AIR QUALITY EFFECTS ANALYSIS
FOR
PERMIT TO CONSTRUCT
ACP-18275 v1.0

Applicant:

North Dakota Mill and Elevator
P.O. Box 13078
Grand Forks, North Dakota 58203

Facility Location:

North Dakota Mill
1823 Mill Road
Grand Forks, North Dakota 58203
NE¼ SW¼, Sec. 33, T152N, R50W
Grand Forks County

Introduction:

North Dakota Mill and Elevator (NDME or facility) submitted a permit to construct application to the North Dakota Department of Environmental Quality – Division of Air Quality (Department) on November 15, 2024. Supplemental information was provided via email on March 25, 2025. The application was for two diesel fired generator engines (Project) at the existing facility in Grand Forks County, North Dakota.

NDME currently operates under Permit to Operate AOP-27238 v3.1, which expires on October 17, 2025. Upon Project completion, the facility will be reclassified as a synthetic minor source under the prevention of significant deterioration (PSD) and Title V programs.

Table 1-1 of ACP-18275 v1.0 lists the emissions units associated with the Project.

Facility Wide Emissions Profile
Potential to Emit (PTE)

Table 1 – PTE (tons per year) [A]

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
Grain Terminal System "A"	1	1	--	--	--	--	2.4	1.2	1.2	--
Grain Terminal System "B"	2	2	--	--	--	--	0.7	0.3	0.3	--
Grain Terminal System "C"	3	3	--	--	--	--	0.6	0.3	0.3	--
Grain Terminal System "D	4	4	--	--	--	--	0.4	0.2	0.2	--
Grain Terminal System "1"	5	5	--	--	--	--	4.0	2.0	2.0	--
Grain Terminal Systems “2” & “3”	6 (Captured)									
Grain Terminal System “4”	7	6	--	--	--	--	2.6	1.3	1.3	--
Pit 5	51 (Captured)	7	--	--	--	--	0.2	0.1	0.1	--
Silos 901-904 Loading	52	52	--	--	--	--	1.9	1.0	1.0	--
Silos 901-904 Unloading	53	53	--	--	--	--	1.6	0.8	0.8	--
Wheat Cleaning System "A"	8	8	--	--	--	--	0.5	0.2	0.2	--
Wheat Cleaning System "B"	9	9	--	--	--	--	0.4	0.2	0.2	--
Wheat Cleaning System "C"	10	10	--	--	--	--	0.2	0.1	0.1	--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
Wheat Cleaning System "D"	11	11	--	--	--	--	0.1	0.1	0.1	--
Wheat Cleaning System "WW"	12	12	--	--	--	--	0.6	0.3	0.3	--
Wheat Cleaning System "K"	13	13	--	--	--	--	0.2	0.1	0.1	--
Wheat Cleaning System "G"	14	14	--	--	--	--	0.1	0.0	0.0	--
Wheat Cleaning System "H"	58	80	--	--	--	--	0.1	0.0	0.0	--
Wheat Cleaning System "I"	59	81	--	--	--	--	0.1	0.1	0.1	--
A Mill *(Roman Meal - gen. exhaust)* *(Vac. system for A/B building)*	15 16 17	15-17 18 19	--	--	--	--	6.8	3.4	3.4	--
B Mill *(Roman Meal - gen. exhaust)* *(Vac. system for A/B building)*	18 16 17	20-23 18 19	--	--	--	--	6.8	3.4	3.4	--
C Mill	19	24/25	--	--	--	--	3.4	1.7	1.7	--
K Mill *(Vac. system for K/D building)*	20 21	26-29 30	--	--	--	--	9.8	4.9	4.9	--
E Mill	22	31	--	--	--	--	0.9	0.4	0.4	--
WW Mill *(WW - gen. exhaust)*	23 24 21	32 34 30	--	--	--	--	0.9	0.4	0.4	--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
(Vac. system for K/D building)										
D Mill *(Vac. system for K/D building)*	25 21	35-38 30	--	--	--	--	2.6	1.3	1.3	--
G Mill	26	39-42	--	--	--	--	9.8	4.9	4.9	--
H Mill	56	74-77	--	--	--	--	4.0	2.0	2.0	--
I Mill	57	78/79	--	--	--	--	2.7	1.3	1.3	--
HML -401	60	82	--	--	--	--	1.2	1.0	1.0	--
HML - 402	61									
Midds Conveyance #1	62									
Midds Bins	63									
BIN-206	64									
Midds Conveyance #2	67	83	--	--	--	--	0.0	0.0	0.0	--
BIN - 301 Flour Bin	68	84	--	--	--	--	0.0	0.0	0.0	--
PML-501	65	85	--	--	--	--	2.5	0.2	0.0	--
Pellet Cooler #1	69									
PML-502	66	86	--	--	--	--	2.5	0.2	0.0	--
Pellet Cooler #2	70									
BIN - 205 Bentonite Bin	71	87	--	--	--	--	0.8	0.4	0.4	--
Midds Blower	72	88	--	--	--	--	1.6	0.9	0.9	--
Bentonite Blower	73	89	--	--	--	--	0.2	0.1	0.1	--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
20 Bulk Flour Bin and loadout System - General Material Handling	27	43	--	--	--	--	2.7	1.5	1.5	--
Receiving Filter from A/B mill to Bulk Loadout	28	44	--	--	--	--	0.9	0.5	0.5	--
Receiving Filter from C mill to Bulk Loadout	29	45	--	--	--	--	0.4	0.2	0.2	--
Receiving Filter from K mill to Bulk Loadout	30	46	--	--	--	--	1.2	0.7	0.7	--
Blend Tank to Bulk Tank - A Line	31	47/48	--	--	--	--	1.0	0.5	0.5	--
Blend Tank to Bulk Tank - B Line	32	49/50	--	--	--	--	0.8	0.4	0.4	--
Pelletizing System Filter	34	72	--	--	--	--	1.7	0.2	0.0	--
Flour Loadout Vacuum System	36	55	--	--	--	--	0.0	0.0	0.0	--
Flour blending bulk plant filter	38	57	--	--	--	--	2.7	1.5	1.5	--
4 bulk flour bins (each have their own filter)	54	70	--	--	--	--	1.2	0.7	0.7	--
9 bulk flour bins (each have their own filter)	55	71	--	--	--	--	1.2	0.7	0.7	--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
Rail Track #1 Cleaning System	39	58	--	--	--	--	0.0	0.0	0.0	--
Rail Track #2 Cleaning System	40	59	--	--	--	--	0.0	0.0	0.0	--
Animal Feed Loadout	41	60	--	--	--	--	0.7	0.2	0.2	--
Pellet Loadout (rail)	42	61	--	--	--	--	0.2	0.0	0.0	--
Bemis (whole wheat) Packaging	43	62	--	--	--	--	0.1	0.1	0.1	--
Fawema Packaging	44	63	--	--	--	--	0.1	0.1	0.1	--
B1 (Sifter) Packaging	45	64	--	--	--	--	0.8	0.5	0.5	--
PT Packaging	46	65	--	--	--	--	0.9	0.5	0.5	--
Boiler 10.45 MMBtu/hr	47	66	3.8	6.6	0.8	0.4	0.4	0.4	0.4	0.1
Boiler 16.74 MMBtu/hr	48	67	6.1	10.5	1.2	0.6	0.6	0.6	0.6	0.1
Boiler 14.645 MMBtu/hr	49	68	5.3	9.2	1.1	0.6	0.5	0.5	0.5	0.1
Generator 2647 BHP	50	69	1.2	8.5	0.1	7.4	8.1	8.1	8.1	0.1
Generator 2919 BHP	74 [B]	90	6.7	19.6	0.0	3.7	1.5	1.5	1.5	0.0
Generator 2919 BHP	75 [B]	91	6.7	19.6	0.0	3.7	1.5	1.5	1.5	0.0
Grain Terminal Systems "2" & "3" (Existing Receiving System)	6 (Uncaptured)	FUG-1	--	--	--	--	15.5	4.4	0.7	--

