

AIR POLLUTION CONTROL PERMIT TO CONSTRUCT

Permittee: Name: Energy Transfer, LP Address: 1300 Main Street Houston, Texas 77002	Permit Number: ACP-18248 v 1.0 Permit Description: Synthetic Minor
Source Name & Location: Latchem Compressor Station 11614 – 31M Street NW Watford City, North Dakota 58854 NE ¼, SE ¼, Sec. 27, T151N, R97W McKenzie County	Source Type: Compressor Station
Date of Application: <p style="text-align: center;">N/A</p>	

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

1. Project and Facility Emissions Units:

This Permit to Construct does not affect the operation of the facility emissions units and does not allow for the construction of any new equipment at the facility.

Table 1-1 lists the emissions units affected by this permit action.

Table 1-2 lists all emissions units permitted at Latchem Compressor Station.

Table 1-1: Emissions Units Modified

Emission Unit Description ^A	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Caterpillar G3516J (4SLB) natural gas-fired compressor engine rated 1,380 bhp (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOa) ^B	ENG-1, ENG-3 through ENG-8 ^C	ENG-1, ENG-3 through ENG-8	Oxidation Catalyst

^A All emission unit ratings are considered nominal ratings.

^B The compressors driven by the engines are subject to NSPS OOOOa.

^C There are no physical changes to these emissions units with this permit action.

Table 1-2: Facility Emissions Units

Emission Unit Description ^A	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Caterpillar G3516J (4SLB) natural gas-fired compressor engine rated 1,380 bhp (NSPS JJJJ & MACT ZZZZ) (NSPS OOOOa) ^B	ENG-1, ENG-3 through ENG-8	ENG-1, ENG-3 through ENG-8	Oxidation Catalyst
Triethylene glycol (TEG) dehydration unit rated at 30 MMscfd (MACT HH)	DEHY-1	BURN-1	BTEX Condenser & Burner (BURN-1)
TEG reboiler rated at 0.5 x 10 ⁶ Btu/hr	RBLR-1	RBLR-1	None
JATCO compound injector burner rated at 0.5 x 10 ⁶ Btu/hr	BURN-1	BURN-1	None
Indirect heater rated at 1.5 x 10 ⁶ Btu/hr	HTR-1	HTR-1	None
400-bbl Condensate tank	CT-1	FLR-1	Submerged fill pipe (SFP) & Flare (FL-1)

Emission Unit Description ^A	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
400-bbl Condensate tank	CT-2	FLR-1	SFP & Flare (FL-1)
400-bbl Produced water tank	PW-1	FLR-1	SFP & Flare (FL-1)
400-bbl Produced water tank	PW-2	FLR-1	SFP & Flare (FL-1)
Glycol tank	Various ^C	Various	None
Various lube/waste oil tanks	Various ^C	Various	None
Various jacket water tanks	Various ^C	Various	None
Various methanol tanks	Various ^C	Various	None
Truck loadout	TL-1 ^C	TL-1	None
Truck loadout	TL-2 ^C	TL-2	None
Tank flare (NSPS OOOOa)	FLR-1	FLR-1	None
Fugitive emissions (NSPS OOOOa)	FUGL	FUGL	Leak Detection & Repair (LDAR) Program

^A All emission unit ratings are considered nominal ratings.

^B The compressors driven by the engines are subject to NSPS OOOOa.

^C Insignificant or fugitive emission source (no specific emission limits).

2. Applicable Standards, Restrictions and Miscellaneous Conditions:

The applicable standards, restrictions, and other miscellaneous conditions set forth in ACP-17924 v1.0 for the facility are not affected with this permit action.

3. Emission Unit Limits:

Emission limits from the operation of the source unit(s) identified in Table 1-1 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.

Upon issuance of this permit, the emission limits set forth in the previous Air Permit to Construct No. ACP-17924 v1.0 (PTC19020) for the facility engines (EUs ENG-1, ENG-3 through ENG-8) are rescinded in their entirety. The emission limits are replaced with the following:

Table 3-1: Permit Emissions Limits

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Pollutant / Parameter	Emission Limit
Natural gas-fired compressor engines	ENG-1, ENG-3 through ENG-8	ENG-1, ENG-3 through ENG-8	NO _x	0.7 g/hp-hr ^{A, B}
			CO	0.7 g/hp-hr ^{A, B}
			VOC	0.7 g/hp-hr or 60 ppmvd @ 15% O ₂ ^A
			Opacity	20% ^C

- ^A Compliance determined via emissions testing. The engines must also comply with any applicable emission limits established by 40 CFR 63, Subpart ZZZZ.
- ^B Less restrictive 40 CFR 60 Subpart JJJJ limits also apply as follows: NO_x of 1.0 g/hp-hr or 82 ppmvd @ 15% O₂ and CO of 2.0 g/hp-hr or 270 ppmvd @ 15% O₂.
- ^C 40% opacity is permissible for not more than one six-minute period per hour.

4. Emission Testing Requirements:

A. 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.
- 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. 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.

B. 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.

C. 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.

D. 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.

E. 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.

F. 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.

G. Nuisance or Danger:

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

H. Transfer of Permit to Construct:

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

I. 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.

J. 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.

K. 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.