

## Minnesota Pollution Control Agency Air Regulatory and Technical Information Updates

### GovDelivery

The Air Regulatory and Technical Information updates provide subscribers with regulatory updates, program information, technical guidance, and notice of significant air quality Web site changes. It is geared to regulated facilities, consultants, attorneys, and other organizations with an interest in regulatory point source issues.

To subscribe or unsubscribe to the alerts, visit the [Air Regulatory and Technical Information](#) subscription page.

All past articles will be placed in this .pdf document, with the oldest dating back to 2004. They will be placed chronologically within this file, with the most recent articles at the beginning. Articles will be dated by month, day and year (mm-dd-yy).

More information regarding Air-Related Technical information can be found at this link: [MPCA – Air Regulatory and Technical Information Updates](#).

If you have any questions regarding this Listserv, please contact Sandra Simbeck at [sandra.simbeck@state.mn.us](mailto:sandra.simbeck@state.mn.us) or at 651-757-2725.

**June 8, 2011**

**E-MAIL SUBMITTAL NOW ALLOWED FOR ROUTINE AIR QUALITY REPORTING**

The MPCA has developed a new submittal format for routine air quality reporting. Effective June 8, 2011, the MPCA will accept the following reports by e-mail attachment:

- Excess Emission Reports
- Cylinder Gas Audit (CGA) Reports
- Linearity and Leak Check Test Reports
- Relative Accuracy Test Audits (RATA) Reports
- Calibration Error Audits (CEA)
- Semiannual Deviation Reports
- Annual Compliance Certifications
- Quarterly Reports
- Applicable National Emissions Standards for Hazardous Air Pollutants (NESHAP) Reports.

For those reports that require it, the MPCA will accept the reports without the separate signed certification statement.

The intention of this new submittal format is to streamline the reporting process. You are encouraged, but not required, to submit these reports through this format. Please see the attached letter for directions on how to submit acceptable reports and for additional information.

*NOTE: Past Air Regulatory and Technical Information updates are available [here](#).*

May 23, 2011

## **2012 Air Monitoring Network Plan**

The Minnesota Pollution Control Agency (MPCA) has released the 2012 Air Monitoring Network Plan for public review and comment from May 23, 2011 through June 22, 2011. The annual report provides an overview of the various air quality monitoring networks currently operating in Minnesota. Data for several pollutants are summarized to show current conditions relative to State and Federal air quality standards. Details regarding the location of individual sites, monitoring objectives, and proposed changes are provided.

Instructions for submitting comments and the draft plan can be found at [Air Monitoring Network Plan - Minnesota Pollution Control Agency](#). For more information please call Rick Strassman, MPCA Air Monitoring Unit Supervisor at 651-757-2760.

*NOTE: Past Air Regulatory and Technical Information updates are available [here](#).*

April 20, 2011

### **Stack Testing to Determine Emission Factors May Be Required for Emissions Increases**

If you apply for an amendment to your Part 70 or State Air Emissions Permit to increase particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>) or nitrogen dioxide (NO<sub>2</sub>) emissions, the MPCA may include permit conditions requiring that you conduct stack tests to measure your emissions of that pollutant. The MPCA will require this testing to expedite air quality dispersion modeling that may be required in the future.

Facilities in Minnesota may be required to perform air quality modeling to ensure that they are complying with the latest National Ambient Air Quality Standards (NAAQS) for sulfur dioxide (SO<sub>2</sub>), NO<sub>2</sub>, and PM<sub>2.5</sub>. The need to model will depend on the pollutant and certain factors about your facility, including whether the MPCA determines that modeling for your facility is needed to prepare Minnesota's State Implementation Plan (SIP). We intend to provide sufficient notice of our need for modeling so that you will be prepared to complete it.

Permits or permit amendments are sometimes delayed by the lack of documentation of modeled compliance. One possible source of delays in dispersion modeling is the lack of good emission factors. While good emission factors for SO<sub>2</sub> are readily available for most emission units, they are more difficult to find for many sources of NO<sub>2</sub> and PM<sub>2.5</sub>. The MPCA will require some facilities to perform stack tests for NO<sub>2</sub> and PM<sub>2.5</sub> to begin to collect the information needed to develop the emission factors that will be needed for modeling. Data from the stack tests will be reviewed by MPCA staff and then included in a database.

*NOTE: Past Air Regulatory and Technical Information updates are available [here](#).*

March 29, 2011

**Air Emission Inventory submittal deadline approaching for Option B, C, and D Registration Permits or Nonmetallic-Mineral Processing General Permits**

Facilities with an Option B, C, or D Registration Permit or a Non-Metallic Mineral Processing General Permit are required to submit their 2010 Air Emission Inventory (EI) by **April 1, 2011**.

If you are an owner or operator of a permitted air emissions facility, you must submit an annual air emission inventory as required by Minn. R. 7019.3000, Minn. Stat. § 116.091, subd. 1, and Minn. Stat. § 116.07, subd. 9. If your facility does not submit an air emission inventory on time, your facility may be subject to enforcement action which may include a monetary penalty. In addition, your next annual air fee will not be calculated using actual emissions, but rather using Minn. R. 7002.0025, subp. 3.

Emission Inventory Forms were mailed to your facility the end of December. If you have misplaced your forms please find blank forms on the [MPCA Emission Inventory website](#).

*NOTE: Past Air Regulatory and Technical Information updates are available [here](#) .*

## **Air Regulatory and Technical Information – Air Emission Inventory Electronic Reporting System Update**

February 25, 2011

Greetings,

We are pleased to announce that the MPCA recently launched the electronic reporting system for large facility air emission inventories. The 450 facilities holding large inventory-type permits can now submit their emission inventories electronically for the 2010 reporting year inventory. The 1500 or so facilities holding an Option B, C, or D registration permit or a nonmetallic general permit will submit their inventories electronically beginning with the 2011 inventory.

Electronic reporting is a key feature of the MPCA's new inventory system called [CEDR \(Consolidated Emissions Data Repository\)](#).

Webinar training for large facility representatives will be held March 1 from 9:00-10:30 am and March 3 from 1:30-3:00 pm. These training sessions will be recorded and made available on the [CEDR webpage](#). To participate in either of the Webinar trainings, follow the guidance below. Additional training sessions may be added.

*NOTE: Past Air Regulatory and Technical Information updates are available [here](#).*

Topic: Air Emissions Inventory Electronic Reporting Training

Date: Tuesday, March 1, 2011

Time: 9:00 am, Central Standard Time (Chicago, GMT-06:00)

Meeting Number: **591 527 170**

Meeting Password: **webex**

To join the online meeting (Now from mobile devices!)

1. Go to

<https://mpca.webex.com/mpca/j.php?ED=153335297&UID=0&PW=NZDEwZDIhOWVi&RT=MIM3>

2. If requested, enter your name and email address.

3. If a password is required, enter the meeting password: **webex**

4. Click "Join".

To view in other time zones or languages, please click the link:

<https://mpca.webex.com/mpca/j.php?ED=153335297&UID=0&PW=NZDEwZDIhOWVi&ORT=MIM3>

To join the teleconference only

Call-in toll-free number: **1-888-742-5095 (US)**

Show global numbers:

<https://www2.audiocontrols.net/WebExAdaptor/globalnumber?participantcode=6866845078&tollfreecc=1&tollfree=888-742-5095&tollnumbercc=1&tollnumber=>

Conference Code: **686 684 5078**

For assistance

1. Go to <https://mpca.webex.com/mpca/mc>

2. On the left navigation bar, click "Support".

OR you can contact MPCA Webex assistance at:

[dee.williams@state.mn.us](mailto:dee.williams@state.mn.us)

1-651-757-2634

To add this meeting to your calendar program (for example Microsoft Outlook), click this link:

<https://mpca.webex.com/mpca/j.php?ED=153335297&UID=0&ICS=MI&LD=1&RD=2&ST=1&SHA2=h8DK28ZgFMTVFG0D0IGCs4jTWCpAOW-B3kIMUc74bQ=&RT=MIM3>

The playback of UCF (Universal Communications Format) rich media files requires appropriate players. To view this type of rich media files in the meeting, please check whether you have the players installed on your computer by going to

<https://mpca.webex.com/mpca/systemdiagnosis.php>

<http://www.webex.com>

**IMPORTANT NOTICE:** This WebEx service includes a feature that allows audio and any documents and other materials exchanged or viewed during the session to be recorded. By joining this session, you automatically consent to such recordings. If you do not consent to the recording, discuss your concerns with the meeting host prior to the start of the recording or do not join the session. Please note that any such recordings may be subject to discovery in the event of litigation.



Topic: Air Emissions Inventory Electronic Reporting Training - Michael Smith

Date: Thursday, March 3, 2011

**Time: 1:00 pm**, Central Standard Time (Chicago, GMT-06:00)

**Meeting Number: 594 657 235**

**Meeting Password: CEDR**

To join the online meeting (Now from mobile devices!)

1. Go to

<https://mpca.webex.com/mpca/j.php?ED=154143142&UID=0&PW=NNjYxZWE0M2Vk&RT=MiM3>

2. If requested, enter your name and email address.

3. If a password is required, enter the meeting password: **CEDR**

4. Click "Join".

5. Follow the instructions that appear on your screen.

To view in other time zones or languages, please click the link:

<https://mpca.webex.com/mpca/j.php?ED=154143142&UID=0&PW=NNjYxZWE0M2Vk&ORT=MiM3>

To join the teleconference only

Call-in toll-free number: **1-888-742-5095** (US)

Show global numbers:

<https://www2.audiocontrols.net/WebExAdaptor/globalnumber?participantcode=6866845078&tollfreecc=1&tollfree=888-742-5095&tollnumbercc=1&tollnumber=>

Conference Code: **686 684 5078**

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[dee.williams@state.mn.us](mailto:dee.williams@state.mn.us)

1-651-757-2634

To update this meeting to your calendar program (for example Microsoft Outlook), click this link:

<https://mpca.webex.com/mpca/j.php?ED=154143142&UID=0&ICS=UMI&LD=1&RD=2&ST=1&SHA2=BUys17VV6UR/I24-3o8twC3YMTdlPQI9vHn9QX3BGIU=&RT=MiM3>

WebEx will automatically setup Meeting Manager for Windows the first time you join a meeting. To save time, you can setup prior to the meeting by clicking this link:

<https://mpca.webex.com/mpca/meetingcenter/mcsetup.php>

The playback of UCF (Universal Communications Format) rich media files requires appropriate players. To view this type of rich media files in the meeting, please check whether you have the players installed on your computer by going to

<https://mpca.webex.com/mpca/systemdiagnosis.php>

<http://www.webex.com>

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## Update on Electronic Emission Inventory Reporting Availability

### Electronic Reporting

As previously communicated, the 450 facilities with large inventory-type permits will submit their emission inventory electronically for the first time beginning with the 2010 reporting year inventory. The 1500 or so facilities holding an option B, C, or D registration permit or a nonmetallic general permit will submit their inventories electronically beginning with the 2011 inventory.

### Trial/ Testing System

In late December 2010, two facilities began early testing of the new system. A test system is expected to be available beginning January 24<sup>th</sup> for all authorized users of **large-type facilities only**. (Testing availability for registration and nonmetallic general permit holders will be announced at a later date.) This will be a test site for learning purposes only and not for official submittal of emissions data.

### Live System

Assuming no major issues are found during the trial period, the electronic reporting system is anticipated to be live and available for official submittal by large facilities beginning February 7<sup>th</sup>. Additional work on enhancements to the system will continue during 2011 following the first release. A new release will be available for submittal of the 2011 inventory next year.

Go to the [Consolidated Emissions Inventory Repository \(CEDR\) webpage](#) for more information.

*NOTE: Past articles (Air Mail Archives) are available [here](#) .*

## **MPCA Electronic Emission Inventory - Registration Requirements for Large Facilities**

An e-mail was sent in early December to facilities holding large inventory- type permits (all permit types except registration or non-metallic general permits). Large-inventory-type permit holders are required to create an account through MPCA Online Services and submit a User Agreement to the MPCA for reporting emissions generated in 2010. See contents of the e-mail below:

### Account Registration Information for MPCA Electronic Inventory

You are receiving this e-mail because you are listed as the contact for your facility's air emission inventory report. We are pleased to announce that because your facility holds a large inventory type permit, you will submit your 2010 Emission Inventory (EI) electronically. (Facilities holding registration B, C, D or nonmetallic general permits will submit their inventories electronically beginning with the 2011 inventory.)

If you are NOT the facility's air emission inventory contact, please forward this to the appropriate person and notify me so that we can update our records.

To be able to use the system, the *responsible official* for your facility, as defined in [Minn. R. 7007.0100, subp. 21](#) must sign up for an account through MPCA Online Services and submit a signed paper Emission Inventory Report (EIR) User Agreement to the MPCA. According to Minn. Rules, the responsible official is the only person that can submit the inventory, thus a signed paper agreement is needed to allow for electronic signature and submittal. Please allow up to 2-3 weeks to process this agreement given the volume of new users.

Others assisting with the preparation of the inventory, but are not the responsible official, can create an account at any time through <https://netweb.pca.state.mn.us/private/>, and follow steps 1-2 below. Users that are not the responsible official will be able to assist with preparing the emission inventory submittal; however, they will not have access to the facility information until access is granted by the responsible official (submitter).

The system is still under development. Account registration is the first step in gaining access to the system. We will provide more information about testing opportunities in the next few weeks.

Here are the steps for the [responsible official](#) to take. (You may not be your facility's responsible official. Please ensure that they are notified.)

1. Go to <https://netweb.pca.state.mn.us/private/>
2. Select "Create an Account" and complete the information requested. You will receive an e-mail with your account number. Click the link in the e-mail to activate your account.
3. Follow the instructions to log into the system.
4. Once you are logged in select "Air Emission Inventory Submittal" from the menu of options.
5. Select "Create Submitter Agreement."
6. Enter the 8-digit facility ID for the facilities for which you are the responsible official. This ID appears on your previous year's air emission inventory.

7. Select "Create Agreement."
8. Print out the Agreement, sign, and mail to the MPCA address listed.
9. You will be contacted by e-mail when you are authorized as the submitter for the facilities listed in the agreement and to grant access to others to prepare the inventory.

If you have questions, please e-mail [michael.smith@state.mn.us](mailto:michael.smith@state.mn.us) or call at 651-757-2733.

*NOTE: Past articles (Air Mail Archives) are available [here](#) .*

November 23, 2010

Greetings AQ Listserv Subscribers –  
One Listserv article today.

**NOTICE OF INTENT TO ADOPT RULES UNDER THE GOOD CAUSE EXEMPTION, MINNESOTA STATUTES SECTION 14.388, Subdivision 1, Clause 2.**

**Adopted Exempt Rules Relating to Air Quality Definitions and Abbreviations, *Minnesota Rules*, chapter 7005 and Permits and Offsets, *Minnesota Rules*, chapter 7007.**

**Introduction.** The Minnesota Pollution Control Agency (MPCA), Division of Environmental Analysis and Outcomes, intends to adopt rules under the good cause exemption rulemaking process in the Administrative Procedure Act, *Minnesota Statutes*, section 14.388, and the rules of the Office of Administrative Hearings, *Minnesota Rules*, part 1400.2400. This rule revision will incorporate new federal permit requirements for greenhouse gas (GHG) emissions.