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	PM	PM_{10}	$PM_{2.5}$	Total HAPs
Pit 5	51 (Uncaptured)	FUG-2	--	--	--	--	49.5	14.6	2.5	--
Total (without Fugitives):			**29.7**	**74.0**	**3.2**	**16.5**	**102.3**	**55.7**	**55.1**	**0.5**
Total (with Fugitives):			**29.7**	**74.0**	**3.2**	**16.5**	**167.2**	**74.7**	**58.3**	**0.5**

[A] Abbreviations:
PM: filterable and condensable particulate matter
$PM_{2.5}$: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 2.5 microns (≤2.5 µm)
PM_{10}: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 10 microns (≤10 µm) including $PM_{2.5}$
SO_2: sulfur dioxide
NO_X: oxides of nitrogen
CO: carbon monoxide
VOCs: volatile organic compounds
HAPs: hazardous air pollutants as defined in Section 112(b) of the Clean Air Act

[B] New Unit

As shown in Table 1, the facility wide PTE is below 100 tons per year (tpy) for all criteria air pollutants[1], below 10 tpy for any single hazardous air pollutant (HAP), and below 25 tpy for the combined HAP emissions. Detailed calculations have been provided in the permit application received on November 15, 2024, and revised on March 25, 2025. The Department has reviewed these calculations and believes they accurately represent the facility operations.

