

AIR EMISSION PERMIT NO. 10900084 - 001

IS ISSUED TO

Mayo Foundation
for
Mayo Clinic – Rochester, MN
200 First Street Southwest
Rochester, Olmsted County, MN 55905

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

| | |
|---------------------------------|--------------------------|
| Permit Type | Application Date |
| Total Facility Operating Permit | 12/15/95, revised 2/3/04 |

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

Permit Type: Federal; Pt 70/Major for NSR

Issue Date: November 24, 2004

Expiration: November 24, 2004
All Title I Conditions do not expire.

Conditions stating “Title I Condition: State Implementation Plan (SIP) for SO₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP” or “Title I Condition: Minnesota SIP; 40 CFR § 50.5” are required to go through the federal State Implementation Plan approval process before the change becomes effective.

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| | Richard J. Sandberg, Manager Air Quality Permits Section Industrial Division |
| for | Sheryl A. Corrigan Commissioner Minnesota Pollution Control Agency |

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

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

FACILITY DESCRIPTION:

Mayo Clinic is a health care facility located in Rochester, Minnesota. The "facility" permitted in this document includes all buildings owned and/or operated by Mayo Foundation in downtown Rochester, Minnesota, located on contiguous property with the Franklin Heating Station, Rochester Methodist Hospital, and the Prospect Utility Plant.

The primary emission units at the facility consist of boilers fired on No. 6 fuel oil, No. 2 fuel oil, and/or natural gas, two paint booths (one of which can accommodate wood and metal sanding operations), diesel-powered generators, and cooling towers.

While Mayo Clinic – Rochester, MN is owned and operated by the Mayo Foundation, it is not contiguous with other Mayo facilities in Rochester (ie., Saint Marys Hospital and the Waste Management Facility), and thus is a separate source under the New Source Review and Part 70 regulations. This permit is a Part 70 operating permit. The facility is an existing major source under New Source Review. No new modifications are approved through this permit (a previously approved modification to Boiler No. 2 at the Franklin Heating Station is included in the permit). The facility is not a major source of HAP emissions, by virtue of accepting a synthetic minor limit.

The facility is located in an area that was previously designated as non-attainment for SO₂. However, the area currently meets the ambient air quality standards, and was officially redesignated as "attainment" on May 8, 2001. The facility has been subject to a federally enforceable permit (part of Minnesota's state implementation plan, or SIP, for attaining ambient air quality standards) containing requirements contributing to the correction of the non-attainment problem and the ultimate redesignation. The requirements of that permit have been incorporated into this permit as non-expiring Title I conditions. This permit will ultimately replace the existing permit and be incorporated into the SIP (separately from the permit issuance process).

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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

Subject Item: Total Facility

| What to do | Why to do it |
|--|--|
| DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NEW SOURCE REVIEW | hdr |
| <p>These requirements apply where there is a reasonable possibility that a proposed project analyzed using the actual-to-projected-actual (ATPA) test and found to not be part of a major modification may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project.</p> <p>Please be advised that although you may determine that a modification is not subject to new source review, prior to beginning actual construction on the project, a permit amendment, recordkeeping, or notification may still be required under Minn. R. 7007.1150 - 7007.1500.</p> | Title I Condition: 40 CFR Section 52.21(r)(6) |
| <p>Before beginning actual construction on a project involving equipment other than electric utility steam generating units (EUSGUs) the Permittee shall document and maintain a record of the following information:</p> <ol style="list-style-type: none"> 1. A description of the project 2. Identification of the emission unit(s) whose emissions could be affected 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded that were due to increases not associated with the modification and that the unit could have accommodated prior to the modification. | Title I Condition: 40 CFR Section 52.21(r)(6) |
| <ol style="list-style-type: none"> 4. The Permittee shall monitor, from any non-EUSGU associated with the project, the actual emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using the ATPA test, and the potential emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using potential emissions. The Permittee shall calculate and maintain a record of the sum of the actual and potential emissions (if used in the analysis) of the regulated pollutant, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit that regulated NSR pollutant. | continued from above |
| <ol style="list-style-type: none"> 5. The Permittee must submit a report to the Agency if the annual summed (actual plus potential, if applicable) emissions exceed the projected values. Such report shall be submitted to the Agency within 60 days after the end of the year. The report shall contain: <ol style="list-style-type: none"> a. The name, address and telephone number of the facility b. The annual emissions (actual plus potential, as applicable, for each pollutant exceeding the preconstruction projection) c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection | continued from above |
| OPERATING REQUIREMENTS | hdr |
| Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted. | Minn. R. 7011.0020 |
| Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A. | Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J) |
| Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation. | Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J) |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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|---|---|
| Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate. | Minn. R. 7019.1000, subp. 4 |
| Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150. | Minn. R. 7011.0150 |
| Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act. | Minn. R. 7030.0010 - 7030.0080 |
| Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A). | Minn. R. 7007.0800, subp. 9(A) |
| In the case of a conflict between an applicable requirement and the language of a permit term based on that applicable requirement, the underlying requirement supersedes any conflicting or otherwise non-conforming permit term language. | Minn. R. 7007.0800, subp. 2 |
| The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16. | Minn. R. 7007.0800, subp. 16 |
| PERFORMANCE TESTING | hdr |
| Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C. | Minn. R. ch. 7017 |
| Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018. | Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2 |
| MONITORING REQUIREMENTS | hdr |
| Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit). | Minn. R. 7007.0800, subp. 4(D) |
| Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system. | Minn. R. 7007.0800, subp. 4(D) |
| RECORDKEEPING | hdr |
| Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A). | Minn. R. 7007.0800, subp. 5(C) |
| This permit shall not alter or affect the liability of an owner or operator for any violation of applicable requirements prior to or at the time of permit issuance. | Minn. R. 7007.1800(C)(2) |
| Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes. | Minn. R. 7007.0800, subp. 5(B) |
| REPORTING/SUBMITTALS | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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|---|---|
| <p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p> | Minn. R. 7019.1000, subp. 3 |
| <p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p> | Minn. R. 7019.1000, subp. 2 |
| <p>Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.</p> | Minn. R. 7019.1000, subp. 1 |
| <p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. | Minn. R. 7019.1000, subp. 1 |
| <p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p> | Minn. R. 7007.1150 through Minn. R. 7007.1500 |
| <p>Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).</p> | Minn. R. 7007.1400, subp. 1(H) |
| <p>Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.</p> | Minn. R. 7019.3000 through Minn. R. 7019.3100 |
| <p>Emission Fees: due 60 days after receipt of an MPCA bill.</p> | Minn. R. 7002.0005 through Minn. R. 7002.0095 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 001 Boilers 1, 2, 3 & 4 Franklin

