

MEMO TO : File  
Archer Daniels Midland Company (ADM)  
Enderlin Facility  
Ransom County, North Dakota

FROM : Brittany Hansey  
Environmental Scientist  
*Division of Air Quality*  
North Dakota Department of Environmental Quality (Department)

RE : Permit to Construct (PTC) (ACP-18337 v1.0)

DATE : May 15, 2026

ADM submitted a Title V Permit to Operate renewal application for the Enderlin Facility (facility) to the Department on September 10, 2025. The facility currently operates under Air Permit to Operate No. AOP-28378 v5.0, which expires on May 15, 2026.

ADM requested in the application to remove particulate matter (PM) emission limits from various permits to construct, update the emission limits for the JTA Boiler (EU 17) according to 40 CFR Part 63, Subpart DDDDD, update the number of cyclones associated with the Meal/Hull Processing unit (EU 11), and remove the Bean Dryer (EU 71).

In addition to the requested revisions, the Department conducted a review of the facility's issued permits to construct and determined the following items were also appropriate to address: removal of additional PM emission limits from various permits to construct, removal of the oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) emission limits for the emergency diesel generator engines (EUs 33 and 69), and incorporation of the solvent loss ratio requirement from Consent Decree 03-CV-2066 with this permit action. Operating restrictions for the JTA Boiler, Newpoint NUK Boiler, and Trane Murray Boiler (ACP-18337 v1.0, Conditions 2.B and 2.C) were included with this permit action to provide a reference in Table 3-1 of ACP-18337 v1.0, Condition 3. No changes were made to the operating restrictions; however, the language was restructured for improved readability.

Prior to issuing the Title V Permit to Operate renewal, a permit to construct must first be issued to incorporate these revisions into the Title V Permit to Operate. Upon issuance of this permit to construct, the facility will remain a Title V source. This permit action does not affect Prevention of Significant Deterioration (PSD) applicability, and a Best Available Control Technology (BACT) analysis is not required. Facility Potential to Emit (PTE) is summarized in Table 1.



Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	NO <sub>x</sub>	CO	SO <sub>2</sub>	VOC	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Total HAP	Hydrogen chloride (Largest HAP)
JTA boiler	17	17	215.85	104.99	334.00	47.73	19.58	166.44	166.44	48.02	24.53
Newpoint NUK boiler	62	62	6.44	5.41	0.04	0.35	0.49	0.49	0.49	0.12	-
Trane Murray boiler	64	64	81.16	68.17	0.49	4.46	6.17	6.17	6.17	1.53	-
Caterpillar diesel engine driven emergency generator	69	69	2.18	0.50	0.00	0.06	0.06	0.06	0.06	0.00	-
Starch flash dryer	PI-09	PI-09	12.88	10.82	0.08	0.71	0.98	0.98	0.98	0.24	-
Isolate spray dryer system	PI-16	PI-16a	13.74	11.54	0.08	0.76	1.04	1.04	1.04	0.26	-
		PI-16b									
Insignificant Activities and Fugitives Total	IA	IA	1.35	0.29	0.09	1.33	49.81	33.03	22.51	0.00	-
<b>Total (without Fugitives and IA):</b>			<b>334.4</b>	<b>219.0</b>	<b>369.8</b>	<b>735.5</b>	<b>50.8</b>	<b>194.8</b>	<b>191.5</b>	<b>50.9</b>	<b>24.5</b>
<b>Total (with Fugitives and IA):</b>			<b>335.8</b>	<b>219.3</b>	<b>369.9</b>	<b>736.8</b>	<b>100.6</b>	<b>227.9</b>	<b>214.0</b>	<b>50.9</b>	<b>24.5</b>

<sup>A</sup> Abbreviations:

NO<sub>x</sub>: oxides of nitrogen

CO: carbon monoxide

SO<sub>2</sub>: sulfur dioxide

VOC: volatile organic compounds

PM: total filterable and condensable particulate matter

PM<sub>2.5</sub>: PM with an aerodynamic diameter less than or equal to 2.5 microns ( $\leq 2.5 \mu\text{m}$ )

PM<sub>10</sub>: PM with an aerodynamic diameter less than or equal to 10 microns ( $\leq 10 \mu\text{m}$ ) including PM<sub>2.5</sub>

HAP: hazardous air pollutants as defined in Section 112(b) of the Clean Air Act

After a complete review of the proposed revisions indicating that the facility is expected to comply with applicable federal and state air pollution rules and regulations, the Department will make a recommendation on PTC issuance for Enderlin Facility following the completion of a thirty-day public comment period. The public comment period will run from May 20, 2026, to June 19, 2026

BRH: RLS