Interested parties have five business days after the date of this notice to submit comment to the Office of Administrative Hearing. You may submit comment until 4:30 PM on December 6, 2010. The MPCA requests that any person submitting comment to the Office of Administrative Hearings also submit a copy of the comment to the MPCA's contact person.

**Contact Persons.** The Office of Administrative Hearings contact person is: Maria Lindstrom, Office of Administrative Hearings, P.O. Box 64620, St. Paul, MN 55164-0620, phone (651) 361-7841, FAX (651) 361-7936, and email [rulecomments@state.mn.us](mailto:rulecomments@state.mn.us).

The MPCA's contact person is Barbara Conti, MPCA, 520 Lafayette Road N., St. Paul, MN 55155-4194, phone (651) 757-2288, FAX: 651-297-8324, and email [barbara.conti@state.mn.us](mailto:barbara.conti@state.mn.us). TTY users may call the MPCA at 651-292-5332 or 800-657-3867.

**Subject of the Exempt Rules and Statutory Authority.** The proposed exempt rule is about amending *Minnesota Rules*, chapters 7005 and 7007, which govern how Minnesota implements portions of the federal Part 70 operating permit program and the federal New Source Review/Prevention of Significant Deterioration (NSR/PSD) pre-construction permitting program. The statutory authority to adopt the rules under the good cause exemption rulemaking process is *Minnesota Statute*, section 14.388, subdivision 1, clause 2.

The MPCA is proposing to revise its rules to incorporate any new federal GHG permit thresholds for GHGs as a regulated pollutant and to adopt a schedule for permit applications to be submitted. As an exempt rule, this rule will be in effect for a maximum of two years from the date of publication in the State Register. The MPCA is currently developing a permanent rule to replace this temporary rule. The permanent rule will be subject to the full rulemaking procedures under the Minnesota Administrative Procedures Act, which provides for public notice and participation.

**New Federal Requirements.** On May 13, 2010, the Environmental Protection Agency (EPA) issued a final rule to define GHG and to establish new permit thresholds for GHG emissions. This rule

affects two permit programs, these are: 1) the PSD program for construction permits; and 2) the Part 70 operating permit program, also called the Title V program.

The federal rule has several new definitions, including a definition of GHGs as an aggregate group of 6 gases. They are: Carbon dioxide; nitrous oxide; methane; hydrofluorocarbons; perfluorocarbons and sulfur hexafluoride. The proposed rule incorporates the federal definition.

The new Part 70 and PSD permit threshold for GHG emissions is a potential to emit (PTE) of 100,000 tons per year (tpy) of GHGs calculated as carbon dioxide equivalent (CO<sub>2</sub>-e). The new PSD significance level for modifications that result in an increase of GHG is 75,000 CO<sub>2</sub>-e.

Starting January 2, 2011, GHG permit requirements will apply to new or modifying PSD and Part 70 sources if they have GHG emissions above the thresholds. The new permit rules will apply to all facilities with emissions above the thresholds starting July 1, 2011.

Minnesota's part 70 permit rule refers to the Clean Air Act for applicability, which defines the major source threshold as 100 tpy. The current rule also specifically lists the permit threshold as 100 tpy. The existing rule language needs to be revised to conform to the new threshold in the federal rule. Additionally, requirements for registration permits, capped permits and insignificant activities need to be modified to ensure that they are permitted appropriately under the federal rules.

***Exempt Rulemaking Process.*** The MPCA plans to use the exempt rulemaking process provided in *Minnesota Statutes*, section 14.388, subdivision 1(2) to implement GHG permitting. The statute allows an expedited process if agencies need to comply with a requirement in federal law in a manner that does not allow for compliance with the usual rulemaking process. The exempt rulemaking process must be completed in 2010 to meet the effective date of the federal permit rule, January 2, 2011. The MPCA finds that it is impracticable and not in the public interest to adopt the proposed rules using the usual rulemaking process. If the amendments were to go through the usual rulemaking process, the rule would not be complete by the federal effective date and thousands of small sources in Minnesota would be subject to major source permitting. The cost to these small sources would be very high, particularly in light of the fact that eventually the new GHG threshold would nullify the requirements to obtain a major source permit. The MPCA would also be faced with the prospect of permitting small sources beginning January 2, 2011, only to re-permit them as minor sources or to void their permits entirely after the new GHG threshold becomes effective. It is contrary to the public interest to put small sources through unnecessary permitting and impracticable for the MPCA to face permitting sources twice.

A copy of the proposed rule is attached to this notice as mailed or emailed. In accordance with *Minnesota Statutes*, section 16E.07, the proposed exempt rule may also be viewed at: <http://www.pca.state.mn.us>, then click on the "regulations" tab at the top of the page.

**Comments.** You have until 4:30 PM on Monday, December 6, 2010, to submit comment to the Office of Administrative Hearings in support of or in opposition to the proposed good cause exempt rule, or to the legality of the proposed rule. Your comment must be in writing and received by the Office of Administrative Hearings contact person by the due date. Comment is encouraged. The MPCA requests that any person submitting written comment to the Office of Administrative Hearings' contact person also submit a copy of the comment to the MPCA's contact person.

**Alternative Format.** Upon request, the MPCA can make this Notice available in an alternative format, such as large print, Braille, or cassette tape. To make such a request, please contact the MPCA's contact person at the address or telephone number listed above.

**Lobbyist Registration.** *Minnesota Statutes*, chapter 10A, requires each lobbyist to register with the State Campaign Finance and Public Disclosure Board. You may direct questions regarding this requirement to the Campaign Finance and Public Disclosure Board at: Suite 190, Centennial Building, 658 Cedar Street, St. Paul, MN 55155, telephone (651) 296-5148 or 1-800-657-3889.

**Review and Adoption of Exempt Rules.** The rule and supporting documents have been submitted to the Office of Administrative Hearings for a review of its legality. The Administrative Law Judge has 14 days to approve or disapprove the rule. If the rule is approved the MPCA will adopt the rule and publish it in the *State Register*. The rule will take effect on the date the rule is published in the *State Register*.

If the Administrative Law Judge disapproves the rule, the MPCA has the option to resubmit the rule with any necessary changes. If the rule is resubmitted the corrected rule will be reviewed and approved or disapproved within five working days. The MPCA also has the option of challenging a disapproval to the Chief Administrative Law Judge within five working days of receiving the disapproval. If the MPCA ask for a review, the MPCA will send you a notice of its requests. The Chief Administrative Law Judge will then have 14 days to make a decision to either approve or disapprove the rule. If the rule is approved after a disapproval, the MPCA will adopt the rule and publish it in the *State Register*. The rule will take effect on the date the rule is published in the *State Register*.

If you want to receive a copy of the adopted rule, or want to register with the MPCA to receive notice of future rule proceedings, submit your request to the MPCA's contact person listed above.

*NOTE: Past articles (Air Mail Archives) are available [here](#) .*



November 10, 2010

Greetings AQ Listserv Subscribers –  
One Listserv article today.

### **1. Changes coming to the 2010 Air Emissions Inventory submittal**

The MPCA is pleased to inform you that **large** inventory type facilities (all facilities that do not have a registration or nonmetallic general permit) will be able to submit their 2010 Emission Inventory (EI) electronically. This effort is part of the Consolidated Emissions Data Repository (CEDR) project.

Facilities will be notified electronically via this listserv of opportunities to test the new electronic data entry/reporting system.

#### **Tentative Timeline for Electronic EI Submittal**

##### **Late November-December 2010**

- Facilities sign up to become an authorized system user.

##### **December 2010**

- Testing of e-reporting system becomes available for large inventory type facilities.

##### **January- March 2011**

- Webinar training is offered to facilities.
- Large inventory type facilities submit their inventories electronically.
- Registration and nonmetallic general permit holders submit paper inventories (no changes).
- Testing of electronic submittal system by registration and nonmetallic general permit holders.

##### **January 2012**

- All reporting facilities are able to report their criteria, toxics, and greenhouse gas (GHG)\* emissions electronically.

\*Facilities that are required to report GHG emissions to US EPA under 40 CFR Part 98 are not required to report GHG to the MPCA.

For more information, please contact Michael Smith, 651-757-2733 or Michael.Smith@state.mn.us. You can also visit the [CEDR Web page](#).

*NOTE: Past articles (Air Mail Archives) are available [here](#).*

August 19, 2010

Greetings AQ Listserv Subscribers –  
One Listserv article today.

1) Initial Notification of Area Source Engines (40 CFR Pt. 63, Subp. ZZZZ) due **August 31, 2010**

The initial notification for sources subject to the “area source” provisions of the National Emissions Standard for Hazardous Air Pollutants (NESHAPs) for Reciprocating Internal Combustion Engines (RICE) found in 40 CFR Pt. 63, Subp. ZZZZ, is due August 31, 2010.

An area source for Hazardous Air Pollutants (potential emissions of HAPs are less than major source thresholds), which has a RICE that is an affected source must send the notification required by 40 CFR § 63.6645 to Region V of the Environmental Protection Agency (EPA). The MPCA has not accepted delegation of this standard.

The notification form can be found under “Implementation Information” on EPA’s Web site. The site also contains a flowchart that helps to identify affected units subject to the notification requirements.

The Web site can be found at: <http://www.epa.gov/ttn/atw/rice/ricepg.html>

*NOTE: Past articles are available at:* <http://www.pca.state.mn.us/index.php/air/air-permits-and-rules/air-permits-and-forms/guidance-and-information/air-related-technical-information-updates.html?menuid=&missing=0&redirect=1>

July 28, 2010

Greetings AQ Listserv Subscribers -

Two Listserv article today.

1) Transport Rule

Environmental Protection Agency (EPA) has recently released a proposed Transport Rule, to deal with interstate transport of pollutants that contribute to non-attainment of the National Ambient Air Quality Standard (NAAQS) for ozone and fine particulate matter. When finalized, the Transport Rule will replace the Clean Air Interstate Rule (CAIR). Although application of CAIR was stayed in Minnesota, Minnesota is included in the proposed Transport Rule.

Like CAIR, the Transport Rule is a cap-and-trade program covering emissions of NOX and SO2 from power plants. Covered power plants receive from EPA an allocation of allowances to cover their NOX and SO2 emissions, and must hold one allowance for each ton of emissions. EPA expects that the proposed rule and information on public hearings will be published in the Federal Register on August 2; upon publication, a 60 day comment period will begin. For more information, visit EPA's web page on the Transport Rule <http://www.epa.gov/airquality/transport/index.html>. Covered sources are encouraged to check the proposed allocations under the Technical Information section of EPA's website.

2) New SO2 National Ambient Air Quality Standard

On June 22, 2010, EPA promulgated a new NAAQS for SO2. The new one-hour standard is set at 75 parts per billion (ppb). This is an 85% decrease from Minnesota's current one-hour standard. Unless litigation causes a delay, the standard will be effective on August 23, 2010. If you have already submitted or soon plan to submit a permit application and your facility is required to conduct an ambient air quality analysis, bear in mind that EPA's past practice has been to require modeling that demonstrates compliance with the new standard if the standard becomes effective before permit issuance. The MPCA applies the same practice to facilities subject to an Environmental Assessment Worksheet.

EPA is using a hybrid monitoring and modeling approach to implement the new SO2 NAAQS. For this reason, the MPCA encourages sources emitting over 100 tons per year of SO2 to model their SO2 emissions. This will help sources determine if new permit limits will be needed to ensure attainment with the new NAAQS. Other sources that could cause or contribute to a NAAQS violation, such as those in an existing SO2 maintenance area included in the State Implementation Plan, should also consider modeling their SO2 emissions. EPA intends to develop new modeling guidance, with drafts available in late 2010 and final guidance in early 2011. Until that guidance is available, we recommend using existing MPCA modeling guidance and protocols.

The MPCA will not be reviewing modeling protocols at this time. Rather, this recommendation is intended to encourage proactive work and facilitate internal corporate planning. The MPCA is tracking EPA's guidance on implementation and developing internal policies but is not currently requiring modeling submittals. The MPCA also urges sources to be mindful of multi-pollutant

and multimedia considerations, including the new one hour nitrogen dioxide NAAQS and upcoming permitting requirements for greenhouse gases.

For more information, please visit MPCA's SO<sub>2</sub> State Implementation Plan page at <http://www.pca.state.mn.us/index.php/air/air-quality-and-pollutants/general-air-quality/state-implementation-plan/state-implementation-plan-for-so2.html> and EPA's SO<sub>2</sub> NAAQS Revision page at <http://www.epa.gov/air/sulfurdioxide/actions.html>

*NOTE: Past articles are available at:* <http://www.pca.state.mn.us/index.php/air/air-permits-and-rules/air-permits-and-forms/guidance-and-information/air-related-technical-information-updates.html?menuid=&missing=0&redirect=1>

May 19, 2010

Greetings Subscribers –

3 Articles today:

1. 2011 Air Monitoring Network Plan
2. Performance/Stack Testing Update: Electronic Submittal Has Arrived!
3. Other Paper Reduction Strategies

#### 1. 2011 Air Monitoring Network Plan

The Minnesota Pollution Control Agency (MPCA) has released the 2011 *Air Monitoring Network Plan* for public review and comment from May 19, 2010 through June 18, 2010. The annual report provides an overview of the various air quality monitoring networks currently operating in Minnesota. Data for several pollutants are summarized to show current conditions relative to State and Federal air quality standards. Details regarding the location of individual sites, monitoring objectives, and proposed changes are provided.

Instructions for submitting comments and the draft plan can be found at [www.pca.state.mn.us/air/monitoringnetwork.html](http://www.pca.state.mn.us/air/monitoringnetwork.html). For more information please call Rick Strassman, MPCA Air Monitoring Unit Supervisor at 651-757-2760.

#### 2. Performance/Stack Testing Update: Electronic Submittal Has Arrived!

The MPCA's stack testing & monitoring program has recently changed its report submittal policy to allow for the receipt of performance test reports electronically. We changed this policy to ease the process of submitting test reports in light of advancements in technology and to reduce paper consumption. Available soon you will find the electronic submittals guidance document which lists three approved methods for submitting test reports electronically at <http://www.pca.state.mn.us/index.php/air/air-monitoring-and-reporting/air-emissions-and-monitoring/performance-testing-for-stationary-source-emissions/performance-testing-for-stationary-source-emissions.html>. It is important to note that each method has specific requirements, and we expect these requirements to be followed as part of providing a complete submission. The list below contains several points worth mentioning:

- Submissions **must** be sent to: [submitstacktest@state.mn.us](mailto:submitstacktest@state.mn.us) (*not the individual in charge of the test*)
- For questions or concerns, contact the person who approved your test plan (*not [submitstacktest@state.mn.us](mailto:submitstacktest@state.mn.us)*)

- Electronic submittal policy **only applies to** performance **test reports** (*emissions tests, monitor initial & re-certifications*)
  - Examples of what may not be submitted electronically: Excess Emissions Reports, DRF-2, DRF-1, CR-04 forms
- To assist with processing your report, please include the test date and emission unit number of the unit tested (*not required, but appreciated*)

We hope you will consider this new format when submitting test reports. We acknowledge that there may be bumps along the way as we institute and monitor this new policy. As long as you are proactive and follow the requirements listed in the attached policy guidance, we are confident this will progress smoothly.

