
12.0 AIR QUALITY

12.1 EXISTING AIR QUALITY

The counties in which the Project will be constructed and operated are all designated as in attainment or unclassifiable for the National Ambient Air Quality Standards for all criteria pollutants: carbon monoxide (CO), lead (Pb), nitrogen oxides (NO_x), ozone (O₃), particulate matter less than 2.5 microns in diameter (PM_{2.5}), particulate matter less than 10 microns in diameter (PM₁₀), and sulfur dioxide (SO₂).

12.2 APPLICABLE AIR QUALITY RULES

The following state and federal air quality regulations will apply to the Project:

- 40 C.F.R. Part 60 Subpart Kb will apply to the new floating roof storage tanks constructed at the new Sandpiper Clearbrook Terminal.
- The Project scope at the new Sandpiper Clearbrook Terminal will be subject to Minnesota permitting requirements under Minnesota Administrative Rules Chapter 7007.
- Gasoline and diesel engines used for construction are subject to federal mobile source emission regulations found in 40 C.F.R. Part 85.

12.3 GENERAL CONSTRUCTION AND OPERATION IMPACTS AND MITIGATION

Construction and operation of the Project is not expected to have a significant impact on air quality. Construction of the pipelines and associated facilities could result in intermittent and short-term fugitive emissions. These emissions would include dust from soil disruption and combustion emissions from the construction equipment. The fugitive dust emissions would depend on the moisture content and texture of the soils that would be disturbed. However, emissions from construction are not expected to cause or significantly contribute to a violation of an applicable ambient air quality standard because the construction equipment would be operated on an as-needed basis, primarily during daylight hours. Emissions from the gasoline and diesel engines would be minimized because the engines must be built to meet the standards for mobile sources established by the EPA mobile source emission regulations (Title 40 C.F.R. Part 85). In addition, the EPA requires that the maximum sulfur content of diesel fuel for highway vehicles is 15 parts per million.

NDPC's EPP specifies that to minimize dust generated from construction activities, the contractor will take all reasonable steps to control dust near residential areas and other areas as directed by NDPC. Control practices may include wetting soils on the right-of-way, limiting working hours in residential areas, and/or additional measures as appropriate based on site-specific conditions. The use of dust suppression techniques will minimize fugitive

dust emissions during construction of the project, thereby minimizing potential air quality impacts on nearby residential and commercial areas.

The scope of work at the new NDPC Clearbrook Terminal will be subject to air permitting requirements found in Minnesota Administrative Rules Chapter 7007. NDPC plans to submit a stationary source applicability determination request to the MPCA regarding the stationary source status of the proposed new terminal. NDPC will submit an appropriate air permit application based on the result of stationary source determination. NDPC will complete the required New Source Performance Standards notifications and submittals for the new storage tanks. The potential emissions at the new NDPC Clearbrook Terminal will be Volatile Organic Compounds ("VOC") from new external floating roof storage tanks, piping components (such as valves, pump seals, and flanges), fugitive emissions, and pipeline operations equipment and is estimated to be approximately less than 24 tons of VOC per year.