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MEMO TO : File  
Plains Pipeline, L.P.  
Manitou Rail Terminal  
Mountrail County

FROM : Kari Thorsteinson  
Environmental Scientist  
Division of Air Quality

RE : Lowered Throughput Limit on Permit

DATE : June 17, 2025

**Information and Discussion:**

Plains Pipeline, L.P. operates the Manitou Rail Terminal (facility) under Air Permit to Operate No. AOP-27986 v2.0. Plains Pipeline, L.P. has requested that synthetic minor limits for the railcar crude oil loadout (EU 1) be lowered. Additionally, they requested that the butane injection system and 10,000-gallon diesel tank that had previously been approved with No Permit Required letters be added to the permit.

**Emission Units:**

A butane injection system was approved as No Permit Required for the facility on February 18, 2025, via email. A 10,000-gallon diesel tank was approved as not requiring a permit for the facility in 2023. These insignificant units were added to the table of emission units.

**Product Throughput Limits:**

Plains Pipeline, L.P. has requested that synthetic minor limits for the railcar crude oil loadout (EU 1) be lowered from 43,800,000 barrels per year (bbl/yr) to 36,500,000 bbl/yr. This change lowers the potential to emit of VOCs for the vapor combustor units from 76.80 tons per year (tons/yr) to 64.02 tons/yr. A more detailed potential to emit for the facility was included in the Permit to Construct application.

**Conclusion:**

Permit to Construct No. ACP-17412 v1.0 will be amended to update the product throughput limit table. The facility remains a synthetic minor source based on the product throughput limits for the railcar crude oil loadout (EU 1). An air quality effects analysis is not needed as there are no physical changes at the facility, changes to regulatory applicability, or new permit requirements. The potential emissions are lower with this permit action. The Department will make a final recommendation on the issuance of a Permit to Construct for the Manitou Rail Terminal following completion of a 30-day public comment period. The public comment period will run from June 21, 2025, through July 20, 2025.

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