

**AIR POLLUTION CONTROL
PERMIT TO CONSTRUCT**

Pursuant to Chapter 23.1-06 of the North Dakota Century Code, and the Air Pollution Control Rules of the State of North Dakota (Article 33.1-15 of the North Dakota Administrative Code), and in reliance on statements and representations heretofore made by the owner designated below, a Permit to Construct is hereby issued authorizing such owner to construct and initially operate the source unit(s) at the location designated below. This Permit to Construct 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 below:

I. General Information:

A. Permit to Construct Number: ACP-18215 v1.0

B. Source:

1. **Name:** Robinson Lake Gas Plant
2. **Location:** NW ¼, NW ¼, Sec. 23, T153N, R91W
Mountrail County, North Dakota
48.065965, -102.35095
3. **Source Type:** Natural gas processing plant
4. **Emission Units Associated with this Permit Action:**

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Ethylene glycol (EG) dehydration unit rated at 87.5 MMscfd	DEHY-1	FLARE-3	Still Vent-Condenser & Flare (FLARE-3)
EG dehydration unit rated at 87.5 MMscfd	DEHY-2	FLARE-3	Still Vent-Condenser & Flare (FLARE-3)
Triethylene glycol (TEG) dehydration unit rated at 60.0 MMscfd (HH)	DEHY-3	RBLR-3 & FLARE-2	Flash tank overheads routed to RBLR-3 as fuel gas. Condenser & Flare (FLARE-2)

C. Owner/Operator (Permit Applicant):

1. Name: Andeavor Field Services LLC
2. Address: 1611 E Century Avenue, Suite 300
Bismarck, North Dakota 58503
3. Application Date: July 20, 2023

II. Conditions:

This Permit to Construct allows the operation of the above-mentioned new or modified equipment at the source. The source may be operated under this Permit to Construct until a Permit to Operate is issued unless this permit is suspended or revoked. The source is subject to all applicable rules, regulations, and orders now or hereafter in effect of the North Dakota Department of Environmental Quality and to the conditions specified below.

- A. Emission Limits:** Emission limits from the operation of the source unit(s) identified in Item I.B of this Permit to Construct (hereafter referred to as "permit") are added as follows. No other emissions units or limits are modified with this permit. Source units not listed are subject to the applicable emission limits specified in the North Dakota Air Pollution Control Rules.

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Pollutant / Parameter	Emission Limit
Two ethylene glycol (EG) dehydration units rated at 87.5 MMscfd each	DEHY-1 & DEHY-2	FLARE-3	Dry Gas Throughput, annualized (MMscfd) Glycol Flow Rate, maximum (gpm)	87.5 MMscfd, See Condition II.B.1 13 gpm, See Condition II.B.2
Triethylene glycol (TEG) dehydration unit rated at 60.0 MMscfd	DEHY-3	RBLR-3 & FLARE-2	Dry Gas Throughput, annualized (MMscfd) Glycol Flow Rate, maximum (gpm)	60.0 MMscfd, See Condition II.C.1 10 gpm, See Condition II.C.2
Facility wide	N/A	N/A	Methanol (tpy)	4.9 tpy, See Condition II.D.1

B. Operational restrictions (EU DEHY-1 & DEHY-2):

1. EU DEHY-1 and DEHY-2 annual dry gas throughput shall not exceed 87.5 MMscfd determined on a 12-month rolling average. Monthly averages of dry gas throughput shall be tracked.

2. EU DEHY-1 and DEHY-2 glycol flow rate shall not exceed 13 gpm determined on a 12-month rolling average. Glycol pumps with design ratings that do not exceed the specified gpm rate shall be utilized.
3. Records shall be kept on file (in an easily accessible format, electronic or otherwise) for two years and shall be submitted to the Department upon request.

C. Operational restrictions (DEHY-3):

1. EU DEHY-3 annual dry gas throughput shall not exceed 60.0 MMscfd determined on a 12-month rolling average. Monthly averages of dry gas throughput shall be tracked.
2. EU DEHY-3 glycol flow rate shall not exceed 10 gpm determined on a 12-month rolling average. Glycol pumps with design ratings that do not exceed the specified gpm rate shall be utilized.
3. Records shall be kept on file (in an easily accessible format, electronic or otherwise) for two years and shall be submitted to the Department upon request.