### 3. Other Paper Reduction Strategies:

- Please print double sided whenever possible. This will reduce paper consumption and save limited filing space.
  - Examples: performance test reports, certification reports, excess emission reports, data readouts, etc.
- Routine RATA submittals need only include the RATA results summary, monitors (MR00X), pollutant(s) tested and audit date which should be submitted along with the DRF-1 and other quarterly report documents at the end of the quarter completed.
- DAS or other data recording system readouts in support of information provided on the DRF-1 need not be included unless specifically required by permit condition or another air rule requirement.

*If necessary, the MPCA will request a full report or supporting data readouts*

**NOTE:** Past articles are available at: <http://www.pca.state.mn.us/air/air-techinfo.html>

May 11, 2010

Greetings Subscribers –

The Minnesota Pollution Control Agency has redesigned its Web site. You will still access the new “Home” page at [www.pca.state.mn.us](http://www.pca.state.mn.us). If you have bookmarked pages on it, you may need to reset them.

We’re excited about the changes. The site’s new design provides more integrated content and simplified navigation. We are continuing to work on improved searchability of the site. You will also see a new look for the site.

We encourage your feedback and suggestions.

Take a look. You can send your comments to [webteam.pca@state.mn.us](mailto:webteam.pca@state.mn.us)

***NOTE: Past articles are available at:*** <http://www.pca.state.mn.us/air/air-techinfo.html>

March 15, 2010

Greetings AQ Listserv Subscribers –

One Listserv article today.

1. 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE)

The March 3, 2010, Federal Register contains a notice of a final rulemaking amending portions of 40 CFR Part 63, Subpart ZZZZ - National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE). This action promulgates NESHAP for existing stationary Compression Ignition (CI) RICE with a site rating of less than or equal to 500 horsepower (HP) located at major sources, existing non-emergency CI engines with a site rating greater than 500 HP at major sources, and existing stationary CI RICE of any power rating located at area sources. EPA is finalizing these standards to meet its statutory obligation to address HAP emissions from these sources under sections 112(d), 112(c)(3) and 112(k) of the Clean Air Act.

RICE standard: <http://www.epa.gov/ttn/atw/rice/ricepg.html>

RICE Factsheet:

[http://www.epa.gov/ttn/oarpg/t3/fact\\_sheets/rice\\_neshap\\_fs\\_021710.pdf](http://www.epa.gov/ttn/oarpg/t3/fact_sheets/rice_neshap_fs_021710.pdf)



March 8, 2010

Greetings AQ Listserv Subscribers –

One Listserv article today.

1. New Air and Water Fees Rules are Final

The notice for adoption of the new rules for Air and Water Permit Fees has been published in the State Register on March 8, 2010. The link to the publication is [http://www.comm.media.state.mn.us/bookstore/stateregister/34\\_36.pdf](http://www.comm.media.state.mn.us/bookstore/stateregister/34_36.pdf). The rules will be effective on March 15, 2010. This means that applications received by MPCA on or after this date should include the appropriate application fee. The amount for the air quality permit application fee can be determined using the new application form, SCP-01, available on the Forms page <http://www.pca.state.mn.us/air/permits/forms.html>. For more information on the rules, go to the MPCA's [Air and Water Permit Fees](#) Web page. We hope to get a final version of the rules posted on the web page soon. If you have any questions on the new rules, you may contact Paula Connell, at 651-757-2285 or at [paula.connell@state.mn.us](mailto:paula.connell@state.mn.us).

*NOTE: Past articles are available at:* <http://www.pca.state.mn.us/air/air-techinfo.html>

February 10, 2010

Greetings AQ Listserv Subscribers –

One Listserv article today.

#### USEPA Training for the Greenhouse Gas Mandatory Reporting Rule – Chicago

The U.S. Environmental Protection Agency (USEPA) will be sponsoring a free, on-site half-day training session on the National Greenhouse Gas Mandatory Reporting Rule (MRR) in Chicago, Illinois on March 25, 2010. The training will focus on the MRR's subpart A - general provisions, subpart C - stationary fuel combustion, subpart D - electricity generation, and subpart HH - municipal landfills. The training location is the Crowne Plaza Chicago O'Hare Hotel, located at 5440 North River Road, Rosemont, Illinois, one-and-a-half miles from O'Hare airport. The training session will run from 8:30 am until 12:45 pm. The training is free but registration is required. Attendees must register on-line by March 15, 2010, at <http://www.epa.gov/climatechange/emissions/training.html>

October 19, 2009

Greetings AQ Listserv Subscribers -

One Listserv article today.

#### 1. MPCA Seeks Comment on 2010 Source-oriented Lead Monitoring Proposal

On October 18, 2008, the Environmental Protection Agency (EPA) revised the National Ambient Air Quality Standard for lead. In addition to a ten-fold tightening of the standard, the EPA announced an expanded lead monitoring network, including both population and source-oriented monitoring. The 2010 Source-oriented Lead Monitoring Plan for Minnesota is now available for public comment through November 12, 2009. Included in this report is a description of how the Minnesota Pollution Control Agency identified facilities potentially requiring monitoring, air dispersion modeling procedures and results, and where required, proposed locations for source-oriented lead monitoring. The plan and instructions on how to comment can be found at: <http://www.pca.state.mn.us/air/monitoringnetwork.html>

**NOTE:** Past articles are available at: <http://www.pca.state.mn.us/air/air-techinfo.html>

October 7, 2009

Greetings AQ Listserv Subscribers -

One article today.

## 1. Final Rule on Mandatory Reporting of Greenhouse Gases

The final rule on Mandatory Reporting of Greenhouse Gases (GHGs) was signed by the EPA Administrator on September 22, 2009. Under the rule, suppliers of fossil fuels or industrial GHGs, manufacturers of vehicles and engines and facilities that emit 25,000 metric tons (MT) of GHGs or more are required to submit annual emission reports to EPA. The gases covered by the rule are carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>) and other fluorinated gases including nitrogen trifluoride (NF<sub>3</sub>) and hydrofluorinated ethers (HFEs). The first annual reports for the large facilities, covering calendar year 2010, must be submitted to EPA in March of 2011. The 2011 report should be based on process tracking that may need to start as early as January 2010. Vehicle and engine manufactures (outside of light-duty sector) will start GHG reporting with model year 2011. This federal rule does not change any conditions in air quality permits issued by the Minnesota Pollution Control Agency.

EPA has developed a number of tools and documents to assist reporters in understanding and complying with the rule. Resources include information sheets, checklists and technical support documents for individual source categories. More information about resources can be found at:

<http://www.epa.gov/climatechange/emissions/resources-tools.html>

EPA has also designed an Applicability Tool. The Applicability Tool is an application designed to help facilities assess whether the rule applies to them. The Applicability Tool is available at: <http://www.epa.gov/climatechange/emissions/GHG-calculator/index.html>

EPA will also host a number of web-based and in-person training sessions for people involved with reporting under Mandatory Reporting of GHGs Rule. For more information and training schedules please visit:

<http://www.epa.gov/climatechange/emissions/training.html>

For more information on the new reporting system and reporting requirements please visit:

<http://www.epa.gov/climatechange/emissions/ghgrulemaking.html>

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*NOTE: Past articles are available at:* <http://www.pca.state.mn.us/air/air-techinfo.html>

September 23, 2009

AQ Listserv Subscribers -

It has been brought to our attention that the email address in the September 23 article, "Redesign of the Air Emissions Inventory is Underway," for Nate Edel is not correct.

Instead of nate.edel@pca.state.mn.us it should be nathaniel.edel@pca.state.mn.us .

Apologies for the inconvenience. Thank you to those who notified us of this error.

September 23, 2009

Greetings AQ Listserv Subscribers -

One Listserv article today.

1. Redesign of the Air Emissions Inventory is Underway

The Minnesota Pollution Control Agency (MPCA) is beginning development of a new air emissions inventory system called the Consolidated Emissions Data Repository (CEDR). The new system will consolidate the air toxics, criteria, and greenhouse gas inventories into one database. It will also feature web-based electronic reporting for facilities. The MPCA plans to host several sessions this fall to receive input from external users to learn what their needs are from the new system. Please contact Nate Edel at [nate.edel@state.mn.us](mailto:nate.edel@state.mn.us) or 651-757-2332, if you would like to receive an e-mail containing the input session dates once they are established. To learn more about CEDR, please visit [www.pca.state.mn.us/air/cedr.html](http://www.pca.state.mn.us/air/cedr.html)

**NOTE: Past articles are available at:** <http://www.pca.state.mn.us/air/air-techinfo.html>

September 16, 2009

Hello AQ Listserv Subscribers -

One Listserv item -

#### Process Change for Title V Air Emission Reissuance Application Forms

In the past, MPCA mailed the Title V Reissuance application package to permittees 9 months before the permit expires. As a process improvement measure, the decision was made to change this process. In August 2009, letters were sent to all Title V permit holders informing them that the reissuance application forms are now available on the MPCA web page; and they will need to request facility-specific information via email.

Instructions, forms, and email address for requesting the facility-specific information are available at:

<http://www.pca.state.mn.us/air/permits/forms.html#11>

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mnair-tech-info mailing list

mnair-tech-info@lists.state.mn.us

<https://webmail.mnet.state.mn.us/mailman/listinfo/mnair-tech-info>



July 23, 2009

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Change in Default Thresholds for AERAs
2. Mercury Emissions Rule

1. Change in Default Thresholds for Air Emission Risk Analysis (AERAs):

The MPCA has changed the default thresholds for conducting AERAs to coincide with environmental review thresholds. Proposals going through the environmental review process because a project meets thresholds identified in Minn. R. 4410.4300, subp.15 or Minn. R. 4410.4400 and the project increases air emissions of a single criteria pollutant by 250

tons per year or more need to conduct an AERA. However, the MPCA will continue to use its discretion in requesting proposers to conduct an AERA for projects outside of this default - these cases generally encompass existing air emission sources that are the source of significant public interest or the specifics of a new facility or existing facility expansion indicate a need for further analysis prior to public notice. Some of the factors that may be considered in evaluating the need for an AERA include the location of the facility, the types of receptors nearby and their distance from the facility, the type of facility and/or change, and the amount and types of emissions

from the facility. If you have questions or comments, please contact Shelley Burman at 651 757 2255 or [shelley.burman@state.mn.us](mailto:shelley.burman@state.mn.us) or Steve Pak at 651 757 2633 or [steven.pak@state.mn.us](mailto:steven.pak@state.mn.us).

2. Mercury Emissions Rule

The Minnesota Pollution Control Agency (MPCA) is planning to promulgate new rules governing the reduction and reporting of mercury emissions. The rulemaking falls into the following two general categories:

1. Mercury Emissions Reporting - This portion of the rule will establish a schedule and methods for facilities to track and report their mercury air emissions to the MPCA.
2. Plans for Mercury Emissions Reductions at Certain Facilities - This portion of the rule will require certain mercury-emitting facilities holding an MPCA air emissions permit to develop their own mercury emissions reduction plan (Plan) for incorporation into their state permit. Certain facilities will be expected to

develop reduction plans to meet sector or source reduction targets and timeframes listed in the "Strategy Framework for the Implementation of Minnesota's Statewide TMDL" which can be found at <http://www.pca.state.mn.us/air/mercury-reductionplan.html>.

The MPCA will be publishing a "Request for Comments Notice" (Notice) in the July 27, 2009 publication of the State Register. The Notice will also be available on the MPCA's Public Notice Web site on July 27, 2009. If you have questions or comments, please direct them to: Barbara Conti at the MPCA, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194, Phone: 651-757-2288 or by email: [barbara.conti@state.mn.us](mailto:barbara.conti@state.mn.us).

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mnair-tech-info mailing list

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<https://webmail.mnet.state.mn.us/mailman/listinfo/mnair-tech-info>

July 14, 2009

Greetings Air Quality Technical Information subscribers -

#### New CH-16 Applicability Determination Request Form

The MPCA staff has developed a new form CH-16 for submitting requests for air quality permitting applicability determinations. The new form is now available and can be found on the MPCA's website at

<http://www.pca.state.mn.us/publications/forms/aq-f2-ch16.doc>.

It is ultimately the responsibility of facility owners and operators to be aware of and comply with all federal and state air quality requirements; however, the MPCA understands that there are times when it is difficult to know whether an air quality requirement applies or how to interpret a requirement that does apply. While MPCA staff may provide assistance and guidance over the phone or in person, a written request for an applicability determination is the best and sometimes the only way to obtain the MPCA's official position on the applicability and interpretation of air quality statutes, rules, policies, and permit conditions. Please use the new form when seeking an official determination of applicability from the MPCA.

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mnair-tech-info mailing list

mnair-tech-info@lists.state.mn.us

<https://webmail.mnet.state.mn.us/mailman/listinfo/mnair-tech-info>

June 22, 2009

Greetings Air Quality Technical Information subscribers -

#### 1. Proposed Air and Water Permit Fees Rules

Proposed Air and Water Permit Fees rules are now on public notice. The proposed rules, public notice, and rule statement of need and reasonableness (SONAR) are available on the MPCA Web page at [www.pca.state.mn.us/permits/airwaterfees.html](http://www.pca.state.mn.us/permits/airwaterfees.html). Information on how to submit comments on the proposed rules is contained in the public notice. Those without internet access may request a hard copy of the proposed rules, public notice, or SONAR by calling 651-757-2090. The public hearing date is set for July 28, 2009.

May 19, 2009

Greetings Air Quality Technical Information subscribers -

One Listserv items for today:

**EPA Proposes to Stay Effectiveness of CAIR for Minnesota (May 12, 2009)**

EPA issued a proposed rule staying the effectiveness of the Clean Air Interstate Rule (CAIR) and the CAIR Federal Implementation Plan for sources in the state of Minnesota.

EPA is proposing to stay CAIR while it conducts notice-and-comment rulemaking addressing this issue and whether Minnesota should be part of CAIR. Comments are due by June 11, 2009. For further information: 74 *Federal Register* 22147 and

<http://www.epa.gov/air/interstateairquality/rule.html#may09> and

<http://www.epa.gov/air/interstateairquality/rule.html#may>

May 12, 2009

Greetings Air Quality Technical Information subscribers -

4 Listserv items for today:

1. Air Monitoring Network Plan
2. Cumulative Air Risk Analysis Guidance Is Now Available
3. Updated Multi-pathway Screening Factors Used in an Air Emissions Risk Analysis
4. MPCA's Air Emissions Risk Analysis process introduces a new spreadsheet for analyzing emissions

#### 1. Air Monitoring Network Plan - Open for 30-day Public Comment

The MPCA has released Minnesota's 2010 Air Monitoring Network Plan for public review and comment from May 13, 2009 through June 12, 2009. The annual report provides an overview of the various air quality monitoring networks currently operating in Minnesota. Data for several pollutants are summarized to show current conditions relative to state and federal air quality standards. Details on the location of individual sites, monitoring objectives and proposed changes are provided. This year the plan also contains two additional features. A detailed plan for Minnesota's National Core Multi-pollutant (NCORE) monitoring station is attached and, in response to the 2008 Lead NAAQS revision, a source-oriented lead monitoring plan is included.

