NORTH Dakota | Environmental Quality

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September 6, 2024

Sam Hong
Sr. Engineer – Environmental
Energy Transfer, LP
1300 Main Street
Houston, TX 77002

Re: Air Quality
Title V (Initial)
Permit to Operate

Dear Mr. Hong:

Pursuant to the Air Pollution Control Rules of the State of North Dakota, the Department of Environmental Quality has reviewed your permit application dated March 22, 2024, for the Wild Basin Gas Processing & Crude Handling Facility located in McKenzie County, North Dakota.

Enclosed is a copy of the Department's draft/proposed Title V Permit to Operate and statement of basis for the facility. Before making final determinations on the permit application, the Department provides for public comment by means of the enclosed public notice, to be immediately followed by a 45-day Environmental Protection Agency (EPA) review period. As indicated in the notice, the 30-day public comment period will begin September 12, 2024 and end October 11, 2024.

If any changes are subsequently made to the draft permit, then a review copy of the proposed permit reflecting those changes will be provided to EPA prior to the start of a 45-day EPA review period. The 45-day EPA review period is scheduled to begin October 12, 2024 and end November 25, 2024.

All comments received will be considered in the final determination concerning issuance of the permit. The Department will take final action on the permit application following the public comment period and the EPA review period. You will be notified in writing of our final determination.

If you have any questions, please contact me at (701)328-5218 or email kkschneider@nd.gov.

Sincerely,

Kyla K. Schneider
Environmental Scientist
Division of Air Quality

KKS:er
Enc:
xc/enc: EPA Region 8, Air Permitting (email – r8airpermitting@epa.gov)

NOTICE OF INTENT TO ISSUE AN
AIR POLLUTION CONTROL
TITLE V
PERMIT TO OPERATE

Take notice that the North Dakota Department of Environmental Quality (NDDEQ) proposes to issue an Air Pollution Control Permit to Operate to Rough Rider Operating, LLC, a subsidiary of Energy Transfer, LP for operation of the Wild Basin Gas Processing & Crude Handling Facility in accordance with the ND Air Pollution Control Rules. The Wild Basin Gas Processing & Crude Handling Facility is located at 12170 - 31st Street NW, Watford City in McKenzie County, ND. The facility handles crude oil and processes natural gas for delivery to market. The Energy Transfer, LP mailing address is 1300 Main Street, Houston, TX 77002. The draft permit incorporates construction permits ACP-17910 v1.0, ACP-17945 v1.0 and ACP-18195 v.1.0.

A thirty-day public comment period for the draft permit will begin September 12, 2024 and end on October 11, 2024. Direct comments in writing to the NDDEQ, Division of Air Quality, 4201 Normandy Street 2nd Floor, Bismarck, ND 58503-1324 or email AirQuality@nd.gov, Re: Public Comment Permit No. AOP-28573 v1.0. Please note that, to be considered, comments submitted by email must be sent to the email address listed; comments sent to any other email address **will not** be considered. Comments must be received by 11:59 p.m. central time on the last day of the public comment period to be considered in the final permit determination. A public hearing regarding issuance of the permit will be held if a significant degree of public interest exists as determined by the NDDEQ. Requests for a public hearing must be received in writing by the NDDEQ before the end of the public comment period.

The notice, draft permit, statement of basis and application are available for review at the NDDEQ address and at the Division of Air Quality website at https://deq.nd.gov/AQ/PublicCom.aspx. A copy of these documents may be obtained by writing to the Division of Air Quality or contacting Kyla Schneider at (701)328-5218 or emailing kkschneider@nd.gov.

The NDDEQ will consider every request for reasonable accommodation to provide an accessible meeting facility or other accommodation for people with disabilities, language interpretation for people with limited English proficiency (LEP), and translations of written material necessary to access programs and information. Language assistance services are available free of charge to you. To request accommodations or language assistance, contact the NDDEQ Non-discrimination/EJ Coordinator at 701-328-5150 or deqEJ@nd.gov. TTY users may use Relay North Dakota at 711 or 1-800-366-6888.

Dated this 6th day of September 2024

James L. Semerad
Director
Division of Air Quality

AIR POLLUTION CONTROL
TITLE V PERMIT TO OPERATE

Permittee: **Name:** Rough Rider Operating, LLC, a subsidiary of Energy Transfer, LP **Address:** 1300 Main Street Houston, TX 77002	**Permit Number:** AOP-28573 v1.0 **Source Name:** Wild Basin Gas Processing and Crude Handling Facility
Source Location: 12170 – 31st Street NW Watford City, ND 58854 NW ¼, Sec. 35, T151N, R98W McKenzie County	**Source Type:** Natural Gas Processing and Crude Oil Storage: Pipeline/LACT
Expiration Date: TBD	

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 (NDAC), and in reliance on statements and representations heretofore made by the permittee (i.e., owner) designated above, a Title V Permit to Operate is hereby issued authorizing such permittee to operate the emissions units at the location designated above. This Title V Permit to Operate 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 on the following pages. All conditions are enforceable by EPA and citizens under the Clean Air Act unless otherwise noted.

Initial: TBD

James L. Semerad
Director
Division of Air Quality

Wild Basin Gas Processing and Crude Handling Facility
Title V Permit to Operate
Table of Contents

Condition		Page No.
1.	Emission Unit Identification	3
2.	Applicable Standards, Restrictions and Miscellaneous Conditions	6
3.	Emission Unit Limits	9
4.	Monitoring Requirements and Conditions	11
5.	Recordkeeping Requirements	13
6.	Reporting	15
7.	Facility Wide Operating Conditions	17
8.	General Conditions	23
9.	State Enforceable Only Conditions (not Federally enforceable)	29

1. **Emission Unit Identification:**

The emission units regulated by this permit are as follows:

Table 1.1 Emission Unit Identification

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Gas Plant 1 & 2			
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-1 (C-001)	ENG-1	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-2 (C-002)	ENG-2	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-3 (C-003)	ENG-3	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-4 (C-004)	ENG-4	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-5 (C-107)	ENG-5	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-6 (C-108)	ENG-6	Oxidation Catalyst
Caterpillar 3608LE (4SLB) natural gas-fired compression engine rated at 2,370 bhp (2015) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-7 (C-109)	ENG-7	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-8 (C-1031)	ENG-8	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-9 (C-1041)	ENG-9	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-10 (C-1051)	ENG-10	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-11 (C-1061)	ENG-11	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-12 (C-1271)	ENG-12	Oxidation Catalyst

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-13 (C-1281)	ENG-13	Oxidation Catalyst
Caterpillar G3616A4 (4SLB) natural gas-fired compression engine rated at 5,000 bhp (2017) (NSPS JJJJ, OOOOa; NESHAP/MACT ZZZZ)	ENG-14 (C-1291)	ENG-14	Oxidation Catalyst
Triethylene glycol (TEG) dehydration unit rated at 200 MMscf/day (NESHAP/MACT HH)	DEHY-1	DEHY-1/ EC-3/ VRU-1	Enclosed Combustor (EC-3)/VRU [C]
Fuel gas-fired Tulsa heaters circulation system combustion heater rated at 46 x 10^6 Btu/hr (NSPS Dc)	HTR-1	HTR-1	None
Fuel gas-fired hot oil heater rated at 86.58 x 10^6 Btu/hr (NSPS Dc)	HTR-7	HTR-7	None
Enclosed combustor (TEG dehydration unit)	EC-3	EC-3	None
Plant 1 flare	E-1	E-1	None
Plant 2 flare	FLR-1 (FL-7203)	FLR-1	None
500-gallon methanol storage tank	MT-1 [A] (TK-117)	MT-1	Submerged Fill Pipe (SFP)
Three 210 bbl compressor lube oil storage tanks	LT-1 [A] through LT-3 [A] (TK-102, TK-7121 & TK-7131)	LT-1 through LT-3	SFP
Slop truck loading	STL-1 [A]	STL-1	None
400 bbl slop water tank	ST-1 [A] (TK-101)	ST-1	SFP
400 bbl slop oil tank	ST-3 [A] (TK-7188)	ST-3	SFP
210 bbl TEG storage tank	GT-1 [A] (TK-6051)	GT-1	None
202 bbl JW/coolant tank	WT-1 [A] (TK-103)	WT-1	None
210 bbl JW/coolant tank	WT-2 [A] (TK-7133)	WT-2	None
MSS - pigging	MSS-PIG [A]	MSS-PIG	None
MSS - compressor blowdowns	MSS-Comp [A]	MSS-Comp	None
MSS - vessel blowdowns (inlet)	MSS-Vessel1 [A]	MSS-Vessel1	None
MSS - vessel blowdowns (residue)	MSS-Vessel2 [A]	MSS-Vessel2	None

