MEMO TO : File
Steel Reef Burke LLC (Steel Reef)
Lignite Compressor Station
Burke County, North Dakota

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

RE : Permit to Construct (PTC) Application (ACP-18362 v1.0)

DATE : November 3, 2026

Steel Reef submitted a PTC application for Lignite Gas Plant (facility) to the Department on April 9, 2025, with supplemental information provided on June 26, 2026. The facility currently operates under Air Operating Permit (AOP) No. AOP-28421 v6.0, which expires on January 14, 2027.

Steel Reef requested to modify their existing operations by converting the gas plant into a compressor station. Refer to Table 1-1 and Table 1-2 of ACP-18362 v1.0 for emission units that are new, modified, or incorporated, and for emission units that are being removed. The facility will remain subject to New Source Performance Standards (NSPS) Subpart OOOO and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT) Subparts HH and ZZZZ. Additionally, the facility will no longer be subject to NSPS Subpart KKK, several permit conditions were updated to the Department's PTC standard language, and the facility name has been changed to Lignite Compressor Station.

Upon issuance of this PTC, the facility will become a synthetic minor source. The facility's potential to emit (PTE), summarized in Table 1, is based on federally enforceable emission restrictions on the condensate tanks (EUs CTK1 through CTK3) and the produced water tank (EU WTK), limiting the allowable amount VOC emissions to less than 6 tpy and methane emissions to less than 20 tpy for each above storage vessel grouping (**cumulative**) and for each individual storage vessel on a 12-month rolling basis to avoid NSPS Subpart OOOOb applicability.

Table 1 – Facility PTE Summary. All units are in tons per year (tpy).[A]

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	Total PM	Total HAPs
TEG dehydration unit	Dehy	FL-9000	8.61	4.28	55.21	1.19	0.08	0.37
TEG vapor combustion device	FL-9000							
TEG reboiler	H-3060	H-3060	0.14	0.16	0.00	0.01	0.01	0.00
TEG flash tank	V-3030	FL-901	4.19	0.93	36.01	4.00	0.02	0.16
Process/emergency flare	FL-901							

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	CO	NO_X	SO_2	VOCs	Total PM	Total HAPs
Heater treater	HT-100	HT-100	0.18	0.21	0.00	0.01	0.02	0.00
Heater treater PSV emergency flare	FL-902	FL-902	0.59	0.32	0.00	1.86	0.00	0.21
Emergency generator engine	G-100	G-100	0.58	2.71	0.18	0.22	0.19	0.00
Three 400 bbl condensate tanks	CTK1 through CTK3	FS-170	1.05	0.23	0.00	4.12	0.00	1.03
400 bbl produced water tank	WTK							
Storage tank vapor combustion device	FS-170							
Condensate truck loading	TL-1	TL-1	--	--	--	7.17	--	0.82
Produced water truck loading	TL-2	TL-2	--	--	--	0.00	--	0.00
200-bbl methanol tank	TK-M1	TK-M1	--	--	--	0.17	--	0.17
12-bbl methanol tank	TK-M2	TK-M2	--	--	--	0.01	--	0.00
Blowdowns	BD	BD	--	--	--	14.9	--	0.75
Fugitive emissions	FUG1 & FUG	FUG1 & FUG	--	--	--	37.82	--	1.34
Total (without Fugitives):			**14.7**	**8.5**	**91.4**	**31.8**	**0.3**	**3.3**
Total (with Fugitives):			**14.7**	**8.5**	**91.4**	**69.6**	**0.3**	**4.6**

[A] Abbreviations:
Total PM: 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

After a complete review of the proposed project 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 the Lignite Compressor Station following the completion of a thirty-day public comment period. The public comment period will run from November 9, 2026, through December 9, 2026.

BRH: RLS

DRAFT