The purpose of this report is to demonstrate compliance with federal air monitoring network regulations, to describe proposed changes for the upcoming year, and to provide specific information on each of the existing and proposed monitoring sites. Instructions for submitting comments and the draft plan can be found at **[www.pca.state.mn.us/air/monitoringnetwork.html](http://www.pca.state.mn.us/air/monitoringnetwork.html)**. For more information please call Rick Strassman, MPCA Air Monitoring Unit Supervisor at 651-757-2760.

#### 2. Cumulative Air Risk Analysis Guidance Is Now Available

The MPCA is required to assess cumulative potential human health risks within the context of an Environmental Assessment Worksheet, a scoping Environmental Assessment worksheet for completion of an Environmental Impact Statement and in certain contexts outside of environmental review. To provide clear guidance for these analyses the MPCA risk assessment staff have drafted the following two documents: "Cumulative Air Emissions Risk Analysis at the Minnesota Pollution Control Agency: Background Document" and the "Cumulative How To Document."

The following information is described in these documents: the MPCA regulatory authority to require these analyses, under which circumstances a proposer would be required to conduct these analyses and how to conduct these analyses. Please submit questions or comments concerning these documents to the risk assessment staff at the MPCA.

Mary Dymond (651) 757-2327, [mary.dymond@pca.state.mn.us](mailto:mary.dymond@pca.state.mn.us)

Kristie Ellickson (651) 757-2336, [Kristie.ellickson@pca.state.mn.us](mailto:Kristie.ellickson@pca.state.mn.us)

Heather Magee-Hill (651) 757-2545, [Heather.Magee-Hill@state.mn.us](mailto:Heather.Magee-Hill@state.mn.us)

Vanessa Niemi (651) 757-2615, [Vanessa.niemi@pca.state.mn.us](mailto:Vanessa.niemi@pca.state.mn.us)

### 3. Updated Multi-pathway Screening Factors Used in an Air Emissions Risk Analysis

Multi-pathway Screening Factors are used in the Air Emissions Risk Analysis process when facilities emit persistent, bioaccumulative and toxic chemicals.

The MPCA has updated the toxicity values and Multi-Pathway Screening Factors (MPSF) in the Risk Assessment Spreadsheet (RASS) and Q/CHI spreadsheet ([www.pca.state.mn.us/air/aera-risk.html](http://www.pca.state.mn.us/air/aera-risk.html)). The 315 air toxic pollutants in the RASS were evaluated using the EPA's PBT profiler (<http://www.pbtprofiler.net/>). The resultant MPSF's are in the updated RASS (MPCA 2009) and further details as to their derivation can be found in the March 2009 publication of the *Journal of Air and Waste Management* (Pratt and Dymond, 2009) at ([www.pca.state.mn.us/air/aera-multimedia.html](http://www.pca.state.mn.us/air/aera-multimedia.html)). Please contact Greg Pratt at (651) 757-2655 [greg.pratt@pca.state.mn.us](mailto:greg.pratt@pca.state.mn.us) or Mary Dymond at (651) 757-2327 [mary.dymond@pca.state.mn.us](mailto:mary.dymond@pca.state.mn.us) with questions about the Multi-pathway Screening Factors.

### 4. MPCA's Air Emissions Risk Analysis process introduces a new spreadsheet for analyzing emissions

The Q/CHI spreadsheet is intended for users who are in the process of completing an Air Emissions Risk Analysis (AERA) or some other type of air risk analysis.

The MPCA risk assessment staff have developed a new spreadsheet called the Q/CHI spreadsheet. The "Q/CHI" spreadsheet is an air/risk dispersion analysis that refines risk estimates, resulting in risks that are based on air concentrations paired in time and space. In the MPCA screening-level RASS, air concentrations and resulting risks do not reflect this level of refinement. The Q/CHI spreadsheet is intended to be used iteratively with the RASS to refine risks and reduce resources when completing and AERA or other air risk analysis.

Additional information on the Q/CHI spreadsheet can be found at [www.pca.state.mn.us/air/aera-risk.html](http://www.pca.state.mn.us/air/aera-risk.html)

For any questions or comments related to these updates and the new Q/CHI spreadsheet please contact one of the MPCA risk assessment staff.

Mary Dymond (651) 757-2327, [mary.dymond@pca.state.mn.us](mailto:mary.dymond@pca.state.mn.us)

Kristie Ellickson (651) 757-2336, [kristie.ellickson@pca.state.mn.us](mailto:kristie.ellickson@pca.state.mn.us)

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April 21, 2009

Greetings Air Quality Technical Information subscribers -  
2 Listserv items for today:

1. Standardized Air Modeling (SAM) Spreadsheets for regulatory air modeling
2. Change in 2008 high global warming potential gas purchase/manufacturer reporting date to September 1, 2009

1. What's New on Air Dispersion Modeling Webpage? Standardized Air Modeling (SAM) spreadsheets for regulatory air modeling.

These spreadsheets are works-in-progress. Their use is optional but recommended. We expect they will change/improve over time and we appreciate your patience as we move forward. The 5-digit version numbers resemble EPA model version numbers (i.e. 2-digit year id and 3-digit Julian date; "09097" is April 7, 2009). Please direct any questions to Dennis Becker at 651-757-2217 or [dennis.becker@state.mn.us](mailto:dennis.becker@state.mn.us).

- Standardized Air Modeling (SAM) Spreadsheet (SAM09097.xls)
- Standardized Mobile Source (SMS) Spreadsheet (SMS09097.xls)
- Standardized Data Visualization (SDV) Spreadsheet (SDV09097.xls)

Standardized Air Modeling (SAM) Goals:

- Better communicate air dispersion modeling information to all persons
- Better communicate agency expectations to air permit applicants and consultants
- Standardize and streamline our review of air dispersion modeling submittals
- Protocols, results, revisions, modeling-related permit conditions, etc.
- Identify/fix the most common mistakes (e.g. math errors, missing sources, etc.)
- Identify/fix the most time consuming modeling steps (e.g. fugitive emissions)
- Use less paper

The SAM spreadsheets now are available at:

<http://www.pca.state.mn.us/air/modeling.html#new>

2. Change in 2008 high global warming potential gas purchase/manufacturer reporting date to September 1, 2009

The Minnesota Pollution Control Agency (MPCA) initially set April 1, 2009, as the deadline for reporting the 2008 purchase or manufacture of high-GWP gases. The high-

GWP reporting statute (Minn. Stat. §216H.11) is currently under review by the Minnesota Legislature. The potential Legislative changes may affect the reporting requirements including the reporting threshold and the nature of the reports (emission v. purchases). For this reason, the MPCA has changed the 2008 purchase/manufacture reporting date from April 1, 2009, to September 1, 2009. The 2008 reporting forms will be posted within the next few weeks. Please watch for further updates via our listserv or the MPCA website. For additional information, please contact Jim Sullivan at (651) 757-2769 or Barbara Jean Conti at (651) 757-2288.

January 23, 2009

Greetings Air Quality Technical Information subscribers -

Four Listserv items for today:

1. Biomass Material as a Fuel Source
2. EPA Promulgated a Final Rule Regarding Fugitive Emissions
3. How is MPCA Regulating Particulate Matter Less than 2.5 Micrometers (PM<sub>2.5</sub>) in Air Quality Permits?
4. Clean Air Interstate Rule Update

#### 1. Biomass Material as a Fuel Source

Are you interested in utilizing a biomass material as a fuel source? Check out the MPCA webpage, <http://www.pca.state.mn.us/energy/fuels/biomass-facilities.html>. Here you will find a link to a report titled Emission Factors for Priority Biofuels in Minnesota; you may be able to find emission factor data for the biomass fuel you are interested in. Also check out the document titled Solid Waste and Air Quality Permitting Requirements for By-Product and Biomass Material in a Combustion Process. Another useful link is to check one of our past Listserv items, located at <http://www.pca.state.mn.us/air/air-techinfo.html> (see item dated 11/29/06), for a reminder that most fuel changes will require a major permit amendment, even to do a test burn.

If you have a question about utilizing biomass and what rules may apply or what type of permit action may be necessary, you may contact Bruce Braaten at 507-281-7762 or at [bruce.braaten@pca.state.mn.us](mailto:bruce.braaten@pca.state.mn.us).

#### 2. EPA Promulgated a Final Rule Regarding Fugitive Emissions

On December 19, 2008 the U.S. Environmental Protection Agency (EPA) promulgated a final rule regarding fugitive emissions. On January 20, 2009, the rule becomes effective in Minnesota. These rule changes primarily affect the applicability determinations for stationary sources that are not listed in 40 CFR 52.21(b)(1)(iii). For such sources, fugitive emissions will not be considered when determining if the facility is a major source or when determining if a major modification will occur at an existing major source. Listed sources must continue to include fugitive emissions when determining their major source status or when determining whether they are making a major modification to their existing major source. The preamble to the rule also includes EPA's guiding principles for determining fugitive emissions.

The changes to the rule do not affect the provisions of New Source Review's Plantwide Applicability Limits (PALs); fugitive emissions must be included in PALs.

Sources of fugitive emissions will continue to be subject to a Best Available Control Technology (BACT) analysis and modeling requirements at any facilities that trigger the requirements of New Source Review for the fugitive pollutant.

### 3. How is MPCA Regulating Particulate Matter Less than 2.5 Micrometers (PM<sub>2.5</sub>) in Air Quality Permits?

Information on PM<sub>2.5</sub> emissions must now be included in all total facility permit applications (state\* and Part 70) and permit amendment applications. The MPCA will be requesting that facilities amend total facility permit applications already submitted that do not contain information on PM<sub>2.5</sub> regardless of when the application was submitted. The MPCA may also request updates to permit amendment applications already submitted. For example, permit amendment applications that are incorporated into a reissued total facility permit may need to be updated to include PM<sub>2.5</sub>. Exceptions may be made by the MPCA on a case-by-case basis. More information is available at:

<http://www.pca.state.mn.us/air/permits/pm25.html>

\*PM<sub>2.5</sub> emissions are not required in Registration Permit Applications, Capped Permit Applications, and Nonmetallic Mineral Processing General Permit Applications.

### 4. Clean Air Interstate Rule Update

On January 15, 2009, the United States Environmental Protection Agency (USEPA) Administrator signed the notice for a proposed rule to stay the effectiveness of the Clean Air Interstate Rule (CAIR) and associated Federal Implementation Plan for the state of Minnesota. Publication of this proposed rule in the Federal register is on hold until staff in President Obama's Administration reviews and approves it. The stay is in response to decisions by DC Circuit Court of Appeals issued in July and December of 2008. The Court determined, among other issues, that EPA did not adequately address possible errors in the analysis that led to the conclusion that Minnesota should be included in the CAIR region. The court remanded CAIR to EPA to revise the rule by addressing the flaws identified in the July 2008 ruling. The proposed stay includes language regarding the management of recorded allowance allocations under the annual NOX trading program. For further information on this proposed rule, please visit: [epa.gov/cair/rule.html#jan09](http://epa.gov/cair/rule.html#jan09).

Note that after publication, the public participation and rule promulgation proceedings could take a few months. Until that time, CAIR is officially in effect

in Minnesota. The MPCA will not go as far as to review CAIR permit applications and issue CAIR permits given the current prospects of the CAIR program in Minnesota. Instead, for as long as CAIR is effective in Minnesota, the permits for CAIR affected facilities will have a condition at the total facility level requiring compliance with CAIR with a sunset provision linked to EPA's future regulatory actions. This CAIR permit language will be incorporated into Title V permits the next time it is open for any reason. For questions regarding CAIR permits in Minnesota, please contact Carolina Schutt at 651-757-2706.

December 11, 2008

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Continuous Opacity Monitoring Systems (COMS) Attenuator Calibrations Guidance
2. Guidelines for Submitting Air Quality Permit Applications

#### 1. Continuous Opacity Monitoring Systems (COMS) Attenuator Calibrations Guidance

Minn. R. 7017.1210, subp. 4 with regard to Continuous Opacity Monitoring Systems (COMS) Attenuator Calibrations cites 40 CFR Part 60, appendix B, section 7.1.3. for the procedure required to complete calibrations. However section 7.1.3 has been repealed. Due to this change in the federal rules, the Minnesota Pollution Control Agency (MPCA) has created a guidance document to provide clarification on how to deal with the situation.

The guidance document is available on the MPCA Performance Test website <http://www.pca.state.mn.us/publications/aq-f6-14.pdf> . If there are additional questions please contact a member of the Performance Test Group. Contact information can be found at <http://www.pca.state.mn.us/air/performance-test.html>

#### 2. Waste Prevention in Submittals

In an effort to promote greater use of recycled and environmentally preferable products and minimize waste, all submittals should comply with the following guidelines:

- \* All submittals and copies should be duplex-printed (double-sided), and encouraged to be printed on recycled paper with a minimum post-consumer content of 30%.
- \* Unnecessary samples, attachments or documents not specifically asked for should not be submitted. This includes form instructions.
- \* Use of other products that contain recycled content is encouraged for submittals including, but not limited to, folders, binders, envelopes, and boxes.

November 14, 2008

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

#### 1. 2008 Guidance on Data Submittals

##### \*Data Collection Notice for the Air Pollutant Emission Inventories

##### -Annual Criteria Emission Inventory

The 2008 blank forms for the annual criteria emission inventory will be sent to your facility in late December. The due date to return the 2008 annual criteria emission inventory is April 1, 2009.

##### -Annual Criteria Emission Inventory - Option D Registration Permittees

The Option D criteria pollutant emission inventory (EI) form for 2008 has changed. The MPCA understands that currently the Option D permit does not require the calculation of PM<sub>2.5</sub> (particulate matter less than 2.5 micrometers) and NH<sub>3</sub> (ammonia); however, these pollutants must be calculated and reported to the EPA per 40 CFR Part 51. The changes on the new form include combustion throughputs and a break down of PM/PM<sub>10</sub> emissions (this information will allow the MPCA to calculate PM<sub>2.5</sub> and NH<sub>3</sub> emissions for your facility). The new information asked for on the updated form should be the same information your facility has recorded and utilized in order to calculate the criteria emissions (CO, NO<sub>x</sub>, Pb, PM<sub>10</sub>, PM, SO<sub>2</sub>, VOC) for previous emission inventory submittals.

##### -Air Toxics Emission Inventory

For 2008, the MPCA will request emission inventory data for air toxic pollutants at the same time that annual emission inventory forms for criteria pollutants are sent out. In December 2008, you will receive a package that includes detailed instructions for completing the triennial air toxics emission inventory. The due date to return the 2008 air toxics emission inventory is May 1, 2009

## -Air Toxics Emission Inventory - Option D Registration Permittees

The MPCA encourages electronic data submittals for the air toxics emission inventory to speed up the process. Option D facilities that emitted over 4 tons of VOC in 2007 will receive air toxics emission inventory forms to complete. Facilities that emitted less than 4 tons of VOC in 2007 will not receive an air toxics emission inventory form but are also welcome to provide emission information to the MPCA by downloading forms from <http://www.pca.state.mn.us/air/toxics/toxics-dataguidance.html>\*. Hot mix asphalt facilities do not need to report air toxics emissions because the information collected in the annual criteria emission inventory will allow the MPCA to calculate air toxics emissions for them.