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
MSS - tank cleaning	MSS-Tank Cleaning [A]	MSS-Tank Cleaning	None
MSS – tank roof landings/cleanings/venting	MSS-IFR Tanks [A]	MSS-IFR Tanks	None
Fugitives	FUG-1 [A]	FUG-1	None
Crude Stabilization Facility			
51,459 bbl crude oil storage tank (NSPS Kb)	CT-1 [A] (Tank No. 601)	CT-1	Internal Floating Roof (IFR) & SFP
106,862 bbl crude oil storage tank (NSPS Kb)	CT-2 [A] (Tank No. 1201)	CT-2	IFR & SFP
56,080 bbl crude oil storage tank (NSPS Kb)	CT-3 [A] (Tank No. 602)	CT-3	IFR & SFP
Six 1,000 bbl each crude oil stock tanks (NSPS Kb)	STC-1 [A], STC-2 [A], STC-3 [A], STC-4 [A], STC-5 [A] & STC-6 [A] (T-103 through T-108)	EC-2/ VRU-1	Enclosed Combustor (EC-2)/VRU [B]
Six fuel gas-fired crude stabilization heaters [each burner (EU) rated at 1.6×10^6 Btu/hr]	HTR-2a [A], HTR-2b [A], HTR-2c [A] HTR-2d [A], HTR-2e [A] & HTR-2f [A]	HTR-2a through HTR-2f	None
Six fuel gas-fired crude stabilization heaters [each burner (EU) rated at 1.6×10^6 Btu/hr]	HTR-3a [A], HTR-3b [A], HTR-3c [A], HTR-3d [A], HTR-3e [A] & HTR-3f [A]	HTR-3a through HTR-3f	None
Six fuel gas-fired crude stabilization heaters [each burner (EU) rated at 1.6×10^6 Btu/hr]	HTR-5a [A], HTR-5b [A], HTR-5c [A], HTR-5d [A], HTR-5e [A] & HTR-5f [A]	HTR-5a through HTR-5f	None
Enclosed combustor (crude oil stock tanks)	EC-2	EC-2	None
Vapor recovery unit	VRU-1 [A, C] (C-1100)	VRU-1	None
1,000-gallon diesel storage tank	DT-2 [A]	DT-2	None
MSS - water loadout	WTL-1 [A]	WT-1	None

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
1,990 bbl compressor lube oil storage tank	LT-4 [A] (TK-7187)	LT-4	None
Fugitive crude oil stabilization	FUG-2 [A]	FUG-2	None
Facility-wide			
Diesel engine driven emergency generator rated at 85 bhp; Tier III certified (NSPS IIII; NESHAP/MACT ZZZZ)	GEN-1 [A, D]	GEN-1	None
62-gallon generator diesel tank	DT-1 [A]	DT-1	None

[A] Insignificant or fugitive emission sources (no specific emission limit). Fugitive emissions subject to 40 CFR 60, Subpart OOOO or Subpart OOOOa must conduct leak detection and repair in accordance with the applicable regulation.

[B] The enclosed combustor is the primary emission control device and the VRU is the secondary emission control device.

[C] The recovered vapors are routed into the natural gas processing plant for reprocessing; therefore, no expected emissions will result from the unit.

[D] The potential to emit for an emergency stationary reciprocating internal combustion engine (RICE) is based on operating no more hours per year than is allowed by the subpart (40 CFR 60, Subpart IIII and 40 CFR 63, Subpart ZZZZ) for other than emergency situations. For engines to be considered emergency stationary RICE under the RICE rules, engine operations must comply with the operating hour limits as specified in the applicable subparts. There is no time limit on the use of emergency stationary RICE in emergency situations [40 CFR 60, Subpart IIII, §60.4211(f) and 40 CFR 63, Subpart ZZZZ, §63.6640(f)].

2. **Applicable Standards, Restrictions and Miscellaneous Conditions**:

A. **Fuel Restrictions**:

1) The engines (EU ENG-1 through ENG-14), heaters (EU HTR-1, HTR-7, HTR-2a through HTR-2f, HTR-3a through HTR-3f and HTR-5a through HTR-5f) are restricted to combusting field gas or natural gas containing no more than 2 grains of sulfur per 100 standard cubic feet.

2) The emergency generator engine (EU GEN-1) is restricted to combusting distillate oil containing no more than 0.0015 percent sulfur by weight.

Applicable Requirements: ACP-17910 v1.0, ACP-17945 v1.0, ACP-18195 v1.0 and NDAC 33.1-15-14-06.5.b(1)

B. **Stack Heights**: The stack height of each engine (EU ENG-1 through ENG-14) shall be at least 1.5 times the nearby building height. A nearby building is any building located a distance of less than five times the building height from the stack.

Applicable Requirements: ACP-17910 v1.0

C. **New Source Performance Standards (NSPS)**: The permittee shall comply with all applicable requirements of the following NDAC 33.1-15-12-02 and 40 CFR 60 subparts in addition to complying with Subpart A – General Provisions.

1) Subpart Dc - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (EU HTR-1 and HTR-7).

2) Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction or Modification Commenced after July 23, 1984 (EU CT-1 through CT-3 and STC-1 through STC-6).

3) Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (EU GEN-1).

4) Subpart JJJJ - Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (EU ENG-1 through ENG-14).

5) Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (reciprocating compressors for EU ENG-1 through ENG-14, FUG-1 and FUG-2).

Applicable Requirements: NDAC 33.1-15-12-02, Subparts A, Dc, Kb, IIII, JJJJ and OOOOa

D. **National Emission Standards for Hazardous Air Pollutants (NESHAP)/Maximum Achievable Control Technology (MACT)**: The permittee shall comply with all applicable requirements of the following NDAC 33.1-15-22-03 and 40 CFR 63 subparts in addition to complying with Subpart A - General Provisions.

1) Subpart HH - National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (EU DEHY-1). The North Dakota Department of Environmental Quality has not adopted the area source provisions of this subpart. Please send all documentation to EPA at the following address.

U.S. EPA Region 8
1595 Wynkoop Street
Mail Code 8ENF-AT
Denver, CO 80202-1129

2) Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (EU ENG-1 through ENG-14 and GEN-1). As an area source of HAP emissions, compliance with 40 CFR 60, Subparts IIII and JJJJ constitute compliance with 40 CFR 63, Subpart ZZZZ. The North Dakota Department of

Environmental Quality has not adopted the area source provisions of this subpart. Please send all documentation to EPA at the address above.

Applicable Requirements: 40 CFR 63, Subparts A, HH and ZZZZ

E. **Flaring Restrictions**:

1) When it is necessary to operate the flares (EU E-1 and FLR-1) or combustors (EC-2 and EC-3) during emergency, malfunction or maintenance, all precautions shall be taken to minimize emissions and maintain compliance with the applicable ambient air quality standards as outlined in NDAC 33.1-15-02 and the opacity standards.

2) Each of the flares (EU E-1 and FLR-1) and combustors (EU EC-2 and EC-3) must be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order as outlined in NDAC 33.1-15-07-02.

3) The presence of a flame for EU E-1, FLR-1, EC-2 and EC-3 shall be monitored using a thermocouple or any other equivalent device approved by the Department.