Associated Items: EU 024 Boiler 1 - Franklin

EU 025 Boiler 2 - Franklin

EU 026 Boiler 3 - Franklin

EU 027 Boiler 4 - Franklin

SV 004 Boilers Stack - Franklin

| What to do | Why to do it |
|--|--|
| Amendments to Title I Conditions: If any permit requirement cited as "Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP" is amended, the amendment must first comply with procedures of Minn. R. 7007.0850 (Permit Application Notice and Comment) and Minn. R. 7007.0950 (EPA Review and Objection) applicable to major amendments to Part 70 permits. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| EMISSION AND OPERATING LIMITS - APPLY WITH OR WITHOUT CEMS USE | hdr |
| <p>Sulfur Dioxide: less than or equal to the amount specified by the following equation when natural gas and fuel oil are combusted simultaneously (applies to EU024, EU026 and EU027)</p> $W = 2Y / (X + Y) = 2Y/100 = 0.02Y$ <p>where: W = emission limit for sulfur dioxide, lbs/million Btu heat input 2 = allowable SO₂ emission limit for liquid fossil fuels Y = percentage of total heat input from liquid fossil fuel X = percentage of total heat input from gaseous fossil fuels</p> | Minn. R. 7011.0505, subp. 3(A) |
| <p>Fuel Types Allowed: Emission Units 024, 026, and 027 (Boilers No. 1, 3, and 4) are allowed to burn natural gas, No. 6 fuel oil and No. 2 fuel oil. Emission Unit 025 (Boiler 2) is limited to natural gas and No. 2 fuel oil. No. 2 fuel oil and No. 6 fuel oil usage rates for Group 001 shall be measured by fuel flow meters. Hourly usage rates of No. 2 and No. 6 fuel oil shall be individually recorded, each hour that any fuel oil is combusted.</p> <p>The Permittee is authorized to install piping, pumps and related equipment so that No. 2 fuel oil stored in existing 4000 or 150,000 gallon tanks can be used as fuel in any of the emission units in this Group.</p> | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| <p>Fuel Usage: No. 2 fuel oil may be used in Emission Units 024, 026, and 027 (Boilers No. 1, 3, and 4) only under the following conditions when No. 6 fuel oil would otherwise be used:</p> <ol style="list-style-type: none"> During natural gas curtailment During maintenance or modification of the natural gas supply lines and equipment During complete interruption of natural gas service by the gas provider due to failure or emergency maintenance During gas meter testing During systems testing and fireman's training During maintenance of or in the event of the No. 6 fuel oil storage tanks and transfer system. <p>The Permittee shall maintain a record of all occurrences of No. 2 fuel oil combustion in the fireman's log including the date, time and reason for the use of No. 2 fuel oil.</p> | 40 CFR Section 51.165(a)(1)(v)(C)(8) and (a)(1)(xxv) and interpretive memorandum (7/1/94); Pollution Control Project exempt from NSR; Minn. R. 7007.0800, subp. 4(C) and subp. 5 |
| SO ₂ EMISSION LIMITS - NO CEMS | hdr |
| Sulfur Dioxide: less than or equal to 232 lbs/hour and less than or equal to the amount determined by Regression Equation 1 (Appendix B), as a 1-hour Average, when the diesel engines in GP 006 are burning diesel fuel. | Minn. R. 7009.0020 |
| Sulfur Dioxide: less than or equal to 285 lbs/hour and less than or equal to the amount determined by Regression Equation 2 (Appendix B), as a 1-hour Average, when the diesel engines in GP 006 are not burning diesel fuel. | Minn. R. 7009.0020 |
| Sulfur Dioxide: less than or equal to 325 lbs/hour and less than or equal to the amount determined by Regression Equation 3 (Appendix B), as a 3-hour block Average, when the diesel engines in GP 006 are burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Sulfur Dioxide: less than or equal to 400 lbs/hour and less than or equal to the amount determined by Regression Equation 4 (Appendix B), as a 3-hour block Average, when the diesel engines in GP 006 are not burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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| Sulfur Dioxide: less than or equal to 209 lbs/hour and less than or equal to the amount determined by Regression Equation 5 (Appendix B), as a 24-hour block Average, when the diesel engines in GP 006 are burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Sulfur Dioxide: less than or equal to 258 lbs/hour and less than or equal to the amount determined by Regression Equation 6 (Appendix B), as a 24-hour block Average, when the diesel engines in GP 006 are not burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| ALTERNATE LIMITS - APPLY WHEN SO2 CEMS IS USED | hdr |
| If the Permittee decides to install CEMs for SO2 and stack gas flowrate, the requirements in this section replace the requirements described above under "SO2 EMISSION LIMITS - NO CEMS" for establishing the limit on SO2 emissions. | Minn. R. 7007.0800, subp. 2 |
| If the Permittee decides to install CEMs for SO2 and stack gas flowrate, the Permittee shall provide a demonstration of the correctness of the calculation of the regression equations to the MPCA. This demonstration may be coordinated with the CEM certification test required by this permit. | Minn. R. 7007.0800, subp. 2 |
| CEMS Installation: Install, maintain, calibrate, and operate a SO2 continuous monitoring system which measures and records emissions in units of the standard. | Minn. R. 7007.0800, subp. 2 |
| Sulfur Dioxide: less than or equal to 232 lbs/hour and less than or equal to the amount determined by Regression Equation 7 (Appendix B), as a 1-hour Average, when the diesel engines in GP 006 are burning diesel fuel. | Minn. R. 7009.0020 |
| Sulfur Dioxide: less than or equal to 285 lbs/hour and less than or equal to the amount determined by Regression Equation 8 (Appendix B), as a 1-hour Average, when the diesel engines in GP 006 are not burning diesel fuel. | Minn. R. 7009.0020 |
| Sulfur Dioxide: less than or equal to 327 lbs/hour and less than or equal to the amount determined by Regression Equation 9 (Appendix B), as a 3-hour Average, when the diesel engines in GP 006 are burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Sulfur Dioxide: less than or equal to 401 lbs/hour and less than or equal to the amount determined by Regression Equation 10 (Appendix B), as a 3-hour Average, when the diesel engines in GP 006 are not burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Sulfur Dioxide: less than or equal to 209 lbs/hour and less than or equal to the amount determined by Regression Equation 11 (Appendix B), as a 24-hour Block Average, when the diesel engines in GP 006 are burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Sulfur Dioxide: less than or equal to 258 lbs/hour and less than or equal to the amount determined by Regression Equation 12 (Appendix B), as a 24-hour Block Average, when the diesel engines in GP 006 are not burning diesel fuel. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| RECORDKEEPING REQUIREMENTS - NO CEMS | hdr |
| Recordkeeping Requirements: The Permittee shall retain the following records for 5 years: 1) Calculations of the percent load on an hourly basis; 2) Calculations of the allowable hourly SO2 emission rate and the actual emission rate; 3) Calculations of the allowable 3-hour SO2 emission rate and the actual emission rate; 4) Calculations of the allowable 24-hour (calendar day) SO2 emission rate and the actual emission rate; and 5) Fuel supplier certifications and/or fuel sampling records. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP Minn. R. 7007.0800, subp. 5 |
| Recordkeeping: The Permittee shall calculate the actual SO2 emission rate in lbs per hour using the following equation: Lbs SO2/hour = (2 x A x B x C) + (2 x D x E x F) where: 2 = lb of SO2 per lb S A = lb of sulfur per lb of No. 6 fuel oil B = gallons of No. 6 fuel actually burned per hour C = density of the No. 6 fuel in lb/gal D = lb of sulfur per lb of No. 2 fuel oil E = gallons of No. 2 fuel actually burned per hour F = density of the No. 2 fuel in lb/gal | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Each hour, the Permittee shall calculate and record the lbs/hour SO2 emission limit from the regression equation and the actual lbs/hour SO2 emissions. These records shall be readily accessible at all times. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Percent Load: The Permittee shall calculate % Load from Equation 1 in Appendix B. If the calculated percent Load is greater than 100, the Permittee shall use 100 in the regression equations to determine the lbs/hour SO2 limit. This ensures that the SO2 emission limit (in lbs/hour) will not exceed the modeled emission levels that demonstrated modeled compliance with ambient standards. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| RECORDKEEPING REQUIREMENTS - APPLY WHEN USING SO2 CEMS | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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| If the Permittee decides to install CEMs for SO ₂ and stack gas flowrate, the requirements in this section replace the requirements described above under "RECORDKEEPING REQUIREMENTS - NO CEMS" for keeping records regarding SO ₂ emissions and limits. | Minn. R. 7007.0800, subp. 2 |
| Each hour, the Permittee shall calculate and record the 1-hour SO ₂ emission limit using the regression equation, and record the 1-hour SO ₂ emission rate determined by the CEM. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Recordkeeping Requirements: The Permittee shall retain the following records for 5 years: 1) Calculations of the percent load on an hourly basis; 2) Calculations of the allowable hourly SO ₂ emission rate and the actual emission rate; 3) Calculations of the allowable 3-hour SO ₂ emission rate and the actual emission rate; and 4) Calculations of the allowable 24-hour (calendar day) SO ₂ emission rate and the actual emission rate. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| RECORDKEEPING - WITH OR WITHOUT USE OF CEMS | hdr |
| Daily Recordkeeping: The Permittee shall calculate and record the 24-hour average lbs/hour SO ₂ emission limit from the regression equation. The Permittee shall sum the 24 1-hour actual emission calculations for the previous calendar day and divide by 24. These calculations shall be completed and recorded daily for the previous day. These records shall be readily accessible at all times. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Daily Recordkeeping: The Permittee shall calculate and record the 3-hour average lbs/hour SO ₂ emission limits from the regression equation for the previous day. The Permittee shall sum the groups of three consecutive 1-hour actual emission calculations for the previous calendar day and divide by 3. These calculations shall be completed and recorded daily for the previous day. These records shall be readily accessible at all times. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Each 24-hour block period, the Permittee shall calculate and record the 24-hour SO ₂ emission limit using the regression equation, and record the 24-hour block average emission rate determined by the CEM. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Recordkeeping: The Permittee must obtain and maintain an analysis of the fuel oil burned in Emission Units 024, 025, 026, and 027 (Boilers 1, 2, 3, and 4) as follows: The Permittee shall obtain and retain fuel supplier certifications from the fuel supplier for each shipment of No. 6 and No. 2 fuel oil delivered to the facility, stating the guaranteed maximum sulfur content of the fuel delivered. By the end of the next business day after a fuel oil delivery, the Permittee shall calculate the sulfur content of the fuel in the tank using the sulfur content of the fuel in the tank prior to the delivery and calculating the new sulfur content of the tank after delivery. The Permittee shall collect a sample of No. 6 fuel oil from each No. 6 fuel oil storage tank once each year. The sample shall be analyzed for heating value and sulfur content. The sulfur content of the sample and the last calculated value of the sulfur content of the fuel oil in the tank shall be reported to the Agency. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Monitoring: The Permittee shall ensure that approved American Society of Testing and Materials (ASTM) methods are used to determine sulfur content and heating value of fuel oil samples. | Title I Condition: State Implementation Plan (SIP) for SO ₂ NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| CEMS OPERATING REQUIREMENTS | hdr |
| If the Permittee decides to install CEMs for SO ₂ and stack gas flowrate, the Permittee shall notify the Agency at least 30 days before starting installation of the CEMs. | Minn. R. 7007.0800, subp. 2 |
| CEMS Certification Test: due within 90 days after the due date of the first excess emission report. | Minn. R. 7017.1050, subp. 1 |
| CEM Certification Test Pretest Meeting: due 7 days before CEM Certification Test | Minn. R. 7017.1060, subp. 3 |
| The CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, and malfunction. This requirement to operate the monitor applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass the CEMS would endanger human health, safety, or plant equipment. | Minn. R. 7017.1090, subp. 1 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