The facility PTE is based on enforceable emissions and hours restrictions on the Project's diesel fired generating units (EUs 74 & 75), meaning the facility will be reclassified as a synthetic minor source of air pollution under Title V and PSD.

[1] Particulate matter for Title V applicability is based on PM_{10} (or $PM_{2.5}$) and not PM. See: https://www.epa.gov/sites/default/files/2015-08/documents/pmregdef.pdf (Last visited July 30, 2024)

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[2].

Applicability and Expected Compliance

The facility is not subject to PSD, nor does the Project's PTE trigger the modeling thresholds listed in the "Criteria Pollutant Modeling Requirements for a Permit to Construct", therefore, preconstruction modeling for this Project was not required. Based on the facility PTE post Project, 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.

[2] 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

Applicability and Expected Compliance

Project engines (EUs 74 & 75) will be fired on ultra-low sulfur diesel fuel and will undergo routine maintenance; therefore, the units are expected to operate well below the 20% limit stated in the rule.

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.

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

Particulate matter emissions from the Project engines are subject to the requirements under NSPS Subpart IIII. NSPS IIII limits are more restrictive than this chapter and compliance with NSPS IIII is used to demonstrate compliance with 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 (3.0 lb SO_2/MMBtu) 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 Project engines (EUs 74 & 75) are not subject to a SO_2 emission limit under a new source performance standard (NSPS). EUs 74 and 75 will burn ultra-low sulfur diesel (ULSD)[3], thereby ensuring compliance with the sulfur restrictions in this chapter as part of its physical and operational design.

[3] ULSD contains approximately 15 ppm sulfur, which roughly equates to 0.001515 lb SO_2/MMBtu or 1.21×10^{-5} lb SO_2/hp-hr.

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 facility is not considered an organic compound facility and is not subject to the requirements of this chapter.

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 Project engines (EUs 74 & 75) are also subject to opacity requirements under NDAC 33.1-15-03-02 and subject to the requirements of NSPS Subpart IIII. 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 Project 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 IIII – Standards of Performance for Stationary Compressor Ignition Internal Combustion Engines

This subpart applies to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines. It covers provisions and requirements related to emission standards, certification, labeling and recordkeeping, performance tests, monitoring requirements, and compliance with standards and maintenance requirements. The subpart also includes definitions and general provisions that apply to the regulations.

Applicability and Expected Compliance

The Project engines (EUs 74 & 75) are subject to NSPS IIII. The engines will have a maximum rating capacity of 2,919 horsepower (Hp) each and were manufactured after April 1, 2006. Each engine is equipped with an oxidation catalyst to reduce CO emissions.

The engines will comply with the following emission standards:
- NOx of 9.2 g/KW-hr or 6.9 g/HP-hr
- CO: 11.4 g/KW-hr or 8.5 g/HP-hr
- PM: 0.54 g/KW-hr or 0.4 g/HP-hr
- Hydrocarbon (HC): 1.3 g/KW-hr or 1 g/HP-hr

Beyond the NSPS IIII limits, the Project engines are restricted to lower NO_X and CO limits to avoid major source thresholds under Title V. *Note: PM and HC emissions standards established by NSPS IIII were not restricted beyond the NSPS IIII limit*.

Table 3-1 of ACP-18275 v1.0 established the following limits:
- NOx of 5.3 g/hp-hr
- CO of 1.8 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 IIII requirements by implementing a maintenance plan and keeping records of conducted maintenance.

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 has submitted an application for a permit to construct and has met all requirements necessary to obtain a permit to construct. The facility will be considered a synthetic minor source via federally enforceable restrictions limiting the criteria air pollutants PTE below 100 tons per year (Nox and CO).

The permit must undergo public comment per NDAC 33.1-15-14-02.6.

Once the Project completes construction and meets the permit to construct requirements a facility inspection will be performed, and the facility will be issued an updated permit to operate by the Department.

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 1, 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.

Applicability and Expected Compliance

The proposed stacks for the Project do not exceed GEP and will not use dispersion techniques to affect the pollutant concentration in the ambient air.

[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)

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. As shown in the Table 1, total potential HAPs from the facility are approximately 0.5 tons/year.

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 Project engines (EUs 74 & 75) 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 IIII.

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.

The applicant has paid the $325 filing fee and may be required to pay the additional fees associated with the permit processing.

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 and based on low PTE of visibility impairment pollutants is not expected to contribute to visibility impairment. Therefore, the facility is not subject to the requirements of this chapter.

Summary:

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 North Dakota Mill and Elevator following completion of a 30-day public comment period. The public comment period will run from April 11, 2025, through May 11, 2025.

Update post comment period:
[Reserved]

Date of Draft Analysis: April 9, 2025
Date of Final Analysis: [Reserved]

Analysis By:

David Stroh
Manager, Permit Program
Division of Air Quality

DS:er