Applicable Requirements: ACP-17910 v1.0, ACP-18195 v1.0 and NDAC 33.1-15-14-06.5.b(1)

F. **Like-Kind Engine Replacement**: This permit allows the permittee to replace the existing engines with a like-kind engine. Replacement is subject to the following conditions.

1) The Department must be notified within 10 days after change-out of the engine.

2) The replacement engine shall operate in the same manner, provide no increase in throughput and have equal or less emissions than the engine it is replacing.

3) The date of manufacture of the replacement engine must be included in the notification. The facility must comply with any applicable federal standards (e.g. NSPS, NESHAP, MACT) triggered by the replacement.

4) The replacement engine is subject to the same state emission limits as the existing engine in addition to any NSPS or MACT emission limit that is applicable. Testing of a nonemergency engine shall be conducted to confirm compliance with the emission limits within 180 days after start-up of the new engine.

Applicable Requirements: NDAC 33.1-15-14-06.5.b(1) and PTC15027

3. **Emission Unit Limits:**

Table 3.1 Emission Unit Limits

Emission Unit Description	EU	EP	Pollutant/ Parameter	Emission Limit [A]	NDAC Applicable Requirement
Caterpillar 3608LE natural gas-fired compression engines	ENG-1 through ENG-7	ENG-1 through ENG-7	NO_x	2.61 lb/hr (0.50 g/hp-hr) [B]	ACP-17910 v1.0 & ACP-18195 v1.0
			CO	1.00 lb/hr (0.19 g/hp-hr) [B]	ACP-17910 v1.0 & ACP-18195 v1.0
			VOC	1.31 lb/hr (0.251 g/hp-hr) [B]	ACP-17910 v1.0 & ACP-18195 v1.0
			Formaldehyde	0.104 lb/hr	ACP-18195 v1.0
			Opacity	20% [C]	ACP-17910 V1.0, ACP-18195 v1.0 & 33.1-15-03-02
			Operating Hours	52,860 hours/12-month rolling total [D]	ACP-18195 v1.0
Caterpillar 3616A4 natural gas-fired compression engines	ENG-8 through ENG-14	ENG-8 through ENG-14	NO_x	3.30 lb/hr (0.30 g/hp-hr) [B]	ACP-17910 v1.0 & ACP-18195 v1.0
			CO	2.20 lb/hr (0.20 g/hp-hr) [B]	ACP-17910 v1.0 & ACP-18195 v1.0
			VOC	2.75 lb/hr (0.25 g/hp-hr) [B]	ACP-17910 v1.0, ACP-18195 v1.0
			Formaldehyde	0.220 lb/hr	ACP-18195 v1.0
			Opacity	20% [C]	ACP-17910 v1.0, ACP-18195 v1.0 & 33.1-15-03-02
Tulsa heaters	HTR-1	HTR-1	NO_x	1.52 lb/hr	ACP-17910 v1.0 & ACP-18195 v1.0
			CO	1.89 lb/hr	ACP-17910 V1.0 & ACP-18195 v1.0
			Opacity	20% [C]	ACP-17910 v1.0, ACP-18195 v1.0 & 33.1-15-03-02

Emission Unit Description	EU	EP	Pollutant/ Parameter	Emission Limit [A]	NDAC Applicable Requirement
Hot oil heater	HTR-7	HTR-7	NO_x	3.46 lb/hr	ACP-18195 v1.0
			CO	3.55 lb/hr	ACP-18195 v1.0
			Opacity	20% [C]	ACP-18195 v1.0 & 33.1-15-03-02
Enclosed combustor	EC-3	EC-3	Opacity	20% [C]	ACP-18195 v1.0 & 33.1-15-03-02
Plant 1 flare	E-1	E-1	Opacity	20% [E]	ACP-17910 V1.0, ACP-18195 v1.0 & 33.1-15-03-03.1
Plant 2 flare	FLR-1	FLR-1	Opacity	20% [E]	ACP-17910 V1.0, ACP-18195 v1.0 & 33.1-15-03-03.1
Crude stabilization heaters	HTR-2a through HTR-2f, HTR-3a through HTR-3f & HTR-5a through HTR-5f	HTR-2a through HTR-2f, HTR-3a through HTR-3f & HTR-5a through HTR-5f	Opacity	20% [C]	ACP-17910 V1.0, ACP-18195 v1.0 & 33.1-15-03-02
Enclosed combustor	EC-2	EC-2	Opacity	20% [C]	ACP-18195 v1.0 & 33.1-15-03-02
Emergency generator	GEN-1	GEN-1	Opacity	20% [C]	ACP-18195 v1.0 & 33.1-15-03-02
			Operating Hours	Table 1.1 Footnote D	33-15-12-02, Subpart IIII & 40 CFR 63, Subpart ZZZZ
Fugitives	FUG-1 & FUG-2	FUG-1 & FUG-2	VOC	Condition 2.C.5	33.1-15-12-02, Subpart OOOOa

A The emission limits apply to each emission unit/emission point.

B The lb/hr (g/hp-hr) emission limits established by ACP-17910 v1.0 & ACP-18195 v1.0 are more stringent than the g/hp-hr and ppmvd (at 15% O_2) emission limits established by 40 CFR 60, Subpart JJJJ. Each engines must also comply with the emission limits established by 40 CFR 63, Subpart ZZZZ, as applicable.

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

D The compressor engines EU ENG-1 through ENG-7 are limited to operating no more than 52,860 total combined hours per year (12-month rolling total) for all seven engines.

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

4. **Monitoring Requirements and Conditions:**

A. **Requirements:**

Table 4.1 Emission Monitoring

Emission Unit Description	EU	Pollutant/ Parameter	Monitoring Requirement (Method) [A]	Condition Number	NDAC Applicable Requirement
Caterpillar natural gas-fired engines	ENG-1 through ENG-14	NO_x/CO/ VOC	Stack Tests & Recordkeeping	4.B.1 & 4.B.2	33.1-15-12-02, Subparts JJJJ & OOOOa & 40 CFR63, Subpart ZZZZ
		Formaldehyde	Stack Tests	4.B.3	33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a)
		ENG-1 through ENG-7 Operations	Recordkeeping	4.B.5	33.1-15-14-06.5.a(3)(a)
Tulsa heaters	HTR-1	NO_x/CO	Stack Test (Initial) & Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a) & 33.1-15-12-02, Subpart Dc
Hot oil heater	HTR-7	NO_x/CO	Stack Test (Initial) & Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a)
		Opacity	Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a) & 33.1-15-12-02, Subpart Dc
Enclosed combustor	EC-3	Opacity	Recordkeeping & VEO	4.B.6	33.1-15-14-06.5.a(3)(a)
Plant 1 flare	E-1	Opacity	Recordkeeping & VEO	4.B.6	33.1-15-14-06.5.a(3)(a)
Plant 2 flare	FLR-1	Opacity	Recordkeeping & VEO	4.B.6	33.1-15-14-06.5.a(3)(a)
Crude stabilization heaters	HTR-2a through HTR-2f, HTR-3a through HTR-3f & HTR-5a through HTR-5f	Opacity	Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a)
Enclosed combustor	EC-2	Opacity	Recordkeeping & VEO	4.B.6	33.1-15-14-06.5.a(3)(a)
Emergency generator	GEN-1	Opacity	Recordkeeping	4.B.4	33.1-15-14-06.5.a(3)(a)
		Operating Hours	Recordkeeping	4.B.7	33.1-15-12-02, Subpart IIII

Emission Unit Description	EU	Pollutant/ Parameter	Monitoring Requirement (Method) [A]	Condition Number	NDAC Applicable Requirement
Fugitives	FUG-1 & FUG-2	VOC	LDAR	4.B.8	33.1-15-12-02, Subpart OOOOa

[A] The monitoring requirement applies to each emission unit with associated emission point.