| | |
|--|-----------------------------|
| Monitor downtime is a violation of subpart 1, except for reasonable periods of monitor downtime due to the following causes: A. damage to the monitoring system due to acts of God such as lightning strikes, tornadoes, or floods which render the monitor inoperative; B. sudden and not reasonably preventable monitor breakdowns C. scheduled monitor maintenance based on equipment manufacturer's recommended maintenance schedule which cannot reasonably be conducted when the emission unit is not operating; or D. unavoidable monitor downtime in order to conduct daily drift checks, calibration error audits, relative accuracy test audits, linearity checks, and cylinder gas audits which are required by a compliance document, applicable requirement, or by request of the Commissioner. | Minn. R. 7017.1090, subp. 2 |
| The Permittee shall submit an excess emission report each calendar quarter. The report must be submitted even if there were no excess emissions, monitor downtime, or monitor bypasses during the quarter. The report shall be submitted on a form approved by the Commissioner within 30 days of the end of each calendar quarter. | Minn. R. 7017.1110, subp. 1 |
| The excess emission report shall contain the information required by items A to C of this rule. | Minn. R. 7017.1110, subp. 2 |
| The Permittee shall maintain a file of all of the following CEMS information at the emission facility in a form suitable for inspection for at least five years from the date of each record: each one-hour emission average recorded by the CEMS; monitor certification test reports; excess emissions reports; cylinder gas audit reports; relative accuracy test audits; results of daily calibration drift checks; log of adjustments made to the CEMS and maintenance performed on the CEMS; and all other monitoring system information required by an applicable compliance document. The owner or operator shall also keep an updated copy of the facility's CEMS quality assurance plan on site. | Minn. R. 7017.1130 |
| Maintain a written CEMS QA/QC program available in a form suitable for inspection. | Minn. R. 7017.1170, subp. 2 |
| The facility owner or operator shall conduct daily calibration drift assessments and make adjustments as needed according to the procedure listed in items A and B and Code of Federal Regulations, title 40, section 60.13(d)(1), for each pollutant concentration and diluent monitor. The calibration drift assessment shall be conducted on each monitor range. The span value specified in the applicable requirement or compliance document shall be used to determine the zero and span calibration points. If no span value is specified in the applicable requirement or compliance document, the owner or operator shall use a span value equivalent to 1.5 times the emission limit. | Minn. R. 7017.1170, subp. 3 |
| A. For an extractive CEMS, minimum drift assessment procedures shall include introducing applicable zero and span gas mixtures into the measurement system as near the probe as is practical. Gases within +/- two percent of tag value shall be used to perform the span (upscale) drift assessment. The span and zero gas mixtures shall be the same composition as specified in the applicable performance specification. B. For a nonextractive, in situ CEMS, minimum drift assessment procedures shall include upscale checks using a certified calibration gas cell or test cell which is functionally equivalent to a known gas concentration. The zero check may be performed by computing the zero value from upscale measurements or by mechanically producing a zero condition. | Minn. R. 7017.1170, subp. 3 |
| Permittee must automatically check the zero (or low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span must, as a minimum, be adjusted whenever either the 24-hour zero drift or the 24-hour span drift exceeds two times the limit of the applicable performance specification in Appendix B of this part. The system must allow the amount of the excess zero and span drift to be recorded and quantified whenever specified. | Minn. R. 7017.1170, subp. 3 |
| CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year following CEMS Cylinder Gas Audit (CGA) (initial CGA), except that a CGA is not required during any calendar half year in which a RATA was performed on the CEMS. The initial CGA is due within 180 days following the certification test. Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F. | Minn. R. 7017.1170, subp. 4 |
| CEMS Relative Accuracy Test Audit (RATA): due 365 days after CEM Certification Test. Additional RATA required before the end of each subsequent calendar year unless the relative accuracy is 15% or less, in which case the next RATA is not due for 24 months. Follow the procedures in 40 CFR pt. 60, Appendix F. | Minn. R. 7017.1170, subp. 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 002 Boilers 1, 3 & 4 Franklin**Associated Items:** CE 001 Centrifugal Collector - High Efficiency