D. Methanol Emissions Restriction:

1. A record shall be maintained of the combined methanol emissions from the facility. The facility shall not exceed 4.9 tons per year of methanol emissions determined on a 12-month rolling average. The emissions records shall be kept on file (in an easily accessible format, electronic or otherwise) for two years and shall be submitted to the Department upon request.

E. National Emissions Standards for Hazardous Air Pollutants (NESHAP): The permittee shall comply with all applicable requirements of the following NESHAP subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-22 of the North Dakota Air Pollution Control Rules and 40 CFR 63.

1. 40 CFR 63, Subpart HH – National Emissions Standards for Hazardous Air Pollutants From Oil and Natural Gas Production Facilities (EU DEHY-3). 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

- F. **Best Management Practices:** At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- G. **Organic Compounds Emissions:** The permittee shall comply with all applicable requirements of NDAC 33.1-15-07 – Control of Organic Compounds Emissions.
- H. **Title V Permit to Operate:** Within one year after startup of the units covered by this Permit to Construct, the permittee shall submit a permit application for a Title V Permit to Operate for the facility.
- I. **Fugitive Emissions:** The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.
- J. **Annual Emission Inventory/Annual Production Reports:** The permittee shall submit an annual emission inventory report and/or an annual production report upon Department request, on forms supplied or approved by the Department.
- K. **Source Operations:** Operations at the installation shall be in accordance with statements, representations, procedures and supporting data contained in the initial application, and any supplemental information or application(s) submitted thereafter. Any operations not listed in this permit are subject to all applicable North Dakota Air Pollution Control Rules.
- L. **Alterations, Modifications or Changes:** Any alteration, repairing, expansion, or change in the method of operation of the source which results in the emission of an additional type or greater amount of air contaminants or which results in an increase in the ambient concentration of any air contaminant must be reviewed and approved by the Department prior to the start of such alteration, repairing, expansion or change in the method of operation.
- M. **Recordkeeping:** The permittee shall maintain any compliance monitoring records required by this permit or applicable requirements. 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 sample, measurement, report or application. Support information may include all calibration and maintenance records and all original strip-chart recordings/computer printouts for continuous monitoring instrumentation, and copies of all reports required by the permit.
- N. **Nuisance or Danger:** This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.

- O. **Malfunction Notification:** The permittee shall notify the Department of any malfunction which can be expected to last longer than twenty-four hours and can cause the emission of air contaminants in violation of applicable rules and regulations.
- P. **Operation of Air Pollution Control Equipment:** The permittee shall maintain and operate all air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- Q. **Transfer of Permit to Construct:** The holder of a permit to construct may not transfer such permit without prior approval from the Department.
- R. **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 at which the source listed in Item I.B of this permit is located at any time for the purpose of ascertaining the state of compliance with 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.
- S. **Other Regulations:** The permittee of the source unit(s) described in Item I.B of this permit shall comply with all State and Federal environmental laws and rules. In addition, the permittee shall comply with all local burning, fire, zoning, and other applicable ordinances, codes, rules and regulations.
- T. **Permit Issuance:** This permit is issued in reliance upon the accuracy and completeness of the information set forth in the application. Notwithstanding the tentative nature of this information, the conditions of this permit herein become, upon the effective date of this permit, enforceable by the Department pursuant to any remedies it now has, or may in the future have, under the North Dakota Air Pollution Control Law, NDCC Chapter 23.1-06.
- U. **Odor Restrictions:** The permittee shall not discharge into the ambient air any objectionable odorous air contaminant which is in excess of the limits established in NDAC 33.1-15-16.

- V. **Sampling and Testing:** The Department may require the permittee to conduct tests to determine the emission rate of air contaminants from the source. The Department may observe the testing and may specify testing methods to be used. A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline.

FOR THE
NORTH DAKOTA DEPARTMENT
OF ENVIRONMENTAL QUALITY

Date: _____ By: _____
James L. Semerad
Director
Division of Air Quality

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