In September of 2008, Option D facilities that met the criteria listed above were sent a postcard requesting the e-mail address of a contact person. This e-mail address will allow the MPCA to e-mail out the electronic version of the emissions inventory form to facilities. Many facilities have responded to the e-mail address request, but many facilities still have not. It is important that facilities respond to this request in order to ensure that they receive the electronic form in December. If you have not responded to the e-mail address request, please send an e-mail response to Nathaniel Edel at [Nathaniel.Edel@pca.state.mn.us](mailto:Nathaniel.Edel@pca.state.mn.us).

\* This web page will be updated with 2008 data submittal guidance by mid to late December when the emission inventory forms are mailed out.



November 5, 2008

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

#### 1. New Phone System Coming to MPCA

By December 1, 2008, the transition to a new phone system, Internet Protocol Telephony, will be completed for Minnesota Pollution Control Agency (MPCA) St. Paul office. As part of this change in phone systems, MPCA staff will receive new phones and new phone numbers.

There will be a short period of time after the new phone number is active you will be able to reach MPCA staff using the old phone number and new phone number. After December 15, 2008, you will only be able to reach MPCA staff using the new phone number. Phone numbers for MPCA staff are available at the following link: <http://www.pca.state.mn.us/pca/staff/index.cfm>. The main MPCA office number (651/296-6300 or 1-800-657-3864) will not change.

Note: The phone transition for the Brainerd, Duluth, Rochester, and Detroit Lakes offices will occur early 2009. The staffs in the Mankato, Marshall, and Willmar offices already have new phone numbers.

September 25, 2008

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Final Public Meetings On Changes To MPCA Permit Fee Rules
2. National Emissions Standards for Hazardous Air Pollutants, Part 63 - Once In, Always In

1. Final Public Meetings On Changes To MPCA Permit Fee Rules

Meetings held Sept. 29 - Oct. 2, in Brainerd, Rochester, St. Paul and Willmar

Contact: Jim Brist, 651-297-8331

Toll-free: 1-800-657-3864

The Minnesota Pollution Control Agency (MPCA) will hold a final round of public meetings to receive and discuss suggestions to draft amendments to the air and water permit fee rules that partially fund permit activities. The final set of meetings will take place before formal rule hearings begin.

Businesses and municipalities, including large feedlot operations, that hold air and water permits from the MPCA, are encouraged to attend. Environmental groups and other interested parties are also encouraged to attend the meetings to ask questions and provide comments on draft rule language.

Most meetings (with the exception of the one held in St. Paul) will be open from 1-7 p.m. with presentations at 1:30 p.m. and 4:30 p.m. There will be time before or after presentations for questions and discussion of alternative rule language. Individuals will be able to determine what permit fees would apply to their facilities.

Meetings will be held on:

- \* Monday, Sept. 29 - MPCA St. Paul office, 520 Lafayette Road N. - 2 p.m.-4 p.m. (one presentation only at 2:30 p.m.).
- \* Tuesday, Sept. 30 - MPCA Rochester office, Country Inn and Suites, 77 Woodlake Drive SE- 1 p.m.-7 p.m.
- \* Wednesday, Oct. 1 - Kandiyohi Health and Human Services building in Willmar, 2200 23rd St. NE - 1 p.m.-7 p.m.
- \* Thursday, Oct. 2 - MPCA Brainerd office, 7678 College Road, Suite 105 - 1 p.m.-7 p.m.

Air and water permit holders are strongly encouraged to review the proposed draft rule and background information on the MPCA's Web site at [www.pca.state.mn.us/permits/airwaterfees.html](http://www.pca.state.mn.us/permits/airwaterfees.html).

## 2. National Emissions Standards for Hazardous Air Pollutants, Part 63 - Once In, Always In

EPA will soon be closing a significant era in air regulations-the completion of National Emission Standards for Hazardous Air Pollutants (NESHAPs) controlling the release of hazardous air pollutants as authorized by the Clean Air Act Amendments of 1990. The standards are more frequently referred to by the method used to develop the emission values, the "MACT standards" (maximum available control technology). When the industrial boiler NESHAP is completed, EPA will have established standards for 80 categories of major industrial sources.

The "substantial compliance deadline" for the last of the promulgated major source NESHAPs has come and gone-the latest compliance deadline was June 2007 for reciprocating internal combustion engines (40 CFR Part 63 Subp. ZZZZ). Sources affected by a NESHAP were to have taken steps

to make changes to their facility by that standard's compliance deadline so that its PTE was below the major HAP source threshold to avoid the compliance requirements of the standard. The compliance deadline is most often three years after the promulgation of the standard.

Once the compliance deadline for a NESHAP is past, facilities described as "affected units" in the standard are major HAP sources and must comply with the emission limits, monitoring recordkeeping and reporting the standard. After this date, the facility will no longer qualify for any type of "minor HAP source" treatment within emission standards nor permitting. Thus the phrase "once in, always in" (OIAI).

The only exemption to this condition is if modifications are made at a facility such that the source or unit no longer meets the description of the "affected facility" or "affected unit" within the NESHAP. A facility cannot be relieved of compliance with the NESHAP even if actual HAP emissions never reach major source thresholds, nor if a chemical is reduced or eliminated. Once the Part 70 permit has been issued requiring compliance with a NESHAP, the facility remains an affected facility, regardless of any potential future permit conditions that might restrict emissions to below major HAP source thresholds.

This appears to be a very onerous requirement, but is very important in maintaining achievements in pollution reductions and an even playing field between affected industries. EPA recognized that without a OIAI policy, facilities could "backslide" from MACT control levels by obtaining potential-to-emit limits, escaping applicability of the MACT standard, and increasing emissions to the major-source threshold. (Seitz, J. "Potential to Emit for MACT standards-Guidance on Timing Issues. May 16, 1995 <http://www.epa.gov/ttn/oarpg/t3/memoranda/pteguid.pdf>).

The MPCA has long recognized that this federal policy might interfere with future efforts to minimize or eliminate toxic chemical use, and has supported EPA efforts to amend permitting rules to allow facilities to become a non-major HAP source. Until EPA revises its guidance and permitting regulations, the MPCA is not in a position to make alternative interpretations.

September 10, 2008

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

## Reporting Requirements for Global Warming Potential (GWP) Greenhouse Gases

This past legislative session the Minnesota State Legislature passed, and Governor Pawlenty signed, an act that requires reporting on the manufacture and purchase of classes of chemicals known as high global warming potential (GWP) greenhouse gases. The legislation was Senate File 3337, and is now known as 2008 Minn. Laws Ch. 296, Art. I, Sec. 22 (to be codified at Minn. Stat. § 216H.11). The statutory language can be found at the following website: <https://www.revisor.leg.state.mn.us/laws/?id=296&year=2008&type=0>

The chemicals subject to reporting are hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). These chemicals are commonly used in applications such as refrigeration, space cooling and air conditioning, as well as foam insulation, fire protection, and semiconductor manufacturing.

While the list of these chemicals is long, some of the more widely used include: HFC-134a (R-134a), HFC-125 (R-125), HFC-143a (R-143a), HFC-152a (R-152a), HFC-236fa (R236fa), and PFC-3-1-10 (R-3-1-10).

The legislation requires reporting from three different entities, beginning on October 1, 2008:

- \* Manufacturers of high-GWP greenhouse gases must report to the MPCA the total amount of each such gas sold to purchasers within Minnesota. Reporting is for sales during the previous calendar year.
- \* Purchasers of high-GWP greenhouse gases must report to the MPCA the total amount of each such gas purchased, if purchases are above a threshold amount of 500 metric tons of carbon dioxide equivalent. Reporting is for purchases during the previous calendar year.
- \* Manufacturers of motor vehicles containing air conditioners that use HFC-134a must report the refrigerant leakage rate for the air conditioners in each make, model, and model year. Reporting is for new vehicles sold after January 1, 2009, and must occur 90 days prior to the sale of any new model.

Further information on this reporting requirement and appropriate reporting forms can be found on the MPCA's website at: <http://www.pca.state.mn.us/climatechange/index.html>

For questions concerning the reporting requirements for high-GWP manufacturers and purchasers, please go to <http://www.pca.state.mn.us/climatechange/hgwp.html>, or contact Jim Sullivan, email [jim.sullivan@pca.state.mn.us](mailto:jim.sullivan@pca.state.mn.us).

For questions concerning the reporting requirements for automobile manufacturers, please go to <http://www.pca.state.mn.us/climatechange/mobileair.html>, or contact Barbara Conti email [barbara.conti@pca.state.mn.us](mailto:barbara.conti@pca.state.mn.us).

All MPCA staff can be reached by calling 651-296-6300 or 800-657-3864 (non-metro).

August 21, 2008

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

1. MPCA Implements New Source Review Program for Particulate Matter Less Than 2.5 Micrometers

On May 16, 2008, the Environmental Protection Agency (EPA) published the "Final Rule for Implementation of the New Source Review (NSR) Program for Particulate Matter Less Than 2.5 Micrometers (PM 2.5)." As a delegated state, the Minnesota Pollution Control Agency (MPCA) is required to implement these changes to the Prevention of Significant Deterioration (PSD) program beginning July 15, 2008. The MPCA has developed a plan on how it intends to implement the NSR program for PM 2.5. For more information, a MPCA web page has been created at:

<http://www.pca.state.mn.us/air/permits/nsr/nsr-pm25revisions.html>

June 24, 2008

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

#### 1. Permit Fee Stakeholder Process

On June 12th a letter was sent to Air and Water Permittees inviting their participation in a stakeholder process to address changes to the air and water permit fees. (Mn. Rule ch. 7002). In that letter stakeholders were encouraged to visit a website that explains this rulemaking and at that same site complete a survey indicating their interest in participating in the stakeholder process. You can access the website at <http://www.pca.state.mn.us/permits/airwaterfees.html>. Due to the significance of the changes in fees being directed by the Legislature, we strongly encourage you to consider participating in this process which will begin in the next few weeks.

April 8, 2008

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Request for Comments on Possible PSD Rulemaking
2. New CD-01 and CD-05 Compliance Plan Forms for Air Quality Permit Applications

1. Request for Comments on Possible PSD Rulemaking

The Minnesota Pollution Control Agency (MPCA) is requesting comments on a possible rule revision affecting the MPCA's Prevention of Significant Deterioration of air quality rule (Minn. R. 7007.3000) and how the MPCA administers the Prevention of Significant Deterioration (PSD) program. The MPCA currently operates the PSD permitting program through direct delegation of authority from the U.S. Environmental Protection Agency (EPA); as a delegated program, Minnesota is constrained to administer the federal program without any changes for state consideration. At this time, the MPCA is considering whether to amend Minn. R. 7007.3000 and whether to submit a State Implementation Plan (SIP) to the EPA in order for our PSD permit program to become a "SIP-approved" program rather than a delegated program.

A "Request for Comments," published in the Minnesota State Register on April 7, provides more details about the rulemaking and comment process. The comment period will go until May 30. You can view this public notice under the "Public Notices" section of the MPCA website at: <http://www.pca.state.mn.us/news/index.html>. The MPCA welcomes questions, comments and suggestions, and will provide updates, including notices of informal meetings (if held). Send your name and e-mail address to: Catherine Neuschler at: [catherine.neuschler@pca.state.mn.us](mailto:catherine.neuschler@pca.state.mn.us) or (651) 296-7774.

2. New CD-01 and CD-05 Compliance Plan Forms for Air Quality Permit Applications

The MPCA staff has developed a new CD-01 form which is now available on the MPCA's website at: <http://www.pca.state.mn.us/air/permits/forms.html#1c-compliance>.

The format of the new CD-01 form is quite different from the previous version. Instead of listing rule citations and trying to create text for permit language, the applicant is directed to the answers given on GI-09 series of forms, and asked to use CD-01 to propose methods of compliance demonstration. There is also a separate form, CD-05, to use when describing control equipment operation, and the existing forms GI-09C, GI-09A, and CH-07 have been updated for easier use with the new CD-01.

Please use these new forms when applying for the first time for a new individual operating permit (federal or state) or for an amendment to an existing individual operating permit (federal or state).

March 10, 2008

Greetings Air Quality Technical Information subscribers -

Three Listserv items for today:

1. 2007 Emission Inventory forms Due April 1, 2008
2. Application Review Process Begins March 31, 2008
3. Changes and Clarifications Regarding the DRF-1 Quarterly Reporting Form

1. 2007 Emission Inventory forms Due April 1, 2008

Facilities with an Air Permit must submit their air Emission Inventory (EI) for 2007 to the Minnesota Pollution Control Agency (MPCA) by April 1, 2008.

2007 Emission Inventory forms were sent to facilities in December 2007. If your facility has not submitted their 2007 EI yet and is having trouble locating these forms, please contact Michael Smith at (651) 282-5849 or Theresa Haugen at (651) 296-8709. For more information about the 2007 Air Emission Inventory, visit the MPCA EI website at <http://www.pca.state.mn.us/air/emforms.html>.

2. Application Review Process Begins March 31, 2008

Beginning March 31, 2008, the MPCA will begin an application completeness review process for permit amendment and new facility Total Facility Permit applications. The goal is to shorten the cycle time for issuing permits by making sure that applications are complete when the permit engineer begins working on a permit. The completeness review checklists will be available on the website at the same location as the permit application forms (<http://www.pca.state.mn.us/air/permits/forms.html>). These checklists are provided on our website to aid you in ensuring that your application is complete. Please do not submit any completeness review checklists that you use as they are not required application documents. Following the completeness review, you will be notified of the status of your application.

3. Changes and Clarifications Regarding the DRF-1 Quarterly Reporting Form

The new DRF-1 form is serving the same purpose as previously but it has been further clarified what to include on the DRF-1 form vs. the DRF-2 form. The difference is as follows.



DRF-1: to report direct excess stack emissions recorded by Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

DRF-2: to report deviations of permitted operating conditions and/or surrogate parameters whether recorded periodically or continuously or potential excess emissions identified through recordkeeping. (i.e. flow rate, temperature, throughput, control equipment operating parameters, fuel use records, etc.).

All excess emissions need to be reported within the Total Excess Emissions columns on the new DRF-1. Exempt Excess Emissions can be separated out using the appropriate columns now added to the form however the exempt excess emissions are a subset of the total and need to be included as such.

Also, each period of excess emissions must be reported as a separate line item on the form. Consecutive events may be reported as one item (i.e. excess emissions from 8:00 am to 8:59 am include ten 6-min averages and may be reported as 60 min of excess emissions) but each individual nonconsecutive event must be reported separately. The instructions on the new form should help clarify this.

It has been asked to define when the MPCA considers a unit to be operating and therefore still needing to be monitored. There is not a concise answer for this. After further discussion internally and review of the rules, the best answer is if the unit is still causing emissions then the unit is still considered in operation. Due to multiple types of emission units, applicable rules, permit conditions, etc.; a blanket statement as to when the unit is considered not to be operating may prove to be problematic. For instance, one boiler may no longer cause emissions once the fuel supply is cutoff. But, another boiler with different fuel may continue to have smoldering material in it and cause emissions for some time after the fuel supply is cut. Please contact the MPCA if you wish to discuss the best way to handle individual situations.

Another item that has come up is whether the various categories of excess emissions (startup/shutdown, control equipment, process problems, known cause, and unknown cause) need to be listed specifically on the form. For consistency and to facilitate data analysis, all excess emissions should be categorized into one of the five reasons listed above. If facilities wish to provide further information as to the reason for the excess emission, this is encouraged (i.e. Control Equipment/ESP problem). The Corrective Action column on the form may also serve to explain the exact nature of the cause of the excess emission.