EU 024 Boiler 1 - Franklin

EU 026 Boiler 3 - Franklin

EU 027 Boiler 4 - Franklin

SV 004 Boilers Stack - Franklin

| What to do | Why to do it |
|---|-----------------------------|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input for each individual emission unit in GP002. The physical PTE of EU024 is 0.14 lbs/million Btu heat input. The controlled PTE of EU026 and EU027 is 0.028 lbs/million Btu heat input. | Minn. R. 7011.0510, subp. 1 |
| Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input for each individual emission unit in GP002 when combusting fuel oil alone. | Minn. R. 7011.0510, subp. 1 |
| Opacity: less than or equal to 20 percent opacity , except for one six-minute period per hour of not more than 60 percent opacity for each individual emission unit in GP002. | Minn. R. 7011.0510, subp. 2 |
| CONTROL REQUIREMENTS (see subject item CE001 for further requirements) | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 003 Generators 1, 2, 3 & 4 Prospect

Associated Items: EU 058 Generator 1 - Prospect Plant
EU 059 Generator 2 - Prospect Plant
EU 060 Generator 3 - Prospect Plant
EU 061 Generator 4 - Prospect Plant
SV 009 Generator No 1 Stack - Prospect
SV 010 Generator No 2 Stack - Prospect
SV 011 Generator No 3 Stack - Prospect
SV 012 Generator No 4 Stack - Prospect

| What to do | Why to do it |
|---|---|
| EMISSION & OPERATING LIMITS | hdr |
| Nitrogen Oxides: less than or equal to 3.84 lbs/million Btu heat input | Title I Condition: Limit to avoid classification of modification as major under 40 CFR Section 52.21 |
| Sulfur Dioxide: less than or equal to 0.2 lbs/million Btu heat input | Title I Condition: Minn. R. 7007.0020 & 40 CFR Section 52.21(k) [to not cause or contribute to a violation of the State & Federal ambient air quality standards & the ambient air increments established in 40 CFR Section 52.21(c)] |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input | Minn. R. 7011.2300, subp. 2 |
| Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. | Minn. R. 7011.2300, subp. 1 |
| Limit on Hours of Operation: The sum of the four units' Operating Hours: less than or equal to 400 hours/year using 12-month Rolling Sum | Title I Condition: To avoid classification as a major mod under 40 CFR 52.21; Minn. R. 7007.0020 & 40 CFR 52.21(k) [to not cause or contribute to a violation of ambient air quality standards & ambient air increments of 40 CFR 52.21(c)] |
| Permitted Fuel: Diesel only | Title I Condition: Limit to avoid classification of modification as major under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 |
| Sulfur Content of Fuel: less than or equal to 0.2 percent by weight | Title I Condition: To avoid classification as a major mod under 40 CFR 52.21; Minn. R. 7007.0020 & 40 CFR 52.21(k) [to not cause or contribute to a violation of ambient air quality standards & ambient air increments of 40 CFR 52.21(c)] |
| RECORDKEEPING REQUIREMENTS | hdr |
| The Permittee shall obtain and retain fuel supplier certifications from the fuel supplier for each shipment of diesel fuel delivered to the facility certifying the sulfur content of the fuel is less than 0.2% by weight. | Title I Condition: Limit to avoid classification of modification as major under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5 |
| Recordkeeping Requirements: The Permittee shall retain the fuel supplier certifications and/or fuel sampling and analysis records for 5 years. | Title I Condition: Limit to avoid classification of modification as major under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5 |
| Recordkeeping: By the last day of the month, record the total hours of operation for the sum of the four generators and calculate and record the 12-month rolling sum. | Title I Condition: Limit to avoid classification of modification as major under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 004 Paint, Wood Sanding, & Metal Sanding Booth - Franklin Paint Booth - Methodist Hospital

Associated Items: CE 006 Fiberglass Filter w/Cardboard Frame

CE 007 Fiberglass Filter w/Cardboard Frame

EU 004 Paint Booth (5th floor) - Franklin

EU 006 Wood Sanding in Paint Booth (5th floor) - Franklin

EU 007 Metal Sanding in Paint Booth (5th floor) - Franklin

EU 009 Paint Booth - Methodist Hospital

SV 001 Paint, Wood Sanding & Metal Sanding Booth - Franklin

SV 002 Paint Booth - Methodist Hospital

| What to do | Why to do it |
|---|---|
| EMISSION LIMITS | hdr |
| Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. (Applies individually to each unit listed under GP004) | Minn. R. 7011.0715, subp. 1(A) |
| Opacity: less than or equal to 20 percent opacity . This limit applies individually to each unit comprising GP004. | Minn. R. 7011.0715, subp. 1(B) |
| HAPs - Total: less than or equal to 5 tons/year using 12-month Rolling Sum basis calculated monthly, for the group. MSDS sheets or similar manufacturers' formulation data will be used to determine whether or not a given paint contains HAPs. Maintaining HAP-containing paint usage below 5 tpy will ensure that HAP emissions are less than 5 tpy from paint usage. If the HAP-containing paint usage exceeds 4.9 tons on a 12-month rolling sum basis, the facility can perform detailed emission calculations based on the actual HAP content of the paints to demonstrate that actual HAP emissions do not exceed 5 tpy. If this option is chosen, the calculations shall be based on MSDS sheets or other formulation data obtained from the paint manufacturers and actual paint usage data. | Title I Condition: Avoid major source status as defined under 40 CFR Section 63.2 |
| RECORDKEEPING REQUIREMENTS | hdr |
| Paint Usage Monitoring and Recordkeeping: The Permittee shall keep monthly records of all paint used. These records shall include, but are not limited to, the VOC and HAP weight fraction and the total weight of each coating used. The VOC and HAP content of the coating shall be determined as specified under the Material Content condition listed below. | Title I Condition: Monitoring and Recordkeeping for limits taken to avoid major source status as defined under 40 CFR Section 63.2 |
| Paint Usage Calculation: By the 15th day of each month the Permittee shall do the following: 1. Calculate, record, and maintain a monthly log of paint usage during the preceding month. 2. Calculate the combined 12-month rolling sum of paint usage for the previous 12 months using the monthly paint usage log. This number must be less than or equal to the specified paint usage limit of 5 tons per year. If paint usage exceeds 4.9 tons on a 12-month rolling sum basis, the facility shall perform detailed emission calculations based on the actual HAP content of the paints to demonstrate that actual HAP emissions do not exceed 5 tpy. The calculations shall be based on MSDS sheets or other formulation data obtained from the paint manufacturers and actual paint usage data. 3. All records shall be recorded and maintained at the facility. | Title I Condition: Monitoring and Recordkeeping for limits taken to avoid major source status as defined under 40 CFR Section 63.2 Minn. R. 7007.0800, subp. 5 |
| Determination of Material Content for Emission Calculations to be submitted on the Emission Inventory Report: VOC and HAP contents of all materials shall be determined by using the Material Data Safety Sheets (MSDS) provided by the coating supplier or the laboratory or site formulation database, for each material used. If a range is provided for the VOC or single HAP content of a material, the Permittee shall use the maximum value of the range. The Permittee shall assume a 100 percent VOC content (by weight) if exact VOC contents is not available or are too difficult to obtain. The Division Manager reserves the right to require the Permittee to take samples of VOC and HAP containing materials and to conduct analysis to determine the VOC and HAP content per U.S. Environmental Protection Agency (EPA) reference methods. If the EPA reference method is used, the data from the reference method analysis shall supersede the MSDS. | Title I Condition: Monitoring and Recordkeeping for limits taken to avoid major source status as defined under 40 CFR Section 63.2 Minn. R. 7007.0800, subp. 5 |
| CONTROL REQUIREMENTS | hdr |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