A. **Monitoring Conditions**:

1) For each engine, once every 8,760 hours of operation, three years, or when changes are made to an engine that may increase emission rates, whichever is more frequent, to provide a reasonable assurance of compliance, the permittee shall conduct an emissions test to measure NO_x, CO and VOC emissions, using EPA approved test methods in 40 CFR 60, Appendix A or at a minimum a portable analyzer method approved by the Department. A test shall consist of at least three runs, with each run at least 20 minutes in length.

Note: This requirement may be satisfied if recurring testing is otherwise performed in accordance with requirements under 40 CFR 60, Subpart JJJJ or 40 CFR 63, Subpart ZZZZ.

2) For each reciprocating compressor affected facility, monitoring of cumulative hours of operation or number of months since previous replacement of the rod packing and dates and times of each rod packing replacement shall be in accordance with the requirements of 40 CFR 60, Subpart OOOOa, §60.5385a, as applicable.

3) For each engine, once every 5-year permit period, or when changes are made to an engine that may increase emission rates, whichever is more frequent, to provide a reasonable assurance of compliance, the permittee shall conduct an emissions test to measure formaldehyde emissions, using EPA approved test methods.

4) For purposes of compliance monitoring, burning of fuels outlined in Condition 2.A, shall be considered credible evidence of compliance with any applicable NO_x, CO and opacity limit. However, results from tests conducted in accordance with the test methods in 40 CFR 50, 51, 60, 61, or 75 will take precedence over the burning of gaseous fuels as outlined in Condition 2.A, for evidence of compliance or noncompliance with any applicable NO_x, CO and opacity emission limit, in the event of enforcement action.

5) For EU ENG-1 though ENG-7, the permittee shall keep a record of the combined operating hours on a 12-month rolling total basis.

a) By the 15th day of each month, the permittee shall record the operating hours of EU ENG-1 though ENG-7 for the previous 12-month period. The permittee shall notify the Department within 10 working days if operating hours for the last 12-month period exceeds the operating hours limit. The operating records shall be kept on file (in an easily accessible format, electronic or otherwise) for five years and shall be submitted to the Department upon request.

6) Visible Emissions Observations: At least once per week in which the emergency and process flare (EU FL-8501/EP 11) is operated, a company representative who is certified or has received Department approved visible emissions training (requires a one-time visible emissions session, plus one hour visible emissions field training; need not be certified)) hall observe the emission point. If no visible emissions are observed, the date and time shall be recorded. If visible emissions are observed:

a) The permittee must investigate for a potential problem within eight hours. Any problems that are discovered must be corrected as soon as possible. If the correction of the emissions is expected to take longer than 24 hours, the permittee shall follow procedures as outlined in Condition 7.G.

1] Following corrective maintenance, a visible emissions observation shall be made by a trained company representative (need not be certified). If no visible emissions are observed, the date and time shall be recorded. If visible emissions are observed, a formal visible emissions evaluation shall be conducted in accordance with Condition 4.B.4)b.

b) If visible emissions are observed for longer than 24 hours, the permittee shall conduct a formal visible emissions evaluation of the flare to determine if the emissions are in compliance with the applicable opacity standard. Opacity reading shall consist of three consecutive six-minute periods per day of flaring using EPA Reference Method 9 and conducted by a certified visible emissions reader.

c) All investigations of malfunctions and visible emissions shall be recorded. The permittee shall comply with the visible emissions emission limit and nothing in this condition shall be construed as authorizing otherwise.

7) A log shall be kept of the total hours of operation on a calendar year basis. Records shall be maintained to differentiate between time operated for emergency purposes, maintenance/testing purposes, and other nonemergency purposes.

a) For certified engines, the permittee shall collect operational and maintenance data to demonstrate that the facility complies with the engine manufacturer's emission related written instructions [40 CFR 60.4211(a)].

8) For all equipment subject to the standard, the permittee shall comply with the inspection, monitoring and maintenance requirements of 40 CFR 60, Subpart OOOOa, §60.5397a and §60.5400a, as applicable.

5. **Recordkeeping Requirements**:

A. The permittee shall maintain compliance monitoring records as outlined in the Monitoring Records table that include the following information.

1) The date, place (as defined in the permit) and time of sampling or measurement.

2) The date(s) testing was performed.

3) The company, entity, or person that performed the testing.

4) The testing techniques or methods used.

5) The results of such testing.

6) The operating conditions that existed at the time of sampling or measurement.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(3)(b)[1]

Table 5.1 Monitoring Records

Emission Unit Description	EU	Pollutant/ Parameter	Compliance Monitoring Record
Caterpillar natural gas-fired engines	ENG-1 through ENG-14	NO_x/CO/ VOC	Stack Test Data & Rod Packing Monitoring Data for Each Engine
		Formaldehyde	Stack Test Data for Each Engine
		Opacity	Fuel Type Data for Each Engine
		EU ENG-1 through ENG-7 Operations	Operating Hours Data
Tulsa heaters	HTR-1	NO_x/CO	Initial Stack Test Data & Fuel Type Data
		Opacity	Fuel Type Data
Hot oil heater	HTR-7	NO_x/CO	Initial Stack Test Data & Fuel Type Data
		Opacity	Fuel Type Data
Enclosed combustor	EC-3	Opacity	Recordkeeping & VEO Data
Plant 1 flare	E-1	Opacity	Recordkeeping & VEO Data
Plant 2 flare	FLR-1	Opacity	Recordkeeping & VEO Data
Crude stabilization heaters	HTR-2a through HTR-2f, HTR-3a through HTR-3f & HTR-5a through HTR-5f	Opacity	Fuel Type Data
Enclosed combustor	EC-2	Opacity	Recordkeeping & VEO Data

Emission Unit Description	EU	Pollutant/ Parameter	Compliance Monitoring Record
Emergency generator	GEN-1	Opacity Operating Hours	Fuel Type Data Operating Hours Data
Fugitives	FUG-1 & FUG-2	VOC	LDAR Inspection, Monitoring & Maintenance Records

B. In addition to requirements outlined in Condition 5.A, recordkeeping shall be in accordance with the following requirements of NDAC 33.1-15-12 and 40 CFR 63, as applicable:

1) NDAC 33.1-15-12-02, Subpart A, §60.7, Notification and Recordkeeping

2) NDAC 33.1-15-12-02, Subpart Dc, §60.48c, Reporting and Recordkeeping Requirements

3) NDAC 33.1-15-12-02, Subpart JJJJ, §60.4245, Notification, Reports and Records for Owners and Operators

4) NDAC 33.1-15-12-02, Subpart OOOOa, §60.5420a and §60.5421a, Notification, Reporting, and Recordkeeping Requirements and Additional Recordkeeping Requirements

5) 40 CFR 63, Subpart A, §63.10, Recordkeeping and Reporting Requirements

6) 40 CFR 63, Subpart HH, §63.774, Recordkeeping Requirements

7) 40 CFR 63, Subpart ZZZZ, §63.6655 and §63.6660, Notification, Reports and Records

Applicable Requirements: NDAC 33.1-15-12, Subparts A, Dc, JJJJ and OOOOa and 40 CFR 63, Subparts A, HH and ZZZZ

C. 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 sampling, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings/computer printouts of continuous monitoring instrumentation, and copies of all reports required by the permit.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(3)(b)[2]

6. **Reporting**:

A. In addition to requirements outlined in Condition 5.A, recordkeeping shall be in accordance with the following requirements of NDAC 33.1-15-12 and 40 CFR 63, as applicable:

1) NDAC 33.1-15-12-02, Subpart A, §60.7, Notification and Recordkeeping

2) NDAC 33.1-15-12-02, Subpart Dc, §60.48c, Reporting and Recordkeeping Requirements

3) NDAC 33.1-15-12-02, Subpart JJJJ, §60.4245, Notification, Reports and Records for Owners and Operators

4) NDAC 33.1-15-12-02, Subpart OOOOa, §60.5420a and §60.5422a, Notification, Reporting, and Recordkeeping Requirements and Additional Reporting Requirements

5) 40 CFR 63, Subpart A, §63.10, Recordkeeping and Reporting Requirements

6) 40 CFR 63, Subpart HH, §63.775, Reporting Requirements

7) 40 CFR 63, Subpart ZZZZ, §63.6655 and §63.6660, Notification, Reports and Records

Applicable Requirements: NDAC 33.1-15-12, Subparts A, Dc, JJJJ and OOOOa and 40 CFR 63, Subparts A, HH and ZZZZ

B. The permittee shall submit a semi-annual monitoring report for all monitoring records required under Condition 5 in a format provided or approved by the Department. All instances of deviations from the permit must be identified in the report. A monitoring report shall be submitted within 45 days after June 30 and December 31 of each year.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(3)(c)[1] and [2]

C. The permittee shall submit an annual compliance certification report in accordance with NDAC 33.1-15-14-06.5.c(5) within 45 days after December 31 of each year in a format provided or approved by the Department.