The new form is available on the MPCA Air Permit forms website at <http://www.pca.state.mn.us/air/permits/forms.html> under Item 6 Compliance Recordkeeping Submittals, and Reporting. The new form is the mandatory form for quarterly excess emissions reporting.

Thank you to everyone who helped work on this project. It was a beneficial, collaborative effort that allowed addressing both facility and MPCA needs as well as provided further consistency with regards to reporting.

If you have any questions or comments, please feel free to contact the Stack Test Group at (651) 296-7169.

November 30, 2007

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

1. Amendments to Air Quality Rules Finalized

Changes to state air quality rules, including air quality permit rules, compiled in a rulemaking called the "Multi-Rule" were published November 19th in the State Register. The rule amendments were effective on Monday, November 26th. For a summary of the rule changes as well as a copy of the final rules, go to:  
<http://www.pca.state.mn.us/air/aqrule-amendments.html>

September 12, 2007

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

1. Webpage related to the Industrial Boiler and Process Heater NESHAP (40 CFR Pt 63 Subp. DDDDD)

The MPCA has updated its webpage related to the Industrial Boiler and Process Heater NESHAP (40 CFR Pt 63 Subp. DDDDD). Frequently asked questions are now included, addressing the scope of the request for 112(j) submittals and compliance with existing permits with Subp. DDDDD conditions.

The FAQ's represent most questions already asked of the MPCA; please continue to use the contacts on the webpage to seek further information or guidance.

<http://www.pca.state.mn.us/air/permits/boilerneshap.html>

August 20, 2007

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Next Steps for Industrial Boilers Subject to Industrial Boiler and Process Heaters NESHAP
2. 2007 Area Source Update WEBCAST - August 28, 2007

1. Next Steps for Industrial Boilers Subject to Industrial Boiler and Process Heaters NESHAP

U.S. District Court of Appeals for the DC Circuit vacated the National Emissions Standard for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial and Institutional Boilers and Process Heaters (Subpart DDDDD) on July 30, 2007. U.S. EPA will now undertake a new rulemaking to re-establish standards for existing and new boilers and process heaters, but is not likely to complete this effort for several years.

The MPCA is now required by sections 112(g) and 112(j) of the Clean Air Act to establish case-by-case maximum available control technology (MACT) limits for HAPs from industrial boilers and process heaters at facilities that were to be regulated by this standard. Facilities that are major HAP emitters (the potential to emit of greater than 10 tons per year of a single HAP or 25 tons per year of all HAPs) and had a boiler or process heater operating on May 6, 2002, are subject to the requirements of 112(j). Boilers or process heaters installed after that date are subject to the requirements of Section 112(g) of the Clean Air Act.

- Existing Boilers and Process Heaters-a "112(j) determination" or "MACT Hammer" If you are an owner or operator of boiler or process heater installed on or before May 6, 2002 AND the facility is a major source of HAPs, a 112(j) application must be submitted to the MPCA, Air Quality Permit Document Coordinator by September 28, 2007. This does not depend on the status of your current air emissions operating permit.

No separate form is necessary, however, you may choose to use forms EC-02 and EC-13A, -13B, and/or -13C to aid in providing specific information.

The MPCA will be sending notices directly to facilities that are known by the MPCA to be subject to the Industrial Boiler NESHAP alerting the facility to the need for a case-by-case MACT emission limits on the boiler or process heater. If the 112(j) requirements apply to you but you don't receive a direct notice from the MPCA, you must still comply with the requirement to submit an application.

- New Boilers and Process Heaters

Boilers or process heaters installed after May 6, 2002 require 112(g) determinations. The MPCA recognizes that there are a number of facilities where boilers and process heaters have been installed after May 2002 and are now operating in Minnesota without 112(g) determinations. If you are the owner or operator of such a unit, please review the permit application requirements of 40 CFR 63.43 (d) and (e). A request for a 112(g) determination (a case-by-case MACT limit for new sources) should be submitted by September 28, 2007.

More information is available at

<http://www.pca.state.mn.us/air/permits/boilerneshap.html>. The MPCA will post frequently asked questions as issues are resolved. Additional information about Air Permits is available at the following link:  
<http://www.pca.state.mn.us/air/permits/index.html>.

## 2. 2007 Area Source Update WEBCAST - August 28, 2007

The following webcast will be shown at the Minnesota Pollution Control Agency office which is located at 520 Lafayette Road, Saint Paul. If you are interested in attending, please contact Mike Nelson, MPCA Small Business Ombudsman, at (651) 297-8615 or [michael.nelson@pca.state.mn.us](mailto:michael.nelson@pca.state.mn.us). There is no cost to attend this.

### 2007 Area Source Update WEBCAST

August 28, 2007

12:00 pm - 1:00 pm Central

The U.S. EPA Office of Air Quality Planning and Standards (OAQPS) will hold a one hour live webcast on area sources based on the 1990 Section 112 (k) emissions inventory. The strategy initially identified 29 source categories, but through several subsequent notices, 70 source categories were listed and published. This webcast will feature experts who will discuss the 7 source categories promulgated June 15, 2007, which are: Wood Preserving; Carbon Black Production; Acrylic Fibers/Modacrylic Fibers Production; Chemical Manufacturing; Chromium Compounds; Flexible Polyurethane Foam Production; Flexible Polyurethane Foam Fabrication Operations; and Lead Acid Battery Manufacturing. This webcast will include implementation and current monitoring and recordkeeping and control requirements. There will be an opportunity to send in your questions via telephone or via fax.

Target Audience: Tribal, State, and local air pollution agency personnel and industry.

### 3. PM Calculator Software

As of March 31, 2006, US EPA no longer supports the PM Calculator software (<http://www.epa.gov/ttn/chief/software/pmcalc/index.html>). The PM Calculator is referenced in MPCA Air Emission Risk Analysis guidance (<http://www.pca.state.mn.us/publications/aq9-12.pdf>) for calculating filterable PM<sub>2.5</sub> emissions. PM<sub>2.5</sub> emission factors are still available in EPA's WebFIRE database (<http://cfpub.epa.gov/oarweb/index.cfm?action=fire.main>) and AP-42 emission factor compilations (<http://www.epa.gov/ttn/chief/ap42/index.html>).

July 19, 2007

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

## 1. Numbering Permitted Items in Your Application

Are you applying to amend an existing air quality permit to add or replace equipment and wondering what is the next available ID number to use in your application? We can help you identify the next available number to use for an emission unit (EUXXX), stack (SVXXX), group (GPXXX), pollution control equipment (CEXXX), monitor (MRXXX), continuous monitor system (CMXXX), data acquisition system (DAXXX), tank (TKXXX), or fugitive (FSXXX) source.

Contact the Air Quality Permit Document Coordinator at [beckie.olson@state.mn.us](mailto:beckie.olson@state.mn.us) and provide the following information:

- \*\* The facility name and ID number - this is the 8-digit portion of the permit number.
- \*\* If you do not currently have an air emission permit from MPCA, have you been submitting annual air emission inventories? If yes, your facility ID number will also be listed on that paperwork.
- \*\* What do you want to know (e.g., the next available EU number to use, the next available CE number to use, etc.)?
- \*\* If you have submitted a permit application that has not yet been processed, does that application also involve removing, replacing, or adding equipment? These changes must be considered when determining the next number(s) to use in subsequent applications.

Please remember that the following principles apply to item numbering in applications:

- \*\* Permitted items (meaning EU, CE, SV, GP, MR, DA, CM, FS, or TK) must be numbered consecutively. New items must use the next number after the last one used in your current permit or as recorded in the most recent MPCA Emission Inventory.
- \*\* You may not re-number items already listed in a permit or Emission Inventory.
- \*\* A number used for an item that will be retired, removed, or replaced is no longer available to use for new or replacement units.

Please note that for cross reference purposes, you could use the "Description" column in the equipment description forms to add a notation which identifies the equipment according to your internal records. However, we still need a general statement describing the equipment.

June 7, 2007

Greetings Air Quality Technical Information subscribers -

2 Listserv items for today:

1. Emissions from Utilizing Natural Gas as an Onsite Fuel Source
2. A reminder regarding when to prepare an AERA

1. Emissions from Utilizing Natural Gas as an Onsite Fuel Source

MPCA staff have reviewed past practices of the onsite sources that should be included in the Risk Analysis Screening Spreadsheet (RASS) and have concluded that emissions from utilizing natural gas as a fuel should also be quantified. If your facility utilizes natural gas as a fuel in boilers or other devices and you are completing an AERA, the combustion products and their emissions from natural gas use need to be included in the RASS.

Several developments prompted a review of the exclusion of emissions when utilizing natural gas. These developments include the availability of information, improved tools for assessing health impacts, and the need to address the health impacts of natural gas combustion in a facility's evaluation. Over the past year, several facilities have quantified these emissions and included them in their analysis and submittals to ensure a more complete quantification of estimated impacts. MPCA staff is also developing explicit guidance when assessing cumulative potential effects for the environmental review process.

2. A reminder regarding when to prepare an AERA

Though there have been changes in the thresholds on when to prepare an environmental work sheet, those changes do not eliminate the need for an AERA. Proposers should still plan to complete an AERA if the potential to emit for their proposed change or new facility is >100 tpy for any individual criteria pollutant. The AERA web pages ( <http://www.pca.state.mn.us/air/aera.html> ) list the categories that MPCA would expect completion of an AERA as part of the permit application or environmental review process.

Remember to check the website for updates and changes to the AERA guide.

Please contact the staff listed on the AERA web pages if you have questions or concerns.



May 8, 2007

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Emission Restrictions in a Permit Application
2. Public Comment Period Begins for Proposed Amendments to State Air Quality Rules

1. Emission Restrictions in a Permit Application

You may have submitted or may want to submit a permit application in which you propose limits on your operations to restrict your potential emissions to avoid a regulatory requirement. Before certain types of limits can become effective, a major amendment or reissuance process must be used to include them in your permit.

In these cases, your permit must go through public notice and be issued for the limits to become enforceable. These limits include but are not limited to any limits taken to avoid being a major source under New Source Review, Part 70, and the NESHAPs. If a permit containing the limits has not been issued, the limits are not effective and the regulatory requirement will not be avoided due to the proposed limits. If you are planning a subsequent project and the permit containing the emission limits has not yet been issued, do not consider those limits when you propose other projects.

For example, if you have proposed limits to avoid NSR and Part 70 in a pending permit application but the permit has not yet been issued, your facility is still considered a major source under both programs. If you have a project that you plan to implement in the meantime, you must assume that your facility is still considered an existing major source for both programs when evaluating what type of permit process applies to the proposed project.

## 2. Public Comment Period Begins for Proposed Amendments to State Air Quality Rules

The formal public comment period for the MPCA's proposed amendments to its air quality rules (the "multi-rule") began Monday, May 7 and ends at 4:30 p.m. on June 6. The draft rule and Statement of Need and Reasonableness for the rule can be viewed at: <http://www.pca.state.mn.us/news/data/index.cfm?PN=1>

This rulemaking has the overall purpose of keeping the air quality rules current, removing redundant rule language, ensuring consistency with applicable federal regulations, clarifying ambiguous language and correcting gaps or errors identified while administering the rules. The proposed changes to the control equipment rule represent a rule update with a broader scope. Here the intent is to update an existing, elective rule so that it reflects modern day control assumptions and can potentially be utilized by more Permittees to help them determine permit applicability. The new rules for regional haze represent the initial steps needed for the MPCA to implement the federal regional haze program.

If the rule is non-controversial, it could be effective by late summer.

April 6, 2007

Greetings Air Quality Technical Information subscribers -

Three Listserv items for today:

1. Permitting of Stationary IC Engines Subject to NSPS, Subp. III
2. Air Emissions Risk Analysis (AERA) - Frequently Asked Questions
3. Permit Application Instructions

1. Permitting of Stationary IC Engines Subject to NSPS, Subp. IIII

EPA promulgated a New Source Performance Standard (NSPS) for Stationary Compression Ignition Internal Combustion Engines in July 2006 (71 FR 39172). Applications for compression ignition internal combustion engines include fire pump engines, emergency generators, compressors, and other similar widespread uses.

MPCA staff have received questions from facilities about permitting of units subject to this NSPS. Please note that all sources purchasing or owning engines subject to Subp. IIII must comply with the requirements of the NSPS, regardless of permitting status. (Link to EPA's website: <http://www.epa.gov/ttn/atw/nsps/cinsps/cinspspg.html> )

The standard has compliance requirements for both manufacturers and owners and operators of these engines. The complexity of the compliance requirements vary depending on the type of engine. You will need the Model Year, Cylinder Displacement and Megawatt rating to determine the applicable requirements under the rule.

For many engines the compliance requirements are uncomplicated. For owners and operators of some engines, the only compliance requirements are:

- an initial notification (but not for emergency engines), and
- record keeping of documentation showing the engine is certified or meets the standards, hours of operation in emergency/non-emergency mode (for certain emergency engines), engine maintenance performed, and notifications submitted.

You will need to review the rule to determine what compliance requirements apply for your engine.

The MPCA believes engines subject only to the notification and record keeping compliance requirements listed above could qualify under Minn. R. 7007.0300, subp. 1(F) (Sources Not Required to Obtain a Permit) and Minn. R. 7007.1110,

subp. 2(C) (Registration Permit General Requirements) provided all other conditions are met. [<http://www.revisor.leg.state.mn.us/arule/7007/0300.html> and <http://www.revisor.leg.state.mn.us/arule/7007/1110.html>] This means that:

- If this is the only emission source at the facility, and you are subject only to the minimally listed requirements, the MPCA believes that no permit may be required if the potential to emit is less than state permitting thresholds
- If you currently do not hold a permit, and the addition of this unit would put your facility over the permit thresholds for requiring a permit, you will need to obtain a permit. If your engine is subject only to the minimally listed requirements, and your facility meets any other applicability requirements, you may apply for a registration permit.
- For facilities that already have a registration permit, if the engine you want to install is subject only to the minimally listed requirements, AND you will continue to qualify for the registration permit otherwise (emissions less than thresholds, etc.), you may install the engine under your registration permit.
- If your facility currently operates under a capped permit, please contact the MPCA Customer Assistance Center (contact information below) for information regarding permitting requirements.
- If your facility currently operates under a state or Title V permit, you will need to follow the permit amendment rules as you would for any other modification.

The MPCA believes facilities with engines greater than 30 liters per cylinder, engines using particulate filters to comply with the NSPS, engines using performance testing to comply with the NSPS, engines needing to install an hour meter (i.e. it did not come installed from the manufacturer) or any engine with other compliance requirements beyond the notification and record keeping requirements listed above would not qualify under Minn. R. 7007.0300, subp. 1(F) and Minn. R. 7007.1110, subp. 2(C) and therefore, permits or permit amendments may be required

The MPCA is in the process of proposing rule changes that will add 40 CFR 60, Subpart IIII (Standards of Performance for Stationary Compression Ignition Internal Combustion Engines) as one of the NSPS specifically allowed in Minn. R. 7007.0300, subp. 1(B), Minn. R. 7007.1110, subp. 2(C), (Registration Permits) and Minn. R. 7007.1140, subp. 2(E) (Capped Permit Eligibility Requirements) (as part of the "multi-rule" amendments). The proposed rule amendments will clarify which engines under Subpart IIII qualify under each of these rule parts and will expand the engines allowed under certain permit categories.