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|--|--|
| The operation of this control device is not necessary in order for the process and source to meet applicable emission limits. However, if the Permittee wishes to take credit for operation of this device for purposes of reporting actual emissions for the emissions inventory, then the Permittee must comply with the following requirements. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| In order to receive credit for the control efficiency of the filters, the hood/booth capture system must conform to the requirements listed in Minn. R. 7011.0070, subp. 1, and the Permittee must certify this for each hood/booth as specified in Minn. R. 7011.0070, subp. 3. Once the hoods are certified, the Permittee shall maintain a copy of each certification on site, as well as an annual record of fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method. Prior to this certification, the control efficiency (capture efficiency x panel efficiency) is considered to be 0%. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Daily Inspections: Once each operating day, the Permittee shall visually inspect the condition of each panel filter with respect to alignment, saturations, tears, holes and any other condition that may affect the filter's performance. The Permittee shall maintain a daily written record of filter inspections. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| The Permittee shall operate and maintain the panel filters any time that any process equipment controlled by the panel filters are in operation. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 005 Emergency Generators A, B & C - Methodist Hospital**Associated Items:** EU 011 Emergency Generator A - Methodist Hospital

EU 012 Emergency Generator B - Methodist Hospital

EU 013 Emergency Generator C - Methodist Hospital

SV 003 Generators Stack - Methodist Hospital

| What to do | Why to do it |
|--|---------------------------------|
| EMISSION LIMITS & OPERATING LIMITS | hdr |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input | Minn. R. 7011.2300, subp. 2 |
| Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained. | Minn. R. 7011.2300, subp. 1 |
| Sulfur Content of Fuel: less than or equal to 0.5 percent by weight | Minn. R. 7007.0800, subp. 2 |
| RECORDKEEPING REQUIREMENTS | hdr |
| Hours of Operation: The Permittee shall maintain documentation on site that each unit is an emergency diesel generator by design that qualifies under the U.S. EPA memorandum entitled "Calculating Potential to Emit (PTE) for Emergency Generators" dated September 6, 1995, limiting operation to 500 hours per year. | Minn. R. 7007.0800, subp. 4 & 5 |
| The Permittee shall obtain and retain fuel supplier certifications from the fuel supplier for each shipment of diesel fuel delivered to the facility certifying the sulfur content of the fuel is less than 0.5% by weight. | Minn. R. 7007.0800, subp. 5 |
| Recordkeeping Requirements: The Permittee shall retain the fuel supplier certifications and/or fuel sampling and analysis records for 5 years. | Minn. R. 7007.0800, subp. 5 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 006 Generators 4 & 5 - Franklin

Associated Items: EU 028 Generator 4 - Franklin

EU 029 Generator 5 - Franklin

SV 005 No 4 Generator Stack - Franklin

SV 006 No 5 Generator Stack - Franklin

| What to do | Why to do it |
|--|---|
| EMISSION & OPERATING LIMITS | hdr |
| Opacity: less than or equal to 20 percent opacity , once operating temperatures have been attained. | Minn. R. 7011.2300, subp. 1 |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input | Minn. R. 7011.2300, subp. 2 |
| Sulfur Content of Fuel: less than or equal to 0.5 percent by weight | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Operating Hours: less than or equal to 1050 hours/year using 12-month Rolling Sum for the two units, combined. | Minn. R. 7007.0800, subp. 4 & 5 (limit assumed in calculating potential emissions) |
| The Permittee must have an analysis of the fuel oil burned in Emission Units 028 and 029 (diesel generators) using either Method 1 or 2 following: Method 1: The Permittee shall obtain and retain fuel supplier certifications from the fuel supplier for each shipment of No. 2 fuel oil delivered to the facility certifying the sulfur content of the fuel is less than 0.5% by weight. OR Method 2: The Permittee shall collect a sample of fuel oil after each fuel delivery, but no more than once per calendar day, from the fuel oil storage tank, fuel oil supply line, or other approved sampling locations on those days when fuel oil is burned in any of the boilers. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| RECORDKEEPING REQUIREMENTS | hdr |
| Monitoring: The Permittee shall ensure that approved American Society of Testing and Materials (ASTM) methods are used to determine sulfur content and heating value of fuel oil samples. | Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50 and Minnesota SIP |
| Recordkeeping Requirements: The Permittee shall retain the fuel supplier certifications and/or fuel sampling and analysis records for 5 years. | Title I Condition: State Implementation Plan for Sulfur Dioxide; Minn. R. 7007.0800, subp. 5 |
| Recordkeeping: By the 15th day of each month, calculate and record the total hours operated by the two generators during the previous month, and the 12 month rolling sum. | Minn. R. 7007.0800, subp. 2 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: GP 007 GEA & Echodyne Cooling Towers - Franklin

Associated Items: EU 031 GEA Cooling Tower - Franklin

EU 033 Echodyne Cooling Tower - Franklin

SV 007 GEA Cooling Tower Vents (2) - Franklin

SV 008 Echodyne Cooling Tower Vent - Franklin

| What to do | Why to do it |
|---|--------------------------------|
| Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. This limit applies individually to each unit in GP007. For EU 031, the potential emissions at maximum capacity are 3.37 lb/hr, compared to a limit of 260.17 lb/hr (0.02 gr/dscf). For EU033, the potential emissions at maximum capacity are 6.32 lb/hr, compared to a limit of 498.43 lb/hr (0.02 gr/dscf). | Minn. R. 7011.0715, subp. 1(A) |
| Opacity: less than or equal to 20 percent opacity . This limit applies individually to each unit GP007. | Minn. R. 7011.0715, subp. 1(B) |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: EU 025 Boiler 2 - Franklin

