V application with a request to revise the initial construction permit was submitted.

February 12, 2020 - PTC14089 Amendment No. 1 was issued to permit process and emergency flaring with Title V potential emissions.

September 22, 2020 – The initial Title V Permit to Operate No. T5-O20005 (AOP-28417 v1.0) was issued for the Hawkeye Gas Facility and incorporated ACP-17679 v1.0 and the construction permit's Amendment No. 1.

Current Action: On March 21, 2025, the Department received a timely application through CERIS-ND from Hess North Dakota Pipelines LLC for renewal of the Hawkeye Gas Facility Title V Permit to Operate AOP-28417. All of the updates in the draft permit are administrative in nature.

The Department proposes to issue Title V Permit to Operate No. AOP-28417 v2.0 after the required 30-day public comment period and subsequent 45-day EPA review period of the draft permit. This statement of basis summarizes the relevant information considered during the issuance of the Title V permit. The legal basis for each permit condition is stated in the draft permit under the heading of "Applicable Requirement."

Applicable Programs/As-Needed Topics:

1. **Title V.** The facility requires a Title V Permit to Operate because actual annual CO and VOC emissions exceed the 100 tons per year (tpy) major source threshold. The facility is considered a minor/area source of HAP emissions because individual and combined potential annual HAP emissions are below 10 tpy and 25 tpy, respectively. A potential to emit table is provided on the last page of this document.

2. **New Source Performance Standards (NSPS).** The following NDAC 33.1-15-12-02 and 40 CFR 60 subparts apply to the facility.

   Subpart A, General Provisions, applies to all source units to which another NSPS subpart applies.

   Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (EU REFRIG #1, REFRIG #2, FLASH #1, FLASH #2, FLASH #3, INLET #1, INLET #2, INLET #3, INLET #4, INLET #5, EMGENENG1 and EMGENENG2). The engines are considered to be located at a remote area source.

   Subpart OOOO, Standards of Performance for Crude Oil and Natural Gas Production, Transmission and Distribution for which Construction, Modification or Reconstruction Commenced after August 23, 2011, and on or before September 18, 2015 (reciprocating compressors for REFRIG #1, REFRIG #2, FLASH #1, FLASH #2, FLASH #3, INLET #1, INLET #2, INLET #3, INLET #4 and INLET #5).

   Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels, does not apply to the tanks because their capacities are less than 75 cubic meters each.

3. **National Emission Standards for Hazardous Air Pollutants (NESHAP).** No NDAC 33.1-15-13 and 40 CFR 61 subparts apply to the facility, with the possible exception of NDAC 33.1-15-13-02 (40 CFR 61) Subpart M (National Emission Standard for Asbestos), which may apply during facility modifications involving asbestos.

4. **Maximum Achievable Control Technology (MACT).** The following NDAC 33.1-15-22-03 and 40 CFR 63 subpart applies to the facility, which is an area source of HAP emissions.

   Subpart A, General Provisions, applies to all source units to which another MACT subpart applies.

   Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, applies to the engines (EU REFRIG #1, REFRIG #2, FLASH #1, FLASH #2, FLASH #3, INLET #1, INLET #2, INLET #3, INLET #4, INLET #5, EMGENENG1 and EMGENENG2). As an area source of HAP emissions, compliance with this subpart is achieved through compliance with 40 CFR 60, Subpart JJJJ. North Dakota has not adopted the area source provisions of this subpart; all required reports and documentation are to be sent to EPA Region 8.

   Subpart HH does not apply because the facility is an area source of HAP emissions that maintains an ethylene glycol (EG) dehydrator (not a tri-ethylene glycol dehydrator); the controlled EG dehydrator benzene emissions are below 0.90 megagrams per year.

5. **Acid Rain.** NDAC 33.1-15-21 (40 CFR 72, 73, 75 and 76) does not apply to the facility since the plant is not an existing electric utility steam generating plant rated at greater than 25 MWe.

6. **Prevention of Significant Deterioration (PSD).** The facility is not a major source under NDAC 33.1-15-15 (40 CFR 52) because it does not have the potential to emit more than 250 tons of any criteria pollutant per year during normal operations; therefore, this permit is not subject to PSD review.

7. **BACT.** Since the facility is not a major PSD source and does not contain changes that increase the potential emissions by a PSD-significant amount, a BACT review is not required for this permit

8. **Gap Filling.** Monitoring not otherwise prescribed by rule was provided to ensure fuel-burning sources comply with the ND opacity standard, however, there were no changes to the gap filling requirements in this draft permit. The gap filling conditions are generally identified by the applicable requirement: NDAC 33.1-15-14-06.5.a(3)(a).