Additional questions can be directed to the MPCA's Customer Assistance Center at (651) 297-2274 or (800) 646-6247.

## 2. New on the Web - Air Emissions Risk Analysis (AERA) - Frequently Asked Questions

The website now has a new section to answer Frequently Asked Questions or FAQs about the AERA. This section addresses issues related to what the AERA is, what it does, and who is involved among other issues. It also has some helpful information for consultants and facilities doing an AERA. Please visit AERA FAQs at <http://www.pca.state.mn.us/air/aera-faq.html> to learn more about the AERA.

## 3. Permit Application Instructions

A friendly reminder not to include the instructions for filling out application forms (unless the instructions are on the back of a form) as part of the application package. It makes it easier for the permit engineer to review the application without the instructions.

February 22, 2007

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Halogenated Solvent Cleaning National Emission Standard for Hazardous Air Pollutants
2. EPA Proposal to Eliminate "Once In, Always In" Policy for Major Sources of Toxic Emissions closes March 5, 2007

1. Proposed Rule: Halogenated Solvent Cleaning National Emission Standard for Hazardous Air Pollutants

In August 2006, the U.S. EPA proposed rules to revise the requirements of the Halogenated Solvent Cleaning National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR Part 63 Subpart T). The revisions are intended to limit emissions of perchloroethylene (PCE or PERC), trichloroethylene (TCE), and methylene chloride (MC) by capping total facility-wide allowable emissions of these chemicals. The rule changes are required by the Clean Air Act section 112(d)(6) to revise NESHAPs in order to protect public health with an ample margin of safety and to prevent adverse environmental effects.

The proposal (see 71 FR 47675) suggested different ways of setting emission limits in order to achieve the ample margin of safety required by the Act. The EPA has announced a Notice of Data Availability (NODA) because during the comment period for the proposed changes, some affected facilities raised issues about compliance matters. A second comment period is now open related to these specific issues (see <http://www.epa.gov/ttn/atw/degrea/fr14de06.pdf>).

We are alerting you to this rulemaking because the proposed allowable emission levels of PCE, TCE and/or MC appear to be below current actual emissions at some Minnesota facilities subject to this standard. Compliance with this standard may require significant review of current chemical use, control levels, or even cleaning equipment. If adopted as proposed, existing facilities would have two years to come into compliance.

EPA's proposed rules for halogenated solvent cleaners can be found at this website: <http://www.epa.gov/ttn/atw/degrea/halopg.html>

2. Comment period on EPA Proposal to Eliminate "Once In, Always In" Policy for Major Sources of Toxic Emissions closes March 5, 2007

EPA issued a proposal to eliminate its "once in, always in" policy for major sources of toxic air emissions and instead allow a major source to become an area source at any time by limiting its potential to emit (PTE) toxic air pollutants to below the major source thresholds. The limit would be enforced through a permit. Major sources are those with a PTE of more than 10 tons per year of a single toxic air pollutant or 25 tons per year of any combination of toxic air pollutants. (Sources that emit less than these amounts are called area sources.)

The new proposal would replace EPA's "once in, always in" policy, issued in May 1995, which stated that once a source was subject to a major source standard, it would always be subject, regardless of the source's subsequent toxic air pollutant emissions. The comment period for this rule proposal closes March 5, 2007. For more information: <http://www.epa.gov/fedrgstr/EPA-AIR/2007/January/Day-03/a22283.pdf>

December 19, 2006

Greetings Air Quality Technical Information subscribers -

Three Listserv items for today:

1. Biofuel Update
2. Regional Haze Information Meeting
3. PM Calculator Software

1. Biofuel Update

Facility owners and operators are increasingly interested in replacing fossil fuels with biofuels in applications such as boilers, process heaters, and generators. The MPCA's Air Policy Unit has hired an engineer, Heather Magee, to coordinate the development of biomass technical information for stationary sources. Part of Heather's work will be managing a contract to develop a biomass combustion emission factors database for stationary source applications. An Informal Solicitation for Bids for this contract was posted on December 18th. To review the Informal Solicitation for Bids go to:

<http://www.mmd.admin.state.mn.us/process/admin/ptlist.asp>.

If you have questions about biomass usage in stationary sources, Heather can be reached at (651) 215-0253 or [heather.magee-hill@pca.state.mn.us](mailto:heather.magee-hill@pca.state.mn.us).

2. Regional Haze Information Meeting

Date: Wednesday, Jan. 31st

Time: 1:00- 4:00 PM

Place: MPCA St. Paul Office, Boardroom Central (lower level)

At this meeting, the latest technical information for the regional haze implementation plan will be provided. In addition, the MPCA will provide an update on the status of specific items such as the implementation of Best Available Retrofit Technology (BART) and the decision as to whether the Clean Air Interstate Rule should substitute for BART-eligible electric generating units in the state. If you are interested in attending this meeting, please provide your name to Mary Jean Fenske ([maryjean.fenske@pca.state.mn.us](mailto:maryjean.fenske@pca.state.mn.us)).



November 27, 2006

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Fuel Switching - Amendment to Permit May Be Required
2. Environmental Bulletin

1. Fuel Switching - Amendment to Permit May Be Required

The Minnesota Pollution Control Agency is seeing a large increase in facilities/companies wanting to use new fuels because of potential cost savings and to help support the use of renewable fuels. However, unless your current permit has language that pre-approves the use of the specific fuel you want to add, you will most likely need a major permit amendment before you can start using this fuel. Also, if you want to do a test burn to determine the compatibility of the fuel with your existing system, you will most likely need a major amendment unless your current permit specifically authorizes such an activity. In your planning process to do either a test burn or a fuel switch, you should allow at least 6 months for the permitting process to be completed. Use the Change/Modification application forms to submit permit amendments. These forms are available on the MPCA web (<http://www.pca.state.mn.us/air/permits/forms.html#2>). If you cannot wait that long, please refer to the forms available at the MPCA web site (<http://www.pca.state.mn.us/air/permits/forms.html#8>). Use the Expedited Permit forms to submit a request for an expedited review of your application. Please contact Don Smith at 651-296-7625 should you have further questions.

2. Environmental Bulletin

The most recent Environmental Bulletin addresses volatile organic compound emissions from dry mill ethanol production. The MPCA's Environmental Bulletin Series is designed to highlight environmental outcomes and results of scientific studies the MPCA and its partners conduct in air, water and waste management. The abstract and a description of the study's methods, results, conclusions and references, are included in each issue of the bulletin. To read the most recent issue as well as past issues, go to:  
<http://www.pca.state.mn.us/publications/environmentalbulletin/index.html>

October 25, 2006

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

#### 1. Environmental Review Rules Phase 1 Changes

Environmental Review Rules Phase 1 changes have been published in the State Register. The rules will be effective October 30th.

Information about the revisions are available on the web at  
<<http://www.eqb.state.mn.us/project.html?Id=18343>>

The changes that affect MPCA thresholds are:

For the Air Pollution category, the threshold is changing from 100 tons per year (tpy) to 250 tpy. There is no longer a mandatory category for parking facilities.

For the Wastewater Systems category, the threshold is changing as follows: for new or expanding facilities, the threshold will change from 50,000 gallons per day (gpd) to 200,000 gpd (keeping the 50% for expansions); for sewer extensions, the threshold will change from 1,000,000 gpd to 2,000,000 gpd for those projects that feed into a wastewater treatment facility with capacity of 20,000,000 gpd or greater.

Fuel Conversion Facilities EIS threshold will change to 125 million gallons per year based on the legislation.

Please direct questions about general environmental review to Gregg Downing at 651/201-2476 or Jon Larsen at 651/201-2477. Specific MPCA questions, please direct questions to Susan Heffron at 651/297-1766.

August 29, 2006

Greetings Air Quality Technical Information subscribers -

One Listserv items for today:

1. Evaluation of the Air Emissions Risk Analysis Process

MPCA staff are planning to conduct an internal evaluation of the Air Emissions Risk Analysis (AERA) process. As part of our preparation, we are soliciting input from others. The objective of this upcoming evaluation will be to review the AERA process, identify what works and what doesn't, and then use that information to improve the process.

At the end of the evaluation, we will identify and prioritize those areas to address in the upcoming months. Please forward your comments on the effectiveness and use of the AERA to [aera@pca.state.mn.us](mailto:aera@pca.state.mn.us) <<mailto:aera@pca.state.mn.us>>. We would appreciate hearing from you by October 4, 2006.

Thanks in advance for your help!

December 27, 2005

Greetings Air Quality Technical Information subscribers -

5 Listserv items for today:

1. MPCA Response to Comments on Proposed BART Strategy
2. EPA Delists MEK from HAP list
3. New MPCA Web Page on Regional Haze
4. Exemption of Certain Area Sources From Title V Operating Permit Programs
5. Air Emissions Breakdown/Shutdown Notification Form

1. MPCA Response to Comments on Proposed BART Strategy

The MPCA's response to comments on its proposed Best Available Retrofit Technology (BART) strategy to address regional haze is now available on-line at: <http://www.pca.state.mn.us/publications/aq-sip2-04.pdf>

In addition, the MPCA has drafted BART analysis guidance for the dozen or so facilities that must complete a BART analysis. Comments on the draft guidance are requested by January 6, 2005. If you are interested in receiving a copy of the draft BART analysis guidance, please contact Mary Jean Fenske at [mary.jean.fenske@state.mn.us](mailto:mary.jean.fenske@state.mn.us).

2. EPA Delists MEK from HAP List

EPA has decided to remove methyl ethyl ketone (MEK) from the list of hazardous air pollutants (HAPs) under Section 112. MEK, which is a solvent used in producing vinyl lacquers, adhesives, magnetic tapes, printing inks, cleaning fluids, perfumes and other products, will continue to be regulated as a volatile organic compound. EPA determined that exposures to MEK "may not reasonably be anticipated to cause human health or environmental problems." On June 20, 2005, EPA announced that it had removed the requirement for companies to report MEK emissions to the agency's Toxic Release Inventory. For additional information, see [www.epa.gov/ttn/oarpg/t3/fact\\_sheets/mek\\_fs.html](http://www.epa.gov/ttn/oarpg/t3/fact_sheets/mek_fs.html) Minnesota Pollution Control Agency will be evaluating how this affects sources that fall under a major source due to the HAP, MEK.

### 3. New MPCA Web Page on Regional Haze

A new web page on Regional Haze is now available to the public on the Minnesota Pollution Control Agency's website:

<http://www.pca.state.mn.us/air/regionalhaze.html>. This website contains information related to BART (Best Available Retrofit Technology) as well.

### 4. Exemption of Certain Area Sources From Title V Operating Permit Programs

The U.S. Environmental Protection Agency has issued the final rule exempting area sources from Title V operating permit program for five categories of nonmajor (area) sources that are subject to National Emission Standards for Hazardous Air Pollutants (NESHAP). The five categories are the dry cleaners, chrome electroplaters, ethylene oxide sterilizers, halogenated solvent degreasers, and secondary aluminum smelters. More information is available in the Federal Register:

<http://www.epa.gov/fedrgstr/EPA-AIR/2005/December/Day-19/a24072.htm>

### 5. Air Emissions Breakdown/Shutdown Notification Form

Information about the requirement to report air emissions breakdown/shutdowns, Minn. Rule 7019.1000, Notification of Deviations Which Endanger Human Health or the Environment; Shutdowns and Breakdowns, is now available on the MPCA web: <http://www.pca.state.mn.us/air/emissionsnotice.html>

Forms to notify the MPCA about shutdown/breakdown events or an electronic notification are available at the above web page.

October 11, 2005

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Draft Best Available Retrofit Technology (BART) Modeling Protocol Now Available
2. Clean Air Interstate Rules (CAIR) and Clean Air Mercury Rules (CAMR) Web Page

1. Draft Best Available Retrofit Technology (BART) Modeling Protocol Now Available

The MPCA has prepared a draft protocol for the modeling it will perform to determine which facilities are subject to BART. The MPCA is requesting comments on the modeling protocol by October 21, 2005. If you are interested in receiving a copy of the BART modeling protocol, please e-mail Mary Jean Fenske at [maryjean.fenske@state.mn.us](mailto:maryjean.fenske@state.mn.us)

The MPCA intends to perform modeling in November to determine which of the 25 BART-eligible facilities in Minnesota cause or contribute to visibility impairment in Voyageurs National Park, the Boundary Waters Canoe Area, and other Class I areas. Those facilities that contribute significantly to visibility impairment are "subject to BART" and will be required to perform a BART determination. A BART determination is an engineering analysis to determine an emissions limitation taking five factors into consideration.

For more information about the MPCA's proposed BART strategy, look under September 06, 2005 at <http://www.pca.state.mn.us/news/data/index.cfm?PN=1>

2. Clean Air Interstate Rules (CAIR) and Clean Air Mercury Rules (CAMR) Web Page

The MPCA web has information about the CAIR and CAMR Rules. The following is a link to the web page: <http://www.pca.state.mn.us/air/rulechange-cair-camr.html>

A Stakeholder meeting was held on September 7, 2005. The material presented at this meeting is available at the web link above.

September 8, 2005

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

1. Public Notice Of Proposed Best Available Retrofit Technology Strategy For Minnesota To Address Regional Haze

On September 6, the Minnesota State Register published a notice requesting comments on a proposed strategy outlining the MPCA's intent to implement Environmental Protection Agency's (EPA's) Guidelines for Best Available Retrofit Technology (BART) for qualifying sources in Minnesota. EPA's BART Guidelines provide each state with discretion in the application of BART. The proposed "BART Strategy for Minnesota" outlines the MPCA's intent in each area of the Guidelines where a state is offered options. The notice asks for comment on the BART Strategy. BART implementation is a required element of the Regional Haze state implementation plan due to U.S. EPA by December 2007.

To view the notice and proposed BART Strategy for Minnesota go to:

<http://www.pca.state.mn.us/news/data/index.cfm?PN=1>

July 29, 2005

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

#### 1. Facilities Asked to Identify BART-Eligible Sources

On July 28<sup>th</sup>, the MPCA mailed a Request for Information to about 140 facilities that are major sources under New Source Review, asking them to identify any emission units that may potentially be subject to Best Available Retrofit Technology (BART) under the federal regional haze rule. The MPCA estimates a few dozen facilities in Minnesota may have BART-eligible units. For an emission source to be considered eligible for BART, it must fall into one of 26 specified categories, must have the potential to emit of at least 250 tons per year of certain haze-forming pollutants, and must have been in existence on August 7, 1977, but not in operation before August 7, 1962.

To meet the Clean Air Act's requirements, the U.S. EPA published regulations to address visibility impairment in our nation's largest national parks and wilderness ("Class I") areas in July 1999. This rule is commonly known as the "regional haze rule" [64 Fed. Reg. 35714 (July, 1999)] and is found in 40 CFR part 51, in §§ 51.300 through 51.309. Under EPA's 1999 regional haze rule certain emission sources, "that may reasonably be anticipated to cause or contribute" to visibility impairment in downwind Class I areas, are required to install BART. On July 6, 2005 EPA published a revised final rule, including Appendix Y to 40 CFR part 51 "Guidelines for BART Determinations Under the Regional Haze Rule."