Associated Items: GP 001 Boilers 1, 2, 3 & 4 Franklin

SV 004 Boilers Stack - Franklin

| What to do | Why to do it |
|--|---|
| EMISSION LIMITS FOR UNMODIFIED BOILER BURNING NATURAL GAS ONLY | hdr |
| Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input | Minn. R. 7011.0510, subp. 1 |
| Opacity: less than or equal to 20 percent opacity , except that a maximum of 60% opacity shall be permissible for 4 minutes in any 60-minute period, and that a maximum of 40% opacity shall be permissible for four additional minutes in any 60-minute period. | Minn. R. 7011.0510, subp. 2 |
| PREAUTHORIZED MODIFICATION | hdr |
| The Permittee is authorized to modify the boiler such that it is capable of combusting no. 2 fuel oil in addition to natural gas. At the time that this modification takes place, the Permittee shall comply with the remaining applicable portions of this section, depending on whether the modified boiler is subject to NSPS Subpart Dc or Subpart Db. | Minn. R. 7007.0150, subp. 1 |
| Prior to commencing construction to add No. 2 fuel oil capability to this emission unit, the Permittee shall perform an evaluation of the associated increase in NOx emissions to determine whether or not such project would constitute a major modification under New Source Review (NSR) regulations. The evaluation shall be conducted using the current NSR calculation methodology and shall be submitted as part of the "Notification of the Date Construction Began" submittal. If the evaluation shows that the project would constitute a major modification under NSR, the necessary permit will be obtained prior to commencing construction on the project. | Title Condition: To avoid classification as a major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000 |
| Sulfur Dioxide: less than or equal to 39 tons/year using 12-month Rolling Sum | Title I Condition: limit to avoid classification as a major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000 |
| Recordkeeping: By the 15th day of each month, calculate and record the SO2 emissions from combustion of No. 2 fuel oil in EU025 during the previous month, using the calculation below, and the 12-month rolling sum for the previous 12 months. $SO_2(m) = 2 \times A \times B \times C / 2000$ where: $SO_2(m)$ = monthly SO2 emissions 2 = lb SO2 per lb S A = lb sulfur per lb No. 2 fuel oil (obtained from fuel oil supplier or testing) B = gallons of No. 2 fuel oil burned during the month C = density of No. 2 fuel oil (lb/gal) | Title I Condition: limit to avoid classification as a major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000 |
| Initial Performance Test: due 180 days after Initial Startup with No. 2 fuel oil, but not to exceed 60 days after achieving the maximum production rate at which the affected facility will be operated, to measure opacity as limited by NSPS Subpart Dc or Db. | 40 CFR Section 60.8(a) |
| ALTERNATIVE LIMITS AND REQUIREMENTS FOR MODIFIED BOILER SUBJECT TO NSPS SUBPART Dc | hdr |
| Capacity: less than or equal to 95 million Btu's/hour for Heat Input Limit. Prior to commencing construction on modifications to this boiler to use No. 2 fuel oil, the Permittee shall submit to the MPCA a description of the physical limitation which will be constructed to permanently prevent the actual heat input to this boiler from exceeding 95 million Btu's/hour when combusting fuel oil or a combination of fuel oil and natural gas. | Minn. R. 7007.0800, subp. 2, to avoid requirements of 40 CFR pt. 60, subp. Db |
| Monitoring and Recordkeeping: The Permittee shall determine and record each hour, the amount of natural gas and No. 2 fuel oil combusted. The Permittee shall determine and record the hourly heat input rate based on fuel usage using the following equation: $\text{Heat Input} = (1050 \text{ Btu/SCF} \times \text{SCF natural gas/hr}) + (140,000 \text{ Btu/gallon} \times \text{gallons no. 2 oil/hr})$ where SCF = natural gas standard cubic feet | Minn. R. 7007.0800, subp. 4 and subp. 5 (most stringent, meets requirements set by 40 CFR Section 60.48c(g) and Minn. R. 7011.0570) |
| Sulfur Content of Fuel: less than or equal to 0.5 percent by weight | 40 CFR Section 60.42c(d); Minn. R. 7011.0570 |
| Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one 6-minute period per hour of not more than 27 percent opacity. This limit does not apply during periods of startup, shutdown, or malfunction, or while burning natural gas. | 40 CFR Section 60.43c(c); Minn. R. 7011.0570 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

| | |
|--|---|
| Recordkeeping: The Permittee shall obtain and maintain a fuel supplier receipt for each shipment of fuel oil delivered certifying what American Society of Testing and Materials (ASTM) specification applies to the shipment and that the sulfur content does not exceed 0.5% by weight. | 40 CFR Section 60.42c(h)(1); Minn. R. 7011.0570 |
| Initial Performance Test for Sulfur Dioxide: fuel supplier receipts for sulfur content of fuel as specified above to document the sulfur content of fuel as required by 40 CFR Section 60.42c(d). | 40 CFR Section 60.44c(h); Minn. R. 7011.0570 |
| ALTERNATIVE LIMITS AND REQUIREMENTS FOR MODIFIED BOILER SUBJECT TO NSPS SUBPART Db | hdr |
| Nitrogen Oxides: less than or equal to 0.1 lbs/million Btu heat input using 30-day Rolling Average . The nitrogen oxides standards apply at all times including periods of startup, shutdown and malfunction. | 40 CFR Section 60.44b(a); 40 CFR Section 60.44b(h); Minn. R. 7011.0565 |
| Fuel Oil - Sulfur Content of Fuel: less than or equal to 0.5 percent by weight using 30-day Rolling Average | 40 CFR Section 60.42b(j); 40 CFR Section 60.42b(e); Minn. R. 7011.0565 |
| Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input using 30-day Rolling Average | 40 CFR Section 60.41(b) (definition of very low sulfur fuel); meets limit set by 40 CFR Section 60.42b(a); 40 CFR Section 60.42b(e); Minn. R. 7011.0565 |
| Opacity: less than or equal to 20 percent opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. The opacity standard applies all times, except during periods of startup, shutdown or malfunction, or while burning natural gas. | 40 CFR Section 60.43b(f); 40 CFR Section 60.43b(g); Minn. R. 7011.0565 |
| Recordkeeping: The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. | 40 CFR Section 60.7(b) |
| Recordkeeping: The Permittee shall maintain records of the type and amount of each fuel combusted each day; calculate the annual capacity factor for each fuel for each calendar quarter. Annual capacity factor is calculated on a 12-month Rolling Average basis at the end of each calendar month. | 40 CFR Section 60.49b(d); Minn. R. 7011.0565 |
| COMS Installation: Install, calibrate, maintain, and operate a continuous monitoring system for measuring the opacity and recording the opacity emissions from Boiler No. 2 (EU025). | 40 CFR Section 60.48b(a); Minn. R. 7011.0565 |
| Sulfur Dioxide: The Permittee shall obtain and maintain at the facility fuel receipts from the fuel supplier which certify that fuel oil meets the definition of very low sulfur oil, as defined at 40 CFR Section 60.41b. | 40 CFR Sections 60.42b(j) and 60.49b(r); Minn. R. 7011.0565 |
| CEMS Installation: Install, maintain, calibrate, and operate a continuous monitoring system for measuring nitrogen oxides emissions and record the output of the system in the units of the standard (lb/million Btu). | 40 CFR Section 60.48b(b); Minn. R. 7011.0565 |
| Initial Performance Test: Conduct the performance test for nitrogen oxides by using the CEMS to determine the 30-day average emission rate, as described in the rule. | 40 CFR Section 60.46b(e)(1); Minn. R. 7011.0565 |
| Compliance Methods: Upon request, compliance with the NOX standards under 40 CFR Section 60.44b shall be determined through the use of a 30-day performance test. During periods when performance tests are not requested, NOX emissions data collected pursuant to 40 CFR Section 60.44b(g)(1) or (2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports by will not be used to determine compliance with the NOX emission standards. A new 30-day rolling average emission rate is calculated each steam generating operating day as the average of all of the hourly NOX emission data for the preceeding 30 steam generating unit operating days. | 40 CFR Section 60.46b(e)(4); Minn. R. 7011.0565 |
| CONTINUOUS EMISSION MONITORING SYSTEM (CEMS) REQUIRED BY SUBPART Db | hdr |
| CEM Certification Test: due 180 days after Initial Startup, but not later than 60 days after achieving maximum capacity. | 40 CFR Section 60.13(b) |
| CEM Certification Test: due 90 days after Excess Emissions/Downtime Reports (EER's) due date (first report) for COMS. | Minn. R. 7017.1050, subp. 1 |
| CEM Certification Test Pretest Meeting: due 7 days before CEM Certification Test | Minn. R. 7017.1060, subp. 3 |
| QA Plan: Develop and implement a written quality assurance plan that covers each EMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain all of the information required by 40 CFR 60, Appendix F, section 3. | 40 CFR Section 60.13(a); 40 CFR Section 60.48b(e) and Minn. R. 7011.0565; Minn. R. 7017.1170, subp. 2 |
| CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year following CEM Certification Test. If the relative accuracy is 15 percent or less, the next CEMS RATA is not due for 24 months. Follow the procedures in 40 CFR pt. 60, Appendix F. | Minn. R. 7017.1170, subp. 5 |
| CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. Appendix F shall be used to determine out-of-control periods for CEMS. | 40 CFR Section 60.13(d)(1); Minn. R. 7017.1170, subp. 3 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

