

**AIR EMISSION PERMIT NO. 17100019- 003**

**IS ISSUED TO**

**Northern States Power Company**

NSP - Monticello Nuclear Plant  
2807 West Highway 75  
Monticello, Wright County, MN 55362

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date	Issue Date	Action Number
Total Facility Operating Permit	09/15/1995	08/16/2000	001
Administrative Amendment	NA	11/14/2000	002
Major Amendment	10/30/2002	see below	003
Major Amendment	01/16/03		

This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Federal; Part 70/Major for NSR

**Issue Date:** May 6, 2003

**Expiration:** August 16, 2005

All Title I Conditions do not expire.

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Ann M. Foss  
Major Facilities Section Manager  
Majors and Remediation Division

for Sheryl A. Corrigan  
Commissioner  
Minnesota Pollution Control Agency

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

**PERMIT SHIELD:**

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

**FACILITY DESCRIPTION:**

This air emission facility is part of the Northern States Power Monticello Nuclear Generating Plant. The air emission facility is composed of oil and gas-fired heating boiler, four emergency diesel generators, and one emergency fire pump diesel engine.

**PER 002**

PER 002 was an Administrative Amendment initiated by the Agency to clarify the permit term 'EU 007/EU 008 temporary diesel-fired engines' in GP 001 in Table A.

**PER 003**

PER 003 is a major amendment to revise computer dispersion modeling requirements, based on the August 10, 2001, modeling policy. The original permit contained requirements for submittal of a modeling protocol and modeling results. These have been replaced by a single requirement for submittal of modeling information. This major amendment also reduces the EU 001 heating boiler fuel oil sulfur content limit, adds propane for use as an ignition fuel for fuel oil combustion in the heating boiler, and removes the heating boiler distillate fuel oil operating hours limit.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

**Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.**

**Subject Item:****Total Facility**

<b>What to do</b>	<b>Why to do it</b>
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
General Performance Test (PT) Requirements:  Performance Tests are due as outlined in Tables A and B of the Permit. See Table B for additional testing requirements.  PT Notifications (written): due 30 days before each Performance Test PT Plan: due 30 days before each Performance Test PT Pre-test Meeting: due 7 days before each Performance Test PT Report: due 45 days after each Performance Test PT Report-Microfiche: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1 and 2
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B, and C of Minn. R. 7019.1000, subp. 3.  At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B, and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). The Report shall be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

# TABLE A: LIMITS AND OTHER REQUIREMENTS

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

**Subject Item:** GP 001 Diesel Engines

**Associated Items:** EU 002 Diesel Generator 11  
EU 003 Diesel Generator 12  
EU 004 Security Diesel Generator  
EU 005 Fire Pump Diesel Engine  
EU 006 Diesel Generator 13  
EU 007 Temporary Engine > 600 Hp  
EU 008 Temporary Engine < 600 Hp

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS - ALL GP 001 EMISSION UNITS	hdr
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (equivalent to a distillate fuel oil sulfur content of 0.49% by weight) for each emission unit in GP 001.	Minn. R. 7011.2300, subp. 2
Sulfur Content of Fuel: less than or equal to 0.49 percent by weight for distillate fuel oil for each emission unit in GP 001.	Minn. R. 7007.0800, subp. 2
Opacity: less than or equal to 20 percent opacity once operating temperature has been attained for each emission unit in GP 001.	Minn. R. 7011.2300, subp. 1
Permitted Fuels: Distillate fuel oil only for each emission unit in GP 001.	Minn. R. 7007.0800, subp. 2
EU 007 and EU 008 Temporary Diesel Engines: The Permittee may operate temporary diesel fuel-fired engines at the facility providing the engines meet all applicable emission limits and fuel requirements in this subject item.  A temporary engine is any engine that is not located and/or operated at the facility for more than twelve consecutive months, and does not include emission units 002, 003, 004, 005, or 006. Any temporary engine that is operating in place of EU 006 is subject to the operating hours recordkeeping requirements of EU 006. A temporary engine shall not operate at the same time as the engine it is replacing, except for up to eight hours during startup and shutdown transitions. Temporary engines must have potential emission rates in pounds per hour for all criteria pollutants that are less than permit emission limits and the potential emission rates of the permanent engines they are replacing.	Minn. R. 7007.0800, subp. 2
Fuel Supplier Certification: The Permittee shall obtain a single certification from the fuel supplier that guarantees a maximum sulfur content in all fuel oil deliveries thereafter. The single certification shall also state that the supplier will notify the Permittee in writing on the date of delivery of fuel oil with a sulfur content exceeding the guaranteed maximum, that the fuel oil sulfur content exceeds the guaranteed maximum value.	Minn. R. 7007.0800, subp. 4 and 5
PERFORMANCE TESTING REQUIREMENTS - EU 002, EU 003, and EU 006.	hdr
Initial Performance Test: due 180 days after 08/16/2000 to measure opacity of EU 002, 003, and 006.  For additional applicable performance test requirements, see "General Performance Test Requirements" in Table A, Subject Item "Total Facility".	Minn. R. 7017.2020, subp. 1
REQUIREMENTS APPLICABLE ONLY TO EU 006 (Diesel Generator 13)	hdr
Operating Hours: less than or equal to 1250 hours/year using 12-month Rolling Sum	Title I Condition: To avoid major modification status for NOx according to 40 CFR Section 52.21
Nitrogen Oxides: less than or equal to 4.0 lbs/million Btu heat input	Title I Condition: To avoid major modification status for NOx according to 40 CFR Section 52.21
Recordkeeping - EU 006 Operating Hours: By the last day of each month, the Permittee shall record the number of hours that EU 006 was operated during the previous month and during the previous 12-month period.	Title I Condition: Recordkeeping to avoid major modification status for NOx according to 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5
Performance Test: due before end of each 60 months starting 12/31/2000 to measure EU 006 NOx emissions. The first test is due by December 31, 2000.  For additional applicable performance test requirements, see "General Performance Test Requirements" in Table A, Subject Item "Total Facility".	Title I Condition: Performance testing to avoid major modification status for NOx according to 40 CFR Section 52.21; Minn. R. 7017.2020, subp. 1