Applicable Requirement: NDAC 33.1-15-14-06.5.c(5)

D. For emission units where the method of compliance monitoring is demonstrated by an EPA Test Method or a portable analyzer test, the test report shall be submitted to the Department within 60 days after completion of the test.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(e)

E. The permittee shall submit an annual emission inventory report (AEIR) in a format provided or approved by the Department. This report shall be submitted by March 15 of each year. Insignificant units/activities listed in this permit do not need to be included in the report.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(7) and NDAC 33.1-15-23-04

7. **Facility Wide Operating Conditions**:

A. **Ambient Air Quality Standards**:

1) Particulate and gases. The permittee shall not emit air contaminants in such a manner or amount that would violate the standards of ambient air quality listed in Table 1 of NDAC 33.1-15-02, external to buildings, to which the general public has access.

2) Radioactive substances. The permittee shall not release into the ambient air any radioactive substances exceeding the concentrations specified in NDAC 33.1-10.

3) Other air contaminants. The permittee shall not emit any other air contaminants in concentrations that would be injurious to human health or well-being or unreasonably interfere with the enjoyment of property or that would injure plant or animal life.

4) Disclaimer. Nothing in any other part or section of this permit may in any manner be construed as authorizing or legalizing the emission of air contaminants in such manner that would violate the standards in Paragraphs 1), 2) and 3) of this condition.

Applicable Requirements: NDAC 33.1-15-02-04 and 40 CFR 50.1(e)

B. **Fugitive Emissions**: The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.

Applicable Requirement: NDAC 33.1-15-17

C. **Open Burning**: The permittee may not cause, conduct, or permit open burning of refuse, trade waste, or other combustible material, except as provided for in Section 33.1-15-04-02 and may not conduct, cause, or permit the conduct of a salvage operation by open burning. Any permissible open burning under NDAC 33.1-15-04-02 must comply with the requirements of that section.

Applicable Requirement: NDAC 33.1-15-04

D. **Asbestos Renovation or Demolition**: Any asbestos renovation or demolition at the facility shall comply with emission standard for asbestos in NDAC 33.1-15-13.

Applicable Requirement: NDAC 33.1-15-13-02

E. **Requirements for Organic Compounds Gas Disposal**:

1) Any organic compounds, gases and vapors which are generated as wastes as the result of storage, refining or processing operations and which contain hydrogen sulfide shall be incinerated, flared or treated in an equally effective manner before being released into the ambient air.

2) Each flare must be equipped and operated with an automatic ignitor or a continuous burning pilot.

Applicable Requirement: NDAC 33.1-15-07-02

F. **Rotating Pumps and Compressors**: All rotating pumps and compressors handling volatile organic compounds must be equipped and operated with properly maintained seals designed for their specific product service and operating conditions.

Applicable Requirement: NDAC 33.1-15-07-01.5

G. **Shutdowns/Malfunction/Continuous Emission Monitoring System Failure**:

1) Maintenance Shutdowns. In the case of shutdown of air pollution control equipment for necessary scheduled maintenance, the intent to shut down such equipment shall be reported to the Department at least 24 hours prior to the planned shutdown provided that the air contaminating source will be operated while the control equipment is not in service. Such prior notice shall include the following:

a) Identification of the specific facility to be taken out of service as well as its location and permit number.

b) The expected length of time that the air pollution control equipment will be out of service.

c) The nature and estimated quantity of emissions of air pollutants likely to be emitted during the shutdown period.

d) Measures, such as the use of off-shift labor and equipment, that will be taken to minimize the length of the shutdown period.

e) The reasons that it would be impossible or impractical to shut down the source operation during the maintenance period.

f) Nothing in this subsection shall in any manner be construed as authorizing or legalizing the emission of air contaminants in excess of the rate allowed by this article or a permit issued pursuant to this article.

Applicable Requirement: NDAC 33.1-15-01-13.1

2) Malfunctions.

a) When a malfunction in any installation occurs that can be expected to last longer than 24 hours and cause the emission of air contaminants in violation of this article or other applicable rules and regulations, the person responsible for such installation shall notify the Department of such malfunction as soon as possible

during normal working hours. The notification must contain a statement giving all pertinent facts, including the estimated duration of the breakdown. The Department shall be notified when the condition causing the malfunction has been corrected.

b) Immediate notification to the Department is required for any malfunction that would threaten health or welfare or pose an imminent danger. During normal working hours the Department can be contacted at 701-328-5188. After hours the Department can be contacted through the 24-hour state radio emergency number 1-800-472-2121. If calling from out of state, the 24-hour number is 701-328-9921.

c) Unavoidable Malfunction. The owner or operator of a source who believes any excess emissions resulted from an unavoidable malfunction shall submit a written report to the Department which includes evidence that:

[1] The excess emissions were caused by a sudden, unavoidable breakdown of technology that was beyond the reasonable control of the owner or operator.

[2] The excess emissions could not have been avoided by better operation and maintenance, did not stem from an activity or event that could have been foreseen and avoided, or planned for.

[3] To the extent practicable, the source maintained and operated the air pollution control equipment and process equipment in a manner consistent with good practice for minimizing emissions, including minimizing any bypass emissions.

[4] Any necessary repairs were made as quickly as practicable, using off-shift labor and overtime as needed and possible.

[5] All practicable steps were taken to minimize the potential impact of the excess emissions on ambient air quality.

[6] The excess emissions are not part of a recurring pattern that may have been caused by inadequate operation or maintenance, or inadequate design of the malfunctioning equipment.

The report shall be submitted within 30 days of the end of the calendar quarter in which the malfunction occurred or within 30 days of a written request by the Department, whichever is sooner.

The burden of proof is on the owner or operator of the source to provide sufficient information to demonstrate that an unavoidable equipment malfunction occurred. The Department may elect not to pursue enforcement action after considering whether excess emissions resulted from an unavoidable equipment malfunction. The Department will evaluate, on a case-by-case basis, the information submitted by the owner or operator to determine whether to pursue enforcement action.

Applicable Requirement: NDAC 33.1-15-01-13.2

3) Continuous Emission Monitoring System Failures. When a failure of a continuous emission monitoring system occurs, an alternative method for measuring or estimating emissions must be undertaken as soon as possible. The owner or operator of a source that uses an alternative method shall have the burden of demonstrating that the method is accurate. Timely repair of the emission monitoring system must be made. The provisions of this subsection do not apply to sources that are subject to monitoring requirements in Chapter 33.1-15-21 (40 CFR 75, Acid Rain Program).

Applicable Requirement: NDAC 33.1-15-01-13.3

H. **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.

Applicable Requirement: NDAC 33.1-15-08-01

I. **Prohibition of Air Pollution**:

1) The permittee shall not permit or cause air pollution, as defined in NDAC 33.1-15-01-04.

2) Nothing in any other part of this permit or any other regulation relating to air pollution shall in any manner be construed as authorizing or legalizing the creation or maintenance of air pollution.