| | |
|---|--|
| CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year following CEM Certification Test except during semiannual periods in which a RATA is conducted. Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR 60, Appendix F. | Minn. R. 7017.1170, subp. 4 |
| Recordkeeping: The Permittee must retain records of all monitoring data and support information measurements including all performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on the monitoring systems or devices in a form suitable for inspection for a period of five years from the date of all monitoring sample, measurement, or report. Records shall be kept at the source. | Minn. R. 7017.1130; 40 CFR Section 60.7(f) |
| CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation. | 40 CFR Section 60.13(e); Minn. R. 7017.1090 |
| COMS Certification Test: due 180 days after Initial Startup, but no later than 60 days after achieving maximum capacity. | 40 CFR Section 60.13(b) |
| The owner or operator must conduct and complete certification testing within 90 days after the due date of the first excess emissions report required for the COMS. | Minn. R. 7017.1050, subp. 1 |
| COMS Certification Test Pretest Meeting: due 7 days before COMS Certification Test | Minn. R. 7017.1060, subp. 3 |
| COMS QA/QC Plan: The Permittee shall develop and implement a written quality assurance plan which covers each COMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall be revised as needed in order to keep it up to date with the facility's current policies and procedures. The plan shall contain written procedures which should describe in detail complete, step-by-step procedures and operations for each of the following activities: A. calibration of a COMS; B. drift determination and adjustment of a COMS; | Minn. R. 7017.1210, subp. 1 |
| C. preventative maintenance of the COMS, including the manufacturer's spare parts list for each COMS, and require that these parts be kept at the facility unless the commissioner gives written approval to exclude specific spare parts from the list. The commissioner may approve requested exclusions if the commissioner determines that it is not reasonable to keep a specific part on site after consideration of the consequences of a malfunction of the part, the likelihood of a malfunction, the time required to obtain the part, and other pertinent factors; D. data recording, calculations, and reporting; E. accuracy audit procedures; and F. program for corrective actions for a malfunctioning COMS. | continued from above |
| Attenuator Calibration: The owner or operator shall have an independent testing company conduct calibrations of each of the neutral density filters used in the calibration error audit according to the procedure in Code of Federal Regulations, title 40, part 60, appendix B, section 7.1.3., within the time frame of opacity stability guaranteed by the attenuator manufacturer. The manufacturer's guarantee of stability shall be on site available for inspection. | Minn. R. 7017.1210, subp. 4 |
| COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all COMS shall be in continuous operation. | 40 CFR Section 60.13(e) |
| COMS Daily Calibration Drift (CD) Check: The Permittee must automatically, intrinsic to the opacity monitor, check the zero and upscale (span) calibration drifts at least once daily. The span value shall be between 60 and 80 percent. For COMS without automatic zero adjustments, the optical surfaces exposed to effluent gases must be cleaned before performing the drift adjustments. For COMS with automatic zero adjustments, the optical surfaces must be cleaned when the cumulative automatic zero compensation exceeds 4 percent opacity. Minimum procedures must include an automated method for producing a simulated zero opacity condition and an upscale opacity condition as specified in 40 CFR Section 60.13(d)(2). | 40 CFR Sections 60.13(d)(1), 60.13(d)(2), and 60.48b(e)(1); Minn. R. 7017.1210, subp. 2; Minn. R. 7007.0800, subp. 4 |
| COMS Calibration Error Audit: due before end of each calendar half-year following COMS Certification Test. Conduct audits at least 3 months apart and no greater than 8 months apart. | Minn. R. 7017.1210, subp. 3 |
| COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to six-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the applicable averaging period. | Minn. R. 7017.1200 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN
Permit Number: 10900084 - 001

| | |
|--|--|
| Recordkeeping: The Permittee shall retain records of all monitoring data and support information measurements including all performance evaluations, all continuous monitoring system or monitoring device calibration checks, adjustments and maintenance performed on the monitoring systems or devices in a form suitable for inspection for a period of 5 years from the date of the monitoring sample, measurement, or report. Records shall be kept at the source. | Minn. R. 7017.1130; 40 CFR Section 60.7(f) |
|--|--|

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: EU 062 Prospect Distillate Fired Boiler**Associated Items:** SV 013 Boiler Stack - Prospect

| What to do | Why to do it |
|---|--|
| EMISSION & OPERATING LIMITS | hdr |
| Opacity: less than or equal to 20 percent opacity using 6-minute Average , except for one 6-minute period per hour of not more than 27 percent opacity. This limit does not apply during periods of startup, shutdown, or malfunction. | 40 CFR Section 60.43c(c); 40 CFR Section 60.43c(d); Minn. R. 7011.0570 |
| Fuel Restriction: Limited to distillate fuel only. | Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21 |
| Distillate Oil - Fuel Usage: less than or equal to 3500000 gallons/year using 12-month Rolling Sum | Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21 |
| Sulfur Content of Fuel: less than or equal to 0.05 percent by weight | Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21; meets the requirement of 40 CFR Section 60.42c(d) |
| The SO2 emission limits, fuel oil sulfur limits, and percent reduction requirements under this section apply at all times, including periods of startup, shutdown, and malfunction. | 40 CFR Section 60.42c(i); Minn. R. 7011.0570 |
| RECORDKEEPING REQUIREMENTS | hdr |
| The Permittee shall record and maintain records of the amount of distillate fuel oil combusted on a monthly basis. These records may consist of purchase records or receipts. Records must be maintained for at least two years. | 40 CFR Section 60.13(i) and February 20, 1992 EPA memorandum to meet the requirements of 40 CFR Section 60.48c(g) and (i) |
| Recordkeeping: By the 15th day of each month, calculate and record the following: a. the total quantity of fuel oil combusted in the boiler during the previous month, and b. the total quantity of fuel oil combusted in the boiler during the previous 12 months (12-month rolling sum). | Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21 |
| Compliance with the emission limits or fuel oil sulfur limits may be determined based on a certification from the fuel supplier as described under 40 CFR Section 60.48c(f)(1). | 40 CFR Section 60.42c(h); Minn. R. 7011.0570 |
| The Permittee will obtain a fuel oil supplier certification for each shipment of fuel oil that states that the oil meets the definition of distillate oil in 40 CFR Section 60.41c. Each certification must show the sulfur content of the shipment of fuel oil. | Title I Condition: To avoid classification as a major modification under 40 CFR Section 52.21; 40 CFR Section 60.48c(e)(11) |
| The Permittee will remove the distillate-fired boiler (EU062) from the facility upon commencement of steam being supplied to the Prospect Utility Plant and distributed to the Mayo campus. | Title I Condition: Minn. R. 7007.0020 and 40 CFR Section 52.21(k) [to not cause or contribute to a violation of the State and Federal ambient air quality standards and the ambient air increments established in 40 CFR Section 52.21(c)] |
| The owner or operator of each affected facility subject to the SO2 emission limits, fuel oil sulfur limits, or percent reduction requirements under 40 CFR Section 60.42c shall submit reports to the Administrator. | 40 CFR Section 60.48c(d); Minn. R. 7011.0570 |
| The Permittee shall keep records and submit reports as required under 40 CFR Section 60.48c(d), including the following information: (1) Calendar dates covered in the reporting period (2) - (10) Not applicable (11) Records of fuel supplier certification as described under 40 CFR Section 60.48c(f)(1). The report shall also include a certified statement signed by the owner or operator of the affected facility that the records of the fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. | 40 CFR Section 60.48c(e); Minn. R. 7011.0570 |
| The reporting period for the reports required under this subpart is each six-month period. All reports shall be submitted to the Administrator and shall be postmarked by the 30th day following the end of the reporting period. | 40 CFR Section 60.48c(j); Minn. R. 7011.0570 |