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

**Subject Item:** EU 001 Boiler**Associated Items:** SV 001

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.3 percent by weight for distillate fuel oil.	Title I Condition: To avoid major modification status for SO <sub>2</sub> according to 40 CFR Section 52.21; meets requirements of 40 CFR Section 60.42c(d)
Recordkeeping - Quantity of Fuel Combusted in EU 001: Once each month the Permittee shall record the quantity of each fuel combusted in EU 001 during the previous calendar month. Records may be in the form of meter readings or fuel bills.	40 CFR Section 60.48c(g) and February 20, 1992, EPA memorandum
<p>Fuel Supplier Certification: Obtain a certification from the fuel oil supplier for each fuel oil delivery, stating the following information:</p> <p>1) The name of the oil supplier;  2) A statement from the supplier that the oil meets the definition of distillate oil in 40 CFR Section 60.41c, and that the sulfur content does not exceed 0.3% by weight.</p> <p>In lieu of a certification for each delivery, the Permittee may elect to obtain a single certification from the fuel supplier guaranteeing a maximum sulfur content in all fuel oil deliveries thereafter, and containing the information required in items 1 and 2 above. The single certification shall also state that the supplier will notify the Permittee in writing on the date of delivery of fuel oil with a sulfur content exceeding the guaranteed maximum, that the fuel oil sulfur content exceeds the guaranteed maximum value.</p>	Minn. R. 7007.0800, subp. 2; meets requirements of 40 CFR Section 60.48c(f)
Permitted Fuels: Distillate fuel oil and natural gas only. In addition, propane may be used for ignition of distillate fuel oil during boiler start up, but may not be routinely combusted for steam generation.	Minn. R. 7007.0800, subp. 2
A temporary boiler may be brought onsite for a period of up to one year, for the purpose of providing steam, heat, or electric power in place of EU 001, when EU 001 is out of operation. The temporary boiler may not be operated at the same time as EU 001 except for up to eight hours during start-up and shutdown transition periods. The temporary boiler must have potential emission rates in lbs/hour for all criteria pollutants that are less than the permit emission limits and potential emission rates of EU 001. All fuel usage by any temporary boiler shall be included in the fuel usage recordkeeping required under this subject item.	Minn. R. 7007.0800, subp. 2



## TABLE B: SUBMITTALS

05/06/03

Facility Name: NSP - Monticello Nucle  
Permit Number: 17100019 - 003

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor  
Permit Section  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor  
Compliance Determination Unit  
Air Quality Division  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak  
Air and Radiation Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency  
Clean Air Markets Division  
1200 Pennsylvania Avenue NW (6204N)  
Washington, D.C. 20460

**TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Information	due 1,096 days after 08/16/2000. Submit modeling data as specified in MPCA guidance for Modeling Information Requests for SO <sub>2</sub> , and NO <sub>x</sub> . This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Performance Test Report - Microfiche Copy	due 105 days after Initial Performance Test to measure opacity of EU 002, 003, and 006.	GP001
Performance Test Report	due 45 days after Initial Performance Test to measure opacity of EU 002, 003, and 006.	GP001