Applicable Requirement: NDAC 33.1-15-01-15

J. **Performance Tests**:

1) The Department may reasonably require the permittee to make or have made tests, at a reasonable time or interval, to determine the emission of air contaminants from any source, for the purpose of determining whether the permittee is in violation of any standard or to satisfy other requirements of NDCC 23.1-06. All tests shall be made, and the results calculated in accordance with test procedures approved or specified by the Department including the North Dakota Department of Environmental Quality Emission Testing Guideline. All tests shall be conducted by reputable, qualified personnel. The Department shall be given a copy of the test results in writing and signed by the person responsible for the tests.

2) The Department may conduct tests of emissions of air contaminants from any source. Upon request of the Department, the permittee shall provide necessary and adequate access into stacks or ducts and such other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices, as may be necessary for proper determination of the emission of air contaminants.

Applicable Requirement: NDAC 33.1-15-01-12

3) Except for sources subject to 40 CFR 63, the permittee shall notify the Department by submitting a Proposed Test Plan, or its equivalent, at least 30 calendar days in advance of any tests of emissions of air contaminants required by the Department. The permittee shall notify the Department at least 60 calendar days in advance of any performance testing required under 40 CFR 63, unless otherwise specified by the subpart. If the permittee is unable to conduct the performance test on the scheduled date, the permittee shall notify the Department as soon as practicable when conditions warrant and shall coordinate a new test date with the Department.

Failure to give the proper notification may prevent the Department from observing the test. If the Department is unable to observe the test because of improper notification, the test results may be rejected.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(3)(a), NDAC 33.1-15-12-02 Subpart A (40 CFR 60.8), NDAC 33.1-15-13-01.2 Subpart A (40 CFR 61.13), NDAC 33.1-15-22-03 Subpart A (40 CFR 63.7)

K. **Pesticide Use and Disposal**: Any use of a pesticide or disposal of surplus pesticides and empty pesticide containers shall comply with the requirements in NDAC 33.1-15-10.

Applicable Requirements: NDAC 33.1-15-10-01 and NDAC 33.1-15-10-02

L. **Air Pollution Emergency Episodes**: When an air pollution emergency episode is declared by the Department, the permittee shall comply with the requirements in NDAC 33.1-15-11.

Applicable Requirements: NDAC 33.1-15-11-01 through NDAC 33.1-15-11-04

M. **Stratospheric Ozone Protection**: The permittee shall comply with any applicable standards for recycling and emissions reduction pursuant to 40 CFR 82, Subpart F, except as provided for MVACs in Subpart B:

1) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to Section 82.156.

2) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to Section 82.158.

3) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to Section 82.161.

4) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to Section 82.156.

Applicable Requirement: 40 CFR 82

N. **Chemical Accident Prevention**: The permittee shall comply with all applicable requirements of Chemical Accident Prevention pursuant to 40 CFR 68. The permittee shall comply with the requirements of this part no later than the latest of the following dates:

1) Three years after the date on which a regulated substance is first listed under this part; or

2) The date on which a regulated substance is first present above a threshold quantity in a process.

Applicable Requirement: 40 CFR 68

O. **Air Pollution Control Equipment**: The permittee shall maintain and operate air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. The manufacturer's recommended Operations and Maintenance (O&M) procedures, or a site-specific O&M procedure developed from the manufacturer's recommended O&M procedures, shall be followed to assure proper operation and maintenance of the equipment. The permittee shall have the O&M procedures available onsite and provide the Department with a copy when requested.

Applicable Requirement: NDAC 33.1-15-14-06.5.b(1)

P. **Prevention of Significant Deterioration of Air Quality** (40 CFR 52.21 as incorporated by NDAC Chapter 33.1-15-15): If this facility is classified as a major stationary source under the Prevention of Significant Deterioration of Air Quality (PSD) rules, a Permit to Construct must be obtained from the Department for any project which meets the definition of a "major modification" under 40 CFR 52.21(b)(2).

If this facility is classified as a major stationary source under the PSD rules and the permittee elects to use the method specified in 40 CFR 52.21(b)(41)(ii)(a) through (c) for calculating the projected actual emissions of a proposed project, then the permittee shall comply with all applicable requirements of 40 CFR 52.21(r)(6).

Applicable Requirement: NDAC 33.1-15-15-01.2

8. **General Conditions**:

A. **Annual Fee Payment**: The permittee shall pay an annual fee, for administering and monitoring compliance, which is determined by the actual annual emissions of regulated contaminants from the previous calendar year. The Department will send a notice, identifying the amount of the annual permit fee, to the permittee of each affected installation. The fee is due within 60 days following the date of such notice. Any source that qualifies as a "small business" may petition the Department to reduce or exempt any fee required under this section. Failure to pay the fee in a timely manner or submit a certification for exemption may cause this Department to initiate action to revoke the permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(7) and NDAC 33.1-15-23-04

B. **Permit Renewal and Expiration**: This permit shall be effective from the date of its issuance for a fixed period of five years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least six months, but no more than 18 months, prior to the date of permit expiration. The Department shall approve or disapprove the renewal application within 60 days of receipt. Unless the Department requests additional information or otherwise notifies the applicant of incompleteness, the application shall be deemed complete. For timely and complete renewal applications for which the Department has failed to issue or deny the renewal permit before the expiration date of the previous permit, all terms and conditions of the permit, including any permit shield previously granted shall remain in effect until the renewal permit has been issued or denied. The application for renewal shall include the current permit number, description of any permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term.

Applicable Requirements: NDAC 33.1-15-14-06.4 and NDAC 33.1-15-14-06.6

C. **Transfer of Ownership or Operation**: This permit may not be transferred except by procedures allowed in Chapter 33.1-15-14 and is to be returned to the Department upon the destruction or change of ownership of the source unit(s), or upon expiration, suspension or revocation of this permit. A change in ownership or operational control of a source is treated as an administrative permit amendment if no other change in the permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Department.

Applicable Requirement: NDAC 33.1-15-14-06.6.d

D. **Property Rights**: This permit does not convey any property rights of any sort, or any exclusive privilege.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(d)

E. **Submissions**:

1) Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to the Department using a format provided or approved by the Department. Physical submittals shall be submitted to:

North Dakota Department of Environmental Quality
Division of Air Quality
4201 Normandy Street, 2nd Floor
Bismarck, ND 58503-1324

2) Any application form, report or compliance certification submitted shall be certified as being true, accurate, and complete by a responsible official.

Applicable Requirement: NDAC 33.1-15-14-06.4.d

F. **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 listed on this permit or where records are kept concerning this permit at any reasonable time for the purpose of ascertaining the state of compliance with this permit and 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.

Applicable Requirements: NDAC 33.1-15-14-06.5.c(2) and NDAC 33.1-15-01-06

G. **Compliance**: The permittee must comply with all conditions of this permit. Any noncompliance with a federally-enforceable permit condition constitutes a violation of the Federal Clean Air Act. Any noncompliance with any State enforceable condition of this permit constitutes a violation of NDCC Chapter 23.1-06 and NDAC 33.1-15. Violation of any condition of this permit is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Noncompliance may also be grounds for assessment of penalties under the NDCC 23.1-06. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(6)(a) and NDAC 33.1-15-14-06.5.a(6)(b)

H. **Duty to Provide Information**: The permittee shall furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. This includes instances where an alteration, repair, expansion, or change in method of operation of the source occurs. Upon request, the permittee shall also furnish to the Department copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such recourse directly to the

Department along with a claim of confidentiality. The permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information. Items that warrant supplemental information submittal include, but are not limited to, changes in the ambient air boundary and changes in parameters associated with emission points (i.e., stack parameters). The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit.

Applicable Requirements: NDAC 33.1-15-14-06.5.a(6)(e), NDAC 33.1-15-14-06.6.b(3) and NDAC 33.1-15-14-06.4.b

I. **Reopening for Cause**: The Department will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1) Additional applicable requirements under the Federal Clean Air Act become applicable to the permittee with a remaining permit term of three or more years. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit.

2) The Department or the United States Environmental Protection Agency determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.

3) The Department or the United States Environmental Protection Agency determines that the permit must be revised or revoked to assure compliance with the applicable requirements.

4) Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by the Department at least 30 days in advance of the date that this permit is to be reopened, except that the Department may provide a shorter time period in the case of an emergency. Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable.

Applicable Requirement: NDAC 33.1-15-14-06.6.f

J. **Permit Changes**: The permit may be modified, revoked, reopened, and reissued or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(6)(c)

K. **Off-Permit Changes**: A permit revision is not required for changes that are not addressed or prohibited by this permit, provided the following conditions are met:

1) No such change may violate any term or condition of this permit.

2) Each change must comply with all applicable requirements.

3) Changes under this provision may not include changes or activities subject to any requirement under Title IV or that are modifications under any provision of Title I of the Federal Clean Air Act.

4) A Permit to Construct under NDAC 33.1-15-14-02 has been issued, if required.

5) Before the permit change is made, the permittee must provide written notice to both the Department and Air Program (8P-AR), Office of Partnerships & Regulatory Assistance, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129, except for changes that qualify as insignificant activities in Section 33.1-15-14-06. This notice shall describe each change, the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result.

6) The permittee shall record all changes that result in emissions of any regulated air pollutant subject to any applicable requirement not otherwise regulated under this permit, and the emissions resulting from those changes. The record shall reside at the permittee's facility.

Applicable Requirement: NDAC 33.1-15-14-06.6.b(3)

L. **Administrative Permit Amendments:** This permit may be revised through an administrative permit amendment, if the revision to this permit accomplishes one of the following:

1) Corrects typographical errors.

2) Identifies a change in the name, address or phone number of any person identified in this permit or provides a similar minor administrative change at the source.

3) Requires more frequent monitoring or reporting by the permittee.

4) Allows for a change in ownership or operational control of the source where the Department determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittee has been submitted to the Department.

5) Incorporates into the Title V permit the requirements from a Permit to Construct when the review was substantially equivalent to Title V requirements for permit issuance, renewal, reopenings, revisions and permit review by the United States Environmental Protection Agency and affected state review, that would be applicable to the change if it were subject to review as a permit modification and compliance requirements substantially equivalent to Title V requirements for permit content were contained in the Permit to Construct.

6) Incorporates any other type of change which the Administrator of the United States Environmental Protection Agency has approved as being an administrative permit amendment as part of the Department's approved Title V operating permit program.

Applicable Requirement: NDAC 33.1-15-14-06.6.d

M. **Minor Permit Modifications**: This permit may be revised by a minor permit modification, if the proposed permit modification meets the following requirements:

1) Does not violate any applicable requirement.

2) Does not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in this permit.

3) Does not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis.

4) Does not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include a federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the Federal Clean Air Act; and alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the Federal Clean Air Act.

5) Is not a modification under NDAC 33.1-15-12, 33.1-15-13, and 33.1-15-15 or any provision of Title I of the Federal Clean Air Act.

6) Is not required to be processed as a significant modification.

Applicable Requirement: NDAC 33.1-15-14-06.6.e(1)

N. **Significant Modifications**:

1) Significant modification procedures shall be used for applications requesting permit modifications that do not qualify as minor permit modifications or as administrative amendments. Every significant change in existing monitoring permit terms or conditions and every relaxation of reporting or recordkeeping permit terms or conditions shall be considered significant. Nothing therein shall be construed to preclude the permittee from making changes consistent with this subsection that would render existing permit compliance terms and conditions irrelevant.

2) Significant permit modifications shall meet all Title V requirements, including those for applications, public participation, review by affected states, and review by the United States Environmental Protection Agency, as they apply to permit issuance and permit

renewal. The Department shall complete review of significant permit modifications within nine months after receipt of a complete application.

Applicable Requirement: NDAC 33.1-15-14-06.6.e(3)

O. **Operational Flexibility**: The permittee is allowed to make a limited class of changes within the permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit, are not Title I modifications and a Permit to Construct is not required. This class of changes does not include changes that would violate applicable requirements, or changes to federally-enforceable permit terms or conditions that are monitoring, recordkeeping, reporting, or compliance certification requirements.

The permittee is required to send a notice to both the Department and Air Program (8P-AR), Office of Partnerships & Regulatory Assistance, US EPA Region 8, 1595 Wynkoop Street, Denver, CO 80202-1129, at least seven days in advance of any change made under this provision. The notice must describe the change, when it will occur and any change in emissions, and identify any permit terms or conditions made inapplicable as a result of the change. The permittee shall attach each notice to its copy of this permit. Any permit shield provided in this permit does not apply to changes made under this provision.

Applicable Requirement: NDAC 33.1-15-14-06.6.b(2)

P. **Relationship to Other Requirements**: Nothing in this permit shall alter or affect the following:

1) The provisions of Section 303 of the Federal Clean Air Act (emergency orders), including the authority of the administrator of the United States Environmental Protection Agency under that section.

2) The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.

3) The ability of the United States Environmental Protection Agency to obtain information from a source pursuant to Section 114 of the Federal Clean Air Act.

4) Nothing in this permit shall relieve the permittee of the requirement to obtain a Permit to Construct.

Applicable Requirements: NDAC 33.1-15-14-06.3 and NDAC 33.1-15-14-06.5.f(3)(a), (b) and (d)

Q. **Severability Clause**: The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the

application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

Applicable Requirement: NDAC 33.1-15-14-06.5.a(5)

R. **Circumvention**: The permittee shall not cause or permit the installation or use of any device of any means which conceals or dilutes an emission of air contaminants which would otherwise violate this permit.

Applicable Requirement: NDAC 33.1-15-01-08

9. **State Enforceable Only Conditions (not Federally enforceable)**:

A. **General Odor Restriction**: The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which exceeds the limits established in NDAC 33.1-15-16.

Applicable Requirement: NDAC 33.1-15-16

B. **Hydrogen Sulfide Restriction**: The permittee shall not discharge into the ambient air hydrogen sulfide (H_2S) in concentrations that would be objectionable on land owned or leased by the complainant or in areas normally accessed by the general public. For the purpose of complaint resolution, two samples with concentrations greater than 0.05 parts per million (50 parts per billion) sampled at least 15 minutes apart within a two-hour period and measured in accordance with Section 33.1-15-16-04 constitute a violation.

Applicable Requirement: NDAC 33.1-15-16-04

Rough Rider Operating, LLC, a subsidiary of Energy Transfer, LP
Wild Basin Gas Processing and Crude Handling Facility
Title V Permit to Operate No. AOP-28573 v1.0
Initial Issuance
Statement of Basis
(July 19, 2024)

Facility Background: The Rough Rider Operating, LLC (Rough Rider), a subsidiary of Energy Transfer, LP (Energy), Wild Basin Gas Processing and Crude Handling Facility (Wild Basin) gathers and processes field gas and crude oil production from the Wild Basin area of the Bakken Shale Formation. The facility has a design capacity of approximately 280 MMscf of gas per day. The plant is located northeast of Watford City, ND in McKenzie County.

Wild Basin consists of the Crude Handling Plant on the south side, Gas Plant 1 in the middle, and Gas Plant 2 on the north side of the site. Wild Basin removes natural gas liquids (NGLs) and compresses treated gas to pipeline pressure for transfer to pipeline for sale. Field gas enters the facility via pipeline from the Wild Basin area and is transported offsite by an NGL pipeline. Crude oil enters the plant via pipeline or truck (LACT skids). The LACT crude oil is transferred to unloading tanks and then to storage tanks prior to being metered and leaving the site via oil pipeline. The entering pipeline crude is ultimately sent to storage tanks prior to being metered and leaving the site via oil pipeline. The predominant sources of air emissions are the compressor engines, process heaters, two flares, enclosed combustor and crude stabilization facility with an additional enclosed combustor.

Chronology of significant events (not all-inclusive):

June 15, 2015 - Air Quality Permit to Construct (PTC)15027 (ACP-17722 v1.0) was issued to permit the construction and initial operation of Wild Basin. This PTC was rescinded in 2018 with the issuance of ACP-17844 v1.0 (described subsequently).

