

MEMO TO : File
 Crusoe Energy Systems, Inc. (Crusoe)
 Hulk Central Delivery Point (CDP)
 Williams, North Dakota

FROM : Kari Thorsteinson *KT*
 Environmental Scientist
Division of Air Quality
 North Dakota Department of Environmental Quality (Department)

RE : Permit to Construct (PTC) ACP-18228 v1.1

DATE : June 22, 2026

Crusoe submitted a PTC application for Hulk CDP (facility) to the Department on February 17, 2026, with a revision on March 23, 2026. The facility currently operates under ACP-18228 v1.0, issued on July 22, 2024.

Crusoe requested as-built revisions to ACP-18228 v1.0 of the power generation station facility to remove emission units that are no longer planned, correct the size of the emergency generator, and slightly raise the VOC emission limit for the generator engine. The facility will be reclassified from a Title-V source to a synthetic minor source. Emission unit (EU) and emission point (EP) numbers were updated in ACP-18228 v1.1. Facility Potential to Emit (PTE) decreased as summarized in Table 1. PTE is based on the federally enforceable emission restriction on engines and turbines, limiting the allowable amount of NO_x, CO, and VOC.

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

Emission Unit Description	EU	EP	NO_x	CO	SO₂	VOC	PM	PM₁₀	PM_{2.5}	Total HAP
Compressor engine	1	1	0.8	1.5	0.2	0.2	0.1	0.1	0.1	0.3
Compressor engine	2	2	0.8	1.5	0.2	0.2	0.1	0.1	0.1	0.3
Generator engine	3	3	3.6	7.2	0.6	0.7	0.2	0.2	0.2	0.9
Turbine	4	4	56.8	68.9	3.6	26.7	3.9	3.9	3.9	0.6
Emergency generator engine	5	5	1.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Total:			63.0	79.2	4.9	27.7	4.2	4.2	4.2	2.0

A complete review was done in the ACP-18228 v 1.0 Air Quality Effects Analysis indicating that the facility is expected to comply with applicable federal and state air pollution rules and regulations. As the PTE of the facility has decreased with the proposed project, a new analysis was not needed. The Department will make a recommendation on PTC issuance for Crusoe Hulk CDP following the completion of a thirty-day public comment period. The public comment period will run from June 27, 2026, through July 26, 2026.

KMT: RLS