



September 17, 2014

Mr. Daniel Holli
Plains Pipeline, L.P.
P.O. Box 708
Belfield, ND 58622

Re: Air Pollution Control
Permit to Construct

Dear Mr. Holli:

Pursuant to the Air Pollution Control Rules of the State of North Dakota, the Department of Health has reviewed your permit application submitted August 22, 2014 to obtain a Permit to Construct for addition of a 150,000 barrel tank and to establish a throughput limit on the 400 barrel tanks at the facility.

Enclosed is a copy of the Department's Air Quality Effects Analysis for the facility modification, along with a draft copy of the Permit to Construct. Before making final determinations on the permit application, the Department of Health must solicit public comment by means of the enclosed public notice. As indicated in the notice, the public comment period will begin on September 22, 2014 and end on October 22, 2014.

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 within thirty days after the end of the public comment period. You will be notified in writing of our final determination.

If you have any questions, please contact me at (701)328-5188.

Sincerely,

Craig D. Thorstenson
Environmental Engineer
Division of Air Quality

CDT:saj

Enc:

xc/enc: Mike Owens, EPA (email)

NOTICE OF INTENT TO ISSUE AN
AIR POLLUTION CONTROL
PERMIT TO CONSTRUCT

Take notice that the North Dakota Department of Health proposes to issue an Air Pollution Control Permit to Construct to Plains Pipeline, L.P. in accordance with the North Dakota Air Pollution Control Rules. The project involves the construction of a new 150,000 barrel storage tank and establishment of throughput limits at the existing Robinson Lake Crude Oil Station located at Section 23, Township 153 North, Range 91 West near New Town in Mountrail County, North Dakota.

Preliminary evaluations made by Department staff indicate that the project will comply with all applicable Air Pollution Control Rules and there will be no significant detrimental effects to air quality.

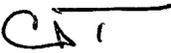
A 30-day public comment period for the proposed permit will begin September 22, 2014 and end on October 22, 2014. Direct comments, in writing, to the North Dakota Department of Health, Division of Air Quality, 918 E Divide Avenue, Bismarck, ND 58501-1947. Comments must be received during the public comment period to be considered in the final permit determination.

A public meeting regarding issuance of the Permit to Construct will be held if a significant degree of public interest exists as determined by the Department. Requests for a public meeting must be received in writing by the Department before the end of the public comment period. The application, Department analysis and draft permit are available for review at the above address and on-line at <http://ndhealth.gov/AQ/Notices.htm>. A copy of these documents may be obtained by writing to the Division of Air Quality or contacting Craig Thorstenson at (701)328-5188 or by email at cthorstenson@nd.gov.

Dated this 17th day of September, 2014.

Terry L. O'Clair, P.E.
Director
Division of Air Quality

MEMO TO : File
Plains Pipeline
Robinson Lake Pump Station
Mountrail County

FROM : Craig D. Thorstenson 
Environmental Engineer
Division of Air Quality
North Dakota Department of Health

RE : Facility Modification

DATE : September 17, 2014

Plains Pipeline submitted a permit application on August 22, 2014 to modify the Robinson Lake Pump Station by adding a 150,000 bbl tank.

Potential emissions are calculated as follows:

Emission Unit Description	EU ID	Throughput (bbl/yr)	Control Equipment	VOCs (tpy)
20,000 bbl tank	1	20,732,000	IFR*	7.72
400 bbl tanks (4)	2-5	2,628,000**	None	80.96
150,000 bbl tank (new)	6	25,550,000	IFR	8.69
Fugitive emissions	FUG	N/A	None	0.16
Total				97.53
Total (excluding fugitives)				97.37

* Internal floating roof.

** Proposed throughput limit.

The new tank will be subject to NSPS Subpart Kb. An internal floating roof is one method of complying with NSPS Subpart Kb.

With the throughput restriction, the facility remains a minor source under the Title V rules. It is recommended that a Permit to Construct be issued which restricts the throughput through the 400 barrel tanks to 2,628,000 bbl/yr. A 30-day public comment period and concurrent EPA review is required prior to permit issuance.

