

MEMO TO : File
Tesoro High Plains Pipeline Company, LLC (Tesoro)
Charlson Station
McKenzie, North Dakota

FROM : Michaela Rose
Environmental Scientist
Division of Air Quality
North Dakota Department of Environmental Quality (Department)

RE : July 30, 2026, Permit to Construct (PTC) ACP-18353 v1.0

DATE : October 9, 2026

The Department initiated a PTC for Charlson Station (facility) on July 20, 2026. The facility currently operates under extended Permit to Operate No. AOP-28160 v4.0. This PTC was initiated due to the rescindment of Department policy¹ and a determination that incorporation of legally and practically enforceable emission restrictions is best accomplished through PTC issuance.

On September 27, 2016, Tesoro requested synthetic minor limits on each of the three 400-barrel storage tanks (EUs 2 through 4) of less than 6 tons per year (tpy) volatile organic compounds (VOC) to remain below the affected facility level of 40 CFR 60, Subpart OOOOa. Since then, Subpart OOOOb has been issued, and Tesoro has not triggered the affected facility threshold for the tank battery. This threshold is 6 tpy VOC and 20 tpy methane for the tank battery (EUs 2 through 4). To ensure continued nonaffected tank battery status, PTC No. ACP-18353 v1.0 establishes synthetic minor limits on VOC and methane emissions. Facility Potential to Emit (PTE) is summarized in Table 1. PTE is based on the federally enforceable emission restriction on EU 2 through 4 to remain below 6 tpy of VOC and 20 tpy methane.

¹ See: https://www.deq.nd.gov/publications/AQ/policy/PC/Storage_Vessel_Rescindment.pdf (last visited July 27, 2026)

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

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	NO _x	CO	SO ₂	VOC	PM	PM ₁₀	PM _{2.5}	Total HAP
20,000 barrel crude oil storage tank (Tank 7207)	1	1	0.00	0.00	0.00	4.66	0.00	0.00	0.00	0.00
400 barrel storage tank	2	5	0.00	0.00	0.00	5.99	0.00	0.00	0.00	0.00
400 barrel storage tank	3		0.00	0.00	0.00		0.00	0.00	0.00	0.00
400 barrel storage tank	4		0.00	0.00	0.00		0.00	0.00	0.00	0.00
Tank Vapor Flare	5		0.01	0.06	0.00	0.03	0.00	0.00	0.00	0.00
Total :			0.0	0.1	0.0	10.7	0.0	0.0	0.0	0.0

Complete review of this proposed PTC indicates 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 Charlson Station following the completion of a thirty-day public comment period. The public comment period will run from October 14, 2026, through November 12, 2026.

MER: RLS