9. **Streamlining Decisions.** The NDAC 33.1-15-06-01.2 *Restrictions applicable to fuel burning installations* emission limit for sulfur (3.0 pounds of sulfur per million Btu) was streamlined because the standard ND natural gas fuel restriction for sulfur (2 grains/100 scf) is more stringent.

10. **Compliance Assurance Monitoring (CAM).** Does not apply as no pre-1990 NSPS or MACT, controlled units have an uncontrolled potential to emit (PTE) of ≥100 tons per year of any criteria pollutant.

11. **Permit Shield.** Does not apply because the permit to operate does not contain a permit shield.

12. **New Conditions/Limits.** Although considered administrative, this draft permit includes new limits and conditions for the clarification of applicable regulations and requirements. Specific modifications are identified in the "Permit Changes by Section" below.

13. **40 CFR 98 - Mandatory Greenhouse Gas Reporting.** This rule requires sources above certain emission thresholds or in certain supplier thresholds to calculate, monitor and report greenhouse gas emissions. According to the definition of "applicable requirement" in 40 CFR 70.2, neither Subpart 98, nor Clean Air Act Section 307(d)(1)(V), the CAA authority under which Subpart 98 was promulgated, are listed as applicable requirements for the purpose of Title V permitting. Although the rule is not an applicable requirement under 40 CFR 70, the source is not relieved from the requirement to comply with the rule separately from compliance with their Part 70 operating permit. It is the responsibility of each source to determine applicability to the subpart and to comply, if necessary.

Permit Changes by Section:

Note: Administrative changes were made to some sections of the permit to update to the current North Dakota (ND) format and to correct errors. In addition, the Permit to Operate number and references to Permit to Construct numbers have been updated to accommodate the Air Quality database (CERIS-ND). These changes may not be specifically addressed below.

Cover: The permittee name and expiration date were updated, and the permit number was revised to coincide with CERIS-ND.

Table of Contents: Page numbers were updated as necessary.

1. **Emission Unit Identification**: Emission unit descriptions, emission unit identifications and emissions point designations were updated in Table 1.1 as requested in the renewal application. Insignificant/fugitive emission sources were added (EU MeOHST, LOADCOND, LOADPRDWTR and FUG). The sources were existing but inadvertently omitted from the Title V permit during the issuance of the PTO. Footnote B was added for clarity on facility layout and controls for the storage tanks.

2. **Applicable Standards and Miscellaneous Conditions**: Per the renewal application, emission unit identifications and emissions point designations were updated throughout.

3. **Emission Unit Limits**: Emission unit identifications and emissions point designations were updated in Table 3.1.

4. **Monitoring Requirements and Conditions**: Emission unit identifications and emissions point designations were updated in Table 4.1. The emergency generator engine monitoring was updated to the current ND standard. Applicable monitoring for 40 CFR 63, Subpart OOOO was added for the reciprocating compressors subject to the subpart.

5. **Recordkeeping Requirements**: Emission unit identifications and emissions point designations were updated in Table 5.1. Applicable recordkeeping for 40 CFR 63, Subpart OOOO was added to Table 5.1 for the reciprocating compressors subject to the subpart. Applicable subparts recordkeeping was updated for clarity.

6. **Reporting**: Applicable subparts reporting was provided.

7. **Facility Wide Operating Conditions**: The Noncompliance Due to an Emergency condition (7.H) was removed per EPA's Affirmative Defense Provision Rule effective 8/21/23 and to reflect the current ND standard facility wide operating conditions. All subsequent condition lettering designations were updated.

8. **General Conditions**: Administrative updates were made to Condition Nos. 8.E and 8.M to reflect the current standard ND general conditions.

9. **State Enforceable Only Conditions (not Federally enforceable)**: No change.

Comments/Recommendations: It is recommended that Title V Permit to Operate No. AOP-28417 v2.0 be processed and considered for issuance following a 30-day public comment period and a subsequent 45-day EPA review period.

Facility-Wide Potential Emissions [A]

Pollutant	Tons Per Year Without Fugitives	Tons Per Year With Fugitives
PM	8.0	8.0
PM_{10}	8.0	8.0
$PM_{2.5}$	8.0	8.0
NO_x	113.9	113.9
SO_2	0.9	0.9
CO	115.3	115.3
VOC	126.0	153.4
Total HAPs	18.1	21.1
Largest Individual HAP (Formaldehyde)	9.0	9.0

[A] Based upon Title V renewal application information submitted through CERIS-ND on 3/21/2025.