Within its boundary, Minnesota has two Class I areas: the Boundary Water Canoe Area Wilderness and Voyageurs National Park. Minnesota must develop a state implementation plan that contains enforceable measures and strategies for reducing visibility-impairing pollution in its two Class I areas, including the BART determinations and the resulting emissions limitations. The identification of BART-eligible sources is the first step in the BART implementation process.

You can view a copy of the Request for Information at:

<http://www.pca.state.mn.us/air/criteria-emissioninventory.html>



July 7, 2005

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

1. Training Opportunity - Central States Air Resource Agencies (CenSARA) is offering a course entitled Inspection of Gas Control Devices & Selected Industries in St. Paul on July 19-21, 2005

The course is free for government employees and \$250 for others. Information on the course is included below. Additional information, online registration, and contact information for questions can be found on the CenSARA website at <http://www.censara.org/training.asp#>

Inspection of Gas Control Devices & Selected Industries  
July 19-21, 2005  
Holiday Inn St. Paul East  
2201 Burns Avenue  
St. Paul, MN 55119  
651-731-2220

Course Director: Jerry Crowder, Ph.D., PE

Length: 2.5 days

**Benefits:**

This course is an extension of Basic Source Inspection Techniques, Level I. Site-specific information is used to identify shifts in the operating variables affecting emissions from control equipment and significant industrial processes. The inspection approach and the inspection techniques for particle control devices are reviewed. Operating principles and inspection techniques for general gaseous emission control devices (absorbers, adsorbers, incinerators and condensers) and specific control applications (flue gas desulfurization and nitrogen oxide control systems) are presented. Process descriptions and inspection issues are also discussed for fossil fuel fired boilers, waste incinerators, metallurgical processes and asphalt plants. Written and video case studies are used to reinforce the material.

**Intended Audience:**

Public and private sector inspectors, plant engineers and safety and industrial hygiene personnel.

**Desired Background:** Completion of Basic Source Inspection Techniques.

Course Topics:

- General Inspection Procedures
- Particle Control Devices
- Gaseous Emission Control Devices
- Flue Gas Desulfurization Systems
- Nitrogen Oxide Control Systems
- Fossil Fuel Fired Boilers
- Waste Incinerators
- Metallurgical Processes
- Asphalt Plants

March 30, 2005

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Boiler NESHAP Implementation and Enforcement
  2. Two Optional Tools Available to Estimate Ambient Air Concentrations
- 
1. NESHAP FOR INDUSTRIAL/COMMERCIAL/INSTITUTIONAL BOILERS AND PROCESS HEATERS

The MPCA has not accepted delegation for the implementation and enforcement of the industrial boiler NESHAP, 40 CFR Part 63, Subpart DDDDD, titled "National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters" ("industrial boiler MACT"). Therefore, the EPA remains responsible for overseeing stack testing, reviewing stack test results, determining compliance and initiating enforcement actions.

Although the EPA is the primary authority for this standard, the MPCA should be copied on all test plans and reports according to Minn. R. 7017.2020. Permittees are still responsible for demonstrating compliance with state regulations to the MPCA. Also, if a facility is testing for applicability of the Boiler NESHAP, the MPCA remains the responsible agency. For instance, if a facility is testing to meet Title I conditions that allow them to remain a minor source with regard to the Boiler NESHAP, they should coordinate performance testing with the MPCA. The MPCA will review the stack test and issue a Notice of Compliance, provided the testing was completed properly.

Information about the Boiler NESHAP can be found on EPA's website at:  
<<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>>

Call the MPCA's Customer Assistance Center at 651-297-2274 (Metro area and outside Minnesota) or 1-800-646-6247 (in Minnesota only) with additional questions.

## 2. TWO OPTIONAL TOOLS AVAILABLE TO ESTIMATE AMBIENT AIR CONCENTRATIONS

The MPCA has developed two screening tools that can be used to gauge how a facility's emissions impact the quality of the air nearby the facility. The Capped Air Permit Spreadsheet or CAPS

(<http://www.pca.state.mn.us/air/permits/caps.xls>) is a very simple Excel spreadsheet that can generate ambient air impact estimates for a total facility, or even a single emissions unit for three key criteria pollutants. The Risk Analysis Screening Spreadsheet or RASS (<http://www.pca.state.mn.us/air/aera-risk.html>) is more complicated because it evaluates a broad selection of chemicals, including all criteria pollutants and hazardous air pollutants, but calculates impacts in a similar manner.

The CAPS was developed by the MPCA to specifically estimate short-term concentrations of SO<sub>2</sub> and PM<sub>10</sub> and annual emissions of NO<sub>x</sub> for facilities applying for a state capped emissions permit. However, CAPS can be used by any facility to quickly estimate ambient concentrations at the property line by entering:

- hourly emissions from each stack for short-term standard evaluation and yearly emissions for annual standard evaluation,
- the height of each stack, and
- distance from the stack to the property line.

Using dispersion factors built into the spreadsheet, CAPS estimates the concentration of SO<sub>2</sub>, PM<sub>10</sub> and NO<sub>x</sub> at the property line as a fraction of ambient air quality standard. CAPS also allows a user to develop dispersion factors specific to their facility by running a separate program using additional site-specific data, although a consultant's assistance may be necessary.

CAPS and RASS are screening tools and are not used to demonstrate compliance with an ambient air quality standard, although they may indicate that a compliance problem exists. A more comprehensive modeling evaluation using approved EPA dispersion models is needed to determine modeled compliance with ambient air quality standards.

The MPCA believes that by making these tools available directly to facilities, facilities can make a preliminary evaluation of the impacts of adding new equipment or changing equipment without having full-blown air dispersion modeling done. If the screening level modeling shows a potential problem or raises concerns, facilities should consider performing more refined modeling.

March 7, 2005

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. 2005 Air Quality Legislative Report Now Available
2. March 12 Initial Notification Deadline for Industrial, Commercial and Institutional Boiler NESHAP

1. 2005 AIR QUALITY LEGISLATIVE REPORT NOW AVAILABLE

The MPCA's 2005 legislative report, "Air Quality in Minnesota: Progress and Priorities," describes air quality trends in Minnesota and priority activities for the next few years. In addition, it provides a progress report on the partnerships and voluntary initiatives introduced in the MPCA's 2003 air quality legislative report. View the report at <http://www.pca.state.mn.us/publications/reports/lraq-1sy05.pdf>

2. MARCH 12 INITIAL NOTIFICATION DEADLINE FOR INDUSTRIAL, COMMERCIAL AND INSTITUTIONAL BOILER NESHAP

The initial notification deadline for the boiler NESHAP is due to EPA on March 12. Affected facilities can use the MPCA form at [www.pca.state.mn.us/publications/forms/aq-f5-ddddd01.doc](http://www.pca.state.mn.us/publications/forms/aq-f5-ddddd01.doc), the initial notification form on the EPA website at [www.epa.gov/ttn/atw/boiler/initialnote9\\_13\\_04.pdf](http://www.epa.gov/ttn/atw/boiler/initialnote9_13_04.pdf), or can choose their own format to provide the information.

The NESHAP affects boilers or process heaters located at a major source of HAPs. Existing small units at major HAP sources, defined as boilers under 10 MMBtu/hr., have no emission limits and no requirements. Any water tube boiler or process heater greater than 10 MMBtu/hr must at least file an initial notification to both the EPA and the MPCA.

The boiler NESHAP is complex and is affected by rated heat input, fuel type, and utilization. If you have a boilers or process heater located at a major HAP source, visit [www.epa.gov/ttn/atw/boiler/boilerpg.html](http://www.epa.gov/ttn/atw/boiler/boilerpg.html) which contains the rule, applicability flow charts, fact sheets, an easy-to-understand brochure and other items.

Initial notification forms should be postmarked no later than March 12. Submit one copy to EPA and one to MPCA. Send to:

Mr. George Czerniak, Chief  
Air Enforcement & Compliance Assurance Branch  
EPA Region V  
77 West Jackson Boulevard  
Chicago, IL 60604

And:

Compliance Tracking Coordinator  
Industrial Division/5th Floor  
Minnesota Pollution Control Agency  
520 Lafayette Road North  
St. Paul, Minnesota 55155-4194

For questions about the NESHAP, call the MPCA's Customer Assistance Center at 651/297-2274 (Metro and outside Minnesota) or 1-800-646-6247 (in Minnesota only).

February 25, 2005

Greetings Air Quality Technical Information subscribers -

One Listserv item for today:

## 1. Rulemaking Process Begins

### 1. RULEMAKING PROCESS BEGINS

The MPCA is beginning a rulemaking process that will affect facilities operating under the state's air quality rules. The rulemaking will address the following areas:

- \* Minor changes needed to be consistent with federal New Source Review reform (large facilities)

- \* Revisions to the Control Equipment rule

- \* Revisions to the Option C Registration Permit rule and minor revisions to other registration permit rules

- \* Proposed rule to meet federal requirements for Best Available Retrofit Technology implementation (large facilities)

- \* Proposed "Omnibus" rule changes to update, clarify, and correct existing air quality rules.

The rulemaking process is expected to last about a year.

A "Request for Comment," published in the Minnesota State Register on February 22, provides more details about the rulemaking and comment process. Go to "Public Notices" at: <http://www.pca.state.mn.us/news/index.html>

The MPCA welcomes questions, comments and suggestions, and will provide updates, including drafts and notices of informal meetings. Send your name and e-mail address to:

Stuart Arkley at: [stuart.arkley@pca.state.mn.us](mailto:stuart.arkley@pca.state.mn.us) or (651) 296-7774.

December 29, 2004

Greetings Air Quality Technical Information subscribers -

Two Listserv items for today:

1. Industrial, Commercial, Institutional Boiler NESHAP
2. Archived Air-Tech-Info Articles

1. Industrial, Commercial, Institutional Boiler NESHAP

EPA has promulgated federal regulation 40 CFR Part 63 Subpart DDDDD, the Industrial, Commercial, Institutional Boilers and Process Heaters NESHAP (the "Boiler MACT"). It affects existing and new boilers and process heaters. The standard is effective November 12, 2004.

All notices and submittals required by the standard will need to be submitted to EPA Region V, including a facility's initial notification required by the standard, because the MPCA is not accepting delegation from EPA of the implementation or enforcement of the standard. Owners of boilers or process heaters affected by the Boiler MACT will need to provide initial notification to EPA by March 12, 2005. To use a standardized notification form, go to :

<<http://www.pca.state.mn.us/air/permits/forms.html#5e>>

When a state like Minnesota does not accept delegation of a standard, it means that EPA remains responsible for interpreting provisions of the standard, overseeing stack testing, reviewing stack test results, determining compliance and initiating enforcement actions. The Boiler MACT is an applicable requirement; therefore the MPCA will include the standard's emission limits and the related testing, recordkeeping and reporting requirements in Title V permits. EPA may choose to conduct its own inspections. MPCA staff will notify EPA if potential violations are identified during the MPCA's inspections.

While EPA will remain the main enforcement authority for this standard, Minn. R. 7017.2020 requires that Permittees must submit test plans and stack test results to the MPCA. Permittees should coordinate submittals of these documents that are required for compliance with the Boiler MACT, making sure that both EPA and the MPCA are provided with copies. Affected facilities will need to ensure that pretest notifications required by the Boiler MACT are submitted to both EPA and the MPCA at least 30 days prior to the scheduled test.

Information about the Boiler MACT can be found at:

<<http://www.epa.gov/ttn/atw/boiler/boilerpg.html>>

Questions? Call the MPCA's Customer Assistance Center at 651-297-2274 or 1-800-646-6247.

2. Archived Air-Tech-Info Articles

Previous emails are available under the section "Archives" located on the MPCA Web site at: <<http://www.pca.state.mn.us/air/air-techinfo.html>>



November 29, 2004

Greetings Air Quality Technical Information subscribers -

Four Listserv items for today:

1. Permit Application Forms Reminder
2. New CH-00 Form
3. New State Permit Options Available December 6<sup>th</sup>
4. Implementing the Industrial Boiler NESHAP

1. Permit Application Forms Reminder

New permit application forms replaced the old MOD forms in early 2004. The new forms are referred to as the "CH forms" (since all form numbers begin with "CH"). They should be used for submittals related to making changes or modifications to a facility (<http://www.pca.state.mn.us/air/permits/forms.html#2>). The new CH forms reflect rule changes and have clearer instructions on what forms and information are required for different types of submittals. The CH forms are routinely updated. Additional types have even been added since the new CH forms were posted on the web in March 2004.

Starting in December 2004, we will begin notifying facilities using the old forms that any future submittals must be on the new CH forms. Submittals after that will be returned if they are on the old MOD forms. We encourage you to check the MPCA's Web site (<http://www.pca.state.mn.us/air/permits/forms.html#2>) for the most current forms prior to beginning work on any new submittal.

2. New CH-00 Form

You may have noticed that a new form was added to the CH forms on the MPCA Web site (<http://www.pca.state.mn.us/air/permits/forms.html#2>). The new form, CH-00 Project Screening, will be used by the MPCA when assigning permit applications to permit staff. As part of broader permit processing improvements, the MPCA intends to screen all permit amendment applications for the purpose of project assignment, to better match staff experience and workload with individual projects.

We encourage you to check the Web page above for the most current forms prior to beginning work on any new submittal.

### 3. New State Permit Options Available December 6<sup>th</sup>

A rule creating two new state permit options will be published in the State Register on November 29 and effective on December 6, 2004.

**Capped Emission Permit.** The “capped emission permit” option is a rule-based permit in which all requirements are contained in rule rather than a tailored permit document. This option allows eligible facilities that comply with requirements and have emissions no greater than 90 percent of federal permitting thresholds to make physical and operational changes without need for advance MPCA approval or permit amendment. This option is designed for non-complex facilities that do not require site-specific permit conditions. For more information go to: <http://www.pca.state.mn.us/air/permits/capped.html>

**EMS-Based Permit.** The second option is a “state permit with EMS provisions,” designed for air emission facilities that employ a qualifying environmental management system (EMS) as a tool to improve environmental compliance and performance. This EMS-based permit allows qualifying facilities to operate under emission caps set in individually-issued state permits, with reduced recordkeeping and without the need for advance approval of certain facility changes. For more information about this option, contact Al Innes at (651) 296-7330.

### 4. Implementing the Industrial Boiler NESHAP

On September 13, 2004, EPA finalized the National Emission Standard for Hazardous Air Pollutants (NESHAP) rule for Industrial/ Commercial/Institutional Boilers and Process Heaters. Initial notifications of NESHAP applicability are due by March 12, 2005. The MPCA will place a notification form on its Web site by December 1.

Based on responses from an earlier notification, the MPCA expects that more than a hundred facilities may be subject to this NESHAP. The rule requires annual stack testing of PM-10, HCl, and mercury emissions for each of the first three years for boilers burning solid fuels. It is not likely that the MPCA will accept delegation for this NESHAP initially, because the MPCA does not have the resources to manage the risk-exemption process allowed by the rule, nor the stack-testing components. In addition, some parties have challenged some of the legal and technical aspects of the rulemaking which may take a few years to resolve. The MPCA may be able to accept delegation at a later date. EPA's Web site has more information about this rule: <http://www.epa.gov/ttn/atw/boiler/boilerpg.html>