**TABLE B: RECURRENT SUBMITTALS**

05/06/03

Facility Name: NSP - Monticello Nucle

Permit Number: 17100019 - 003

What to send	When to send	Portion of Facility Affected
Quarterly Report	due 30 days after end of each calendar quarter starting 08/16/2000 . The report shall indicate the calendar dates covered in the report, and contain a copy of the fuel supplier certification for each fuel delivery received during the quarter and a statement signed by the Permittee that the certifications submitted represent all of the fuel combusted during the calendar quarter.	EU001
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 08/16/2000 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 08/16/2000 (for the previous calendar year). The Certification shall be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility
Performance Test Report - Microfiche Copy	due 105 days after end of each calendar year following Initial Performance Test to measure EU 006 NOx emissions (105 days after each Performance test).	GP001
Performance Test Report	due 45 days after end of each calendar year following Initial Performance Test to measure EU 006 NOx emissions (45 days after each Performance Test).	GP001

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT NO. 17100019-003**

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

## **1. General Information**

### **1.1. Applicant and Stationary Source Location:**

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 4911)
Northern States Power dba Xcel Energy 414 Nicollet Mall Minneapolis, Minnesota 55401-1993 (612) 337-2287	2807 West Highway 75 Monticello Wright County, Minnesota 55362 (612) 295-1006

### **1.2. Description Of The Facility**

This air emission facility is part of the Northern States Power Monticello Nuclear Generating Plant. The air emission facility is composed of an oil and gas-fired heating boiler, four emergency diesel generators, and one emergency fire pump diesel engine.

### **1.3 Description of the Activities Allowed By This Permit Action**

This permitting action revises computer dispersion modeling requirements, based on the August 10, 2001, modeling policy. The original permit contained requirements for submittal of a modeling protocol and modeling results. These have been replaced by a single requirement for submittal of modeling information. This major amendment also includes a second major amendment application to reduce the EU 001 heating boiler fuel oil sulfur content limit, add propane for use as an ignition fuel for fuel oil combustion in the heating boiler, and remove the heating boiler distillate fuel oil operating hours limit.

### **1.4. Facility Emissions:**

Table 1. Emissions Changes Allowed By This Amendment

EU #	PM tpy	PM <sub>10</sub> tpy	SO <sub>2</sub> tpy	NO <sub>x</sub> tpy	CO tpy	VOC tpy	Pb tpy
EU 001	+ 1.26	+ 0.87	+ 1.07	+ 7.6	0	0	+ 0.0005

## 2. Regulatory Overview of Units Affected by the Modification

### Summary of Regulatory and/or Statutory Basis of Amended Permit Requirements

	Applicable Regulations	Comments
Total Facility	Minn. R. 7007.0800, subp. 2	Computer Dispersion Modeling Information
EU 001	Title I Condition	Distillate fuel oil sulfur content limit to restrict SO <sub>2</sub> to less than major modification status under NSR

## 3. Technical Information

Title V Computer Dispersion Modeling: This major amendment revises Title V modeling requirements based on the policy dated August 10, 2001. As a result, this draft permit requires only submittal of modeling information.

The following table shows permitted potential and actual emissions.

	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>
Maximum Actual Emissions To Qualify As A Small Title V Source (Tons)	100	250	1000
Permitted Emissions	54.7	154	802
2001 Actual Emissions	0.35	10.37	6.14

Therefore, the facility fits the requirements for submittal of Computer Dispersion Modeling Information, instead of a modeling protocol and modeling results.

In addition, at the request of Agency staff, the Permittee conducted the SCREEN3 modeling exercise in the EC-03 form. The modeling showed the total maximum impact from all reciprocating engines at the nearest occupied structure was less than the target level for each pollutant averaging time period.

Changes to EU 001 Title I Conditions: The Permittee has requested removal of the 5113 hr/yr operating limit and reduction of the 0.5% sulfur content in distillate fuel oil to 0.3% by weight, in order to continue to restrict EU 001 SO<sub>2</sub> permitted emissions to less than the 40 tpy significant emissions level.

Permitted emission changes due to the distillate fuel oil operating hours removal and reduction of sulfur content, are due to the increase in operating hours from 5113 to 8760 hours per year. Note that only PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and Lead emissions changed because distillate oil is worst case for these pollutants. Natural gas is worst case for VOC and CO, and there were no operating limits on natural gas, so permitted CO and VOC emissions do not change.

In addition, propane has been added as a fuel but only for startup ignition of distillate fuel oil.

See PER 001 technical support document for additional facility information.

Environmental Review: This permitting action does not require environmental review.

Comments during public notice or EPA review: No comments were received during the public notice period or the EPA 45-day review period.

#### **4. Conclusion**

Based on the information provided by NSP dba Xcel Energy - Monticello, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 17100019-003 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall Cole, Betsy Randt