September 15, 2016 - Wild Basin began initial operations.

February 12, 2016 - PTC16004 (ACP-17777 v1.0) was issued for an additional tank (CT-3), truck rack unloading (TR-1) and a vapor recovery unit (VRU-1). This PTC was rescinded in 2018 with the issuance of ACP-17844 v1.0 (described subsequently).

January 23, 2018 - PTC17032 (ACP-17844 v1.0) was issued for the addition of several engines, changes to the crude stabilization facility and permit clean up (rescinding ACP-17722 v1.0 and ACP-17777 v1.0). This PTC was rescinded with the issuance of ACP-17910 v1.0 in 2019 and ACP-18195 v1.0 in 2023 (both described subsequently).

November 16, 2018 - A timely, initial Title V permit application was received for Wild Basin, along with an application for PTC19006 (ACP-17910 v1.0).

July 15, 2019 - ACP-17910 v1.0 was issued for modifying the fuel gas-fired crude stabilization heaters and allowed for the construction and initial operation of eight more engines (EU M ENG-1 through M ENG-8), the TEG dehydration unit, natural gas-fired TEG reboiler, two small natural gas-fired heaters, four natural gas liquids loadouts, four methanol tanks, a slop tank and various lube oil tanks. ACP-17844 v1.0 was rescinded with the issuance of this PTC. EU M ENG-1 through M ENG-8, HTR-8. M DEHY-1, M RBLR-1, M HTR-1, M HTR-2, M NGL-1 to 4, MMT-1 to 4, M ST-1 and M LT were not constructed nor are there plans for future construction. In addition, EU CT-4 (180,000 bbl crude storage tank) was not constructed nor are there plans for future construction. Thus, the crude stabilization facility is no longer considered a nested PSD source. All of the engines on site were permitted with lb/hr emission limits below 40 CFR 60, Subpart JJJJ listed limits for NO_x, CO and VOC, which limited the combined facility-wide PTE to below PSD-significant levels (synthetic minor for PSD).

December 3, 2019 – PTC19043 (ACP-17945 v1.0) was issued for the MRU enclosed combustor.

July 15, 2020 - A timely, updated initial Title V permit application was received for Wild Basin.

August 16, 2022 – A Voluntary Self-Disclosure of Environmental Self-Evaluation was submitted by Crestwood Equity Partners LP. The evaluation highlighted changes that needed to be addressed by a construction permit, which would be incorporated into the Title V.

April 19, 2023 – A Voluntary Self-Disclosure of Environmental Self-Evaluation was submitted by Rough Rider Operating. The evaluation highlighted changes that needed to be addressed by a construction permit, which would be incorporated into the Title V.

August 24, 2023 – ACP-18195 v.1.0 was issued for changes at the facility associated with the August 16, 2022 and April 2023 internal audit (updated PTE calculations resulting in a decrease in PTE estimates, new emergency generator, formaldehyde limit on the compressor engines, update to the compressor engines' hours per year of operation restriction). All of the engines on site were permitted with lb/hr emission limits below 40 CFR 60, Subpart JJJJ listed limits for NO_x, CO and VOC, which limited the combined facility-wide PTE to below PSD-significant levels (remained a synthetic minor for PSD).

March 2022 through December 2023 – Notification of several owner/permittee name changes (Oasis Midstream Services; Falcon Operating, LLC; Crestwood Equity Partners LP; Roughrider Operating, LLC; Energy Transfer LP)

Current Action: On March 22, 2024 the Department received a timely, updated application for an initial Title V through CERIS-ND from Energy Transfer LP for the Wild Basin Gas Processing and Crude Handling Facility Title V Permit to Operate No. AOP-28573. The draft, initial permit incorporates all of the active construction permits, ACP-17910 v1.0, ACP-17945 v1.0 and ACP-18195 v.1.0, along with monitoring, recordkeeping and reporting for the significant emission units and applicable regulations.

The Department proposes to issue the initial Title V Permit to Operate No. AOP-28573 v1.0 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 potential annual NO_x, CO and VOC emissions exceed the 100 tons per year (tpy) major source threshold. The plant is a minor/area source of Hazardous Air Pollutant (HAP) emissions because individual (formaldehyde) and combined potential annual HAP emissions are below 10 tpy and 25 tpy, respectively. Formaldehyde emission limits for the compressor engines in the draft permit maintain the individual HAP emissions below 10 tpy. 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 Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (EU HTR-1 and HTR-7). Gaseous fuel-fired units such as these require fuel tracking.

   Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction or Modification Commenced after July 23, 1984 (EU CT-1 through CT-3 and STC-1 through STC-6).

   Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (EU GEN-1).

   Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines (EU ENG-1 through ENG-14).

   Subpart OOOOa - Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification, or Reconstruction Commenced after September 18, 2015 (reciprocating compressors for EU ENG-1 through ENG-14, FUG-1 and FUG-2).

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) 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 subparts apply to the facility, which is an area source of HAP

emissions. Formaldehyde emission limits for the compressor engines in the draft permit maintain the individual HAP emissions below 10 tpy.

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

Subpart HH, National Emissions Standards for Hazardous Air Pollutants from Oil and Natural Gas Production Facilities (EU DEHY-1). EU DEHY-1 is exempt from the general standard requirements according to 40 CFR §63.764(e)(1)(ii), since its actual average benzene emissions are less than 0.90 megagrams per year (including federally enforceable controls). 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 ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, applies to the engines (EU ENG-1 through ENG-14 and GEN-1). As an area source of HAP emissions, compliance with this subpart is achieved through compliance with 40 CFR 60, Subparts IIII and 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.

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

6. **Prevention of Significant Deterioration (PSD).** Petroleum storage & transfer of more than 300,000 bbl is one of the 28 source categories under PSD, however, since EU CT-4 was not constructed, petroleum storage and transfer is less than 300,000 bbl (actual ~214,405 bbl) and the crude stabilization facility is not considered a nested PSD source. Additionally, all of the engines are permitted with lb/hr emission limits below the 40 CFR 60, Subpart JJJJ listed limits for NO_x, CO and VOC, which limit the combined facility-wide PTE to below PSD-significant levels (synthetic minor for 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 and there are no PSD-significant changes contained in the draft permit. Therefore, this permit is not subject to a PSD review.

7. **BACT.** Since the facility is not a major PSD source and there are no PSD-significant changes contained in the draft permit, a BACT review is not required for the draft permit.

8. **Gap Filling.** This permit contains gap filling for testing, monitoring or recordkeeping not otherwise required by rule. 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 lb sulfur per million Btu) was streamlined because the standard ND natural gas fuel restriction for sulfur (2 grains/100 scf) is more stringent. The 40 CFR 60, Subpart JJJJ NO_x, CO and VOC emission limits

for the compressor engines (EU ENG-1 through ENG-14) were streamlined because the lb/hr (ppm) limit in the construction permits and incorporated into the draft operating permit are more stringent than the applicable subpart.

10. **Compliance Assurance Monitoring (CAM).** CAM does not apply because adequate monitoring is specified in post-11/15/90 NSPS (Subpart JJJJ) and NESHAP/MACT (Subpart ZZZZ) regulations.

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

12. **New Conditions/Limits.** This draft permit is the initial Title V operating permit for the facility and incorporates construction permits ACP-17910 v1.0, ACP-17945 v1.0 and ACP-18195 v.1.0.

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.

Comments/Recommendations: It is recommended that the initial Title V Permit to Operate No. AOP-28573 v1.0 be processed and considered for issuance following a 30-day public comment period and a subsequent 45-day EPA review period.

Table 1: Facility Potential to Emit - Total Tons Per Year

Pollutant	**Without Fugitive**	**With Fugitive**
PM	23.1	23.1
PM_{10}	23.1	23.1
$PM_{2.5}$	23.1	23.1
NO_x	207.7	207.7
SO_2	1.5	1.5
CO	161.4	161.4
VOC	169.7	219.5
Total HAP	16.9	18.4
Individual HAP (formaldehyde)	9.6	9.6