CDT:



**AIR POLLUTION CONTROL
PERMIT TO CONSTRUCT**

Pursuant to Chapter 23-25 of the North Dakota Century Code, and the Air Pollution Control Rules of the State of North Dakota (Article 33-15 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 Health and to any conditions specified below:

I. General Information:

A. Permit to Construct Number: PTC14054

B. Source:

1. **Name:** Robinson Lake Pump Station
2. **Location:** Sec. 23, T153N, R91W
Mountrail County, North Dakota
3. **Source Type:** Crude Oil Storage Tanks
4. **Equipment at the Facility:**

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Existing:			
One 20,000 (840,000 gallon) barrel crude oil storage tank (2009) (Subpart Kb)	1	1	IFR
Two 400-barrel (16,800 gallon) crude oil storage tanks (2009)	2, 3	2, 3	None
Two 400-barrel (16,800 gallon) crude oil storage tanks (2012)	4,5	4,5	None

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
New:			
One 150,000 (6,300,000 gallon) crude oil storage tank (2014) (Subpart Kb)	6	6	IFR

C. Owner/Operator (Permit Applicant):

1. Name: Plains Pipeline, L.P.
2. Address: P.O. Box 708
Belfield, ND 58622
3. Application Date: August 22, 2014

II. Conditions: This Permit to Construct allows the construction and initial 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 Health and to the conditions specified below.

A. New Source Performance Standards (NSPS) for Storage Tank(s): The owner/operator shall operate the storage tank(s) in accordance with the following applicable requirement(s):

- 40 CFR Part 60, 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, as incorporated by reference into NDAC 33-15-12.

B. Throughput Restriction: EUs 2, 3, 4 and 5 are restricted to a combined throughput restriction of 2,628,000 barrels of crude oil per year.

By the 15th day of each month, the owner/operator shall record the combined crude oil throughput for EUs 2, 3, 4 and 5 for the previous month and for the previous 12 months (12-month rolling total). If the actual combined crude oil throughput for EUs 2, 3, 4 and 5 exceeds 2,628,000 barrels in any 12-month period, the permittee shall notify the Department in writing within 15 days of the date the record was made.

- C. **Organic Compounds Emissions:** The facility shall comply with the applicable requirements of NDAC 33-15-07, Control of Organic Compounds Emissions.
- D. **Construction:** Construction of the above described facility shall be in accordance with information provided in the permit application as well as any plans, specifications and supporting data submitted to the Department. The Department shall be notified ten days in advance of any significant deviations from the specifications furnished. The issuance of this Permit to Construct may be suspended or revoked if the Department determines that a significant deviation from the plans and specifications furnished has been or is to be made.
- Any violation of a condition issued as part of this permit to construct as well as any construction which proceeds in variance with any information submitted in the application, is regarded as a violation of construction authority and is subject to enforcement action.
- E. **Startup Notice:** A notification of the actual date of initial startup of EU 6 shall be submitted to the Department within 15 days after the date of initial startup. The date of the initial fill of the tank shall be considered the date of initial startup.
- F. **Permit Invalidation:** This permit shall become invalid if construction is not commenced within eighteen months after issuance of such permit, if construction is discontinued for a period of eighteen months or more; or if construction is not completed within a reasonable time.
- G. **Fugitive Emissions:** All reasonable precautions shall be taken by the owner/operator to prevent and/or minimize fugitive emissions from the construction and operation of the source identified under Item I.B.
- H. **Annual Emission Inventory/Annual Production Reports:** The owner/operator shall submit an annual emission inventory report or an annual production report, upon request, on forms supplied or approved by the Department.
- I. **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.
- J. **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.

- K. **Recordkeeping:** The owner/operator shall maintain any compliance monitoring records required by this permit or applicable requirements. The owner/operator 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.
- L. **Nuisance or Danger:** This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.
- M. **Malfunction Notification:** The owner/operator 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.
- N. **Operation of Air Pollution Control Equipment:** The owner/operator shall maintain and operate all air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- O. **Change of Ownership:** This permit may not be transferred 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.
- P. **Right of Entry:** Any duly authorized officer, employee or agent of the North Dakota Department of Health 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.
- Q. **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 23-25. Each and every condition of this permit is a material part thereof, and is not severable.

R. **Other Regulations:** The owner/operator 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 owner/operator shall comply with all local burning, fire, zoning, and other applicable ordinances, codes, rules and regulations.

S. **Odor Restrictions:** The owner/operator shall not discharge into the ambient air any objectionable odorous air contaminant which is in excess of the limits established in NDAC 33-15-16 and NDCC 23-25-11.

The owner/operator shall not discharge into the ambient air hydrogen sulfide (H₂S) 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 33-15-16-04 constitute a violation.

T. **Sampling and Testing:** The Department may require the owner/operator 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 33-15-01-12 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 owner/operator shall follow the procedures and formats in the Department's Emission Testing Guideline.

FOR THE NORTH DAKOTA
DEPARTMENT OF HEALTH

Date _____

By _____
Terry L. O'Clair, P.E.
Director
Division of Air Quality