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

Subject Item: CE 001 Centrifugal Collector - High Efficiency**Associated Items:** EU 026 Boiler 3 - Franklin

EU 027 Boiler 4 - Franklin

GP 002 Boilers 1, 3 & 4 Franklin

| What to do | Why to do it |
|--|--|
| The operation of this control device is not necessary in order for the process and source to meet applicable emission limits. However, if the Permittee wishes to take credit for operation of this device for purposes of reporting actual emissions for the emissions inventory, then the Permittee must comply with the following requirements. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| The Permittee shall operate and maintain the cyclone at all times that any process equipment controlled by the cyclone (listed above under Associated Items) is operating. The Permittee shall operate and maintain the cyclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| The Permittee shall operate and maintain the control device such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 80 percent control efficiency | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| The Permittee shall operate and maintain the control device such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 80 percent control efficiency | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored cyclone is in operation. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Recordkeeping of Pressure Drop: The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Pressure Drop: greater than or equal to 0 inches of water column and less than or equal to 5 inches of water column, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated. The Permittee shall record the pressure drop once every 24 hours when in operation. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |
| Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the cyclone or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the cyclone. The Permittee shall keep a record of the type and date of any corrective action taken for the cyclone. | Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020(F) |

TABLE B: SUBMITTALS

11/24/04

Facility Name: Mayo Clinic - Rochester MN
Permit Number: 10900084 - 001

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

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

Send any application for a permit or permit amendment to:

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

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

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

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

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

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

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

| What to send | When to send | Portion of Facility Affected |
|---|--|------------------------------|
| Application for Permit Reissuance | due 180 days before expiration of Existing Permit | Total Facility |
| CEM Certification Test Notification | due 30 days before CEM Certification Test | EU025 |
| CEM Certification Test Plan | due 30 days before CEM Certification Test | EU025, GP001 |
| CEM Certification Test Report - Microfiche Copy | due 105 days after CEM Certification Test | EU025, GP001 |
| CEM Certification Test Report | due 45 days after CEM Certification Test | EU025, GP001 |
| Computer Dispersion Modeling Information | due 1,096 days after Permit Issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for PM10, NOX, and SO2). This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act. | Total Facility |
| COMS Certification Test Notification | due 30 days before COMS Certification Test | EU025 |
| COMS Certification Test Plan | due 30 days before COMS Certification Test | EU025 |
| COMS Certification Test Report - Microfiche Copy | due 105 days after COMS Certification Test | EU025 |
| COMS Certification Test Report | due 45 days after COMS Certification Test | EU025 |
| Notification of the Actual Date of Initial Startup | due 15 days after Initial Startup on No. 2 fuel oil. | EU025 |
| Notification of the Date Construction Began | due 30 days after Start Of Construction to add No. 2 fuel oil capability to this emission unit. | EU025 |
| Notification of the date of Equipment Removal/Dismantlement | due 15 days after Equipment Removal and/or Dismantlement | EU062 |
| Relative Accuracy Test Audit (RATA) Notification | due 30 days before CEMS Relative Accuracy Test Audit (RATA) | EU025, GP001 |

TABLE B: RECURRENT SUBMITTALS

11/24/04

Facility Name: Mayo Clinic - Rochester MN

Permit Number: 10900084 - 001

| What to send | When to send | Portion of Facility Affected |
|---|---|------------------------------|
| COMS Calibration Error Audit Results Summary | due 30 days after end of each calendar quarter following COMS Calibration Error Audit | EU025 |
| Cylinder Gas Audit (CGA) Results Summary | due 30 days after end of each calendar quarter following Cylinder Gas Audit | EU025 |
| Cylinder Gas Audit (CGA) Results Summary | due 30 days after end of each calendar quarter following end of the calendar quarter in which the Audit was performed | GP001 |
| Excess Emissions/Downtime Reports (EER's) | due 30 days after end of each calendar quarter following Permit Issuance (Submit Deviations Reporting Form DRF-1 as amended). The EER must contain all of the information requested in 40 CFR Section 60.7(c). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunction. | EU025 |
| Excess Emissions/Downtime Reports (EER's) | due 30 days after end of each calendar quarter following Permit Issuance (Submit Deviations Reporting Form DRF-1 as amended). The EER must contain all of the information requested in 40 CFR Section 60.7(c). The EER shall indicated all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunction. | EU025 |
| Relative Accuracy Test Audit (RATA) Results Summary | due 30 days after end of each calendar quarter following CEMS Relative Accuracy Test Audit (RATA) | EU025 |
| Relative Accuracy Test Audit (RATA) Results Summary | due 30 days after end of each calendar quarter following CEMS Relative Accuracy Test Audit (RATA) | GP001 |
| Semiannual Deviations Report | due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations. | Total Facility |
| Compliance Certification | due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, to both the Commissioner and the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. | Total Facility |

APPENDIX B: GP 001 EQUATIONS

Facility Name: Mayo Medical Center - Rochester

Permit Number: 10900084-001

Calculation of Percent Load (X)

Equation 1

$$X (\% \text{ Load}) = 100 \times \frac{\left[\left(\frac{\text{No. 6 gallon}}{\text{hr}} \right) \times \left(\frac{150,000 \text{ Btu}}{\text{gal}} \right) \right] + \left[\left(\frac{\text{NGSCF}}{\text{hr}} \right) \times \left(\frac{1050 \text{ Btu}}{\text{SCF}} \right) \right] + \left[\left(\frac{\text{No. 2 gallon}}{\text{hr}} \right) \times \left(\frac{140,000 \text{ Btu}}{\text{gallon}} \right) \right]}{333,000,000 \text{ Btu/hr}}$$

Where:

No. 6 gal = gallons of No. 6 fuel oil burned in Boilers No. 1, 3 and 4

NGSCF = Natural gas standard cubic feet burned in Boilers No. 1, 2, 3, and 4

No. 2 gal = gallons of No. 2 fuel oil burned in Boilers No. 1, 2, 3, and 4

Regression Equations

Regression Equation 1

$$\text{Lbs/hour SO}_2 = 440.5678 - 33.713368 X + 1.258905 X^2 - 0.0221617 X^3 + [(1.89529 \times 10^{-4}) X^4] - [(6.216155 \times 10^{-7}) X^5]$$

where X = % Load of Group 001, when X ≥ 30% and < 100%

For X = 100%, X = 100

For X < 30%, lbs/hour SO₂ = (lbs/hour SO₂ at X = 30)(X/30)

Regression Equation 2

$$\text{Lbs/hour SO}_2 = 46.2846 + 8.61799 X - 0.295625 X^2 + [(5.22919 \times 10^{-3}) X^3] - [(3.83417 \times 10^{-5}) X^4] + [(9.382611 \times 10^{-8}) X^5]$$

where X = % Load of Group 001, when X ≥ 30% and < 100%

For X = 100%, X = 100

For X < 30%, lbs/hour SO₂ = (lbs/hour SO₂ at X = 30)(X/30)

Regression Equation 3

$$\text{Lbs/hour SO}_2 = 272.2042 - 32.885496 X + 1.839104 X^2 - 0.0384732 X^3 + [(3.5301 \times 10^{-4}) X^4] - [(1.1877 \times 10^{-6}) X^5]$$

where X = % Load of Group 001, when X ≥ 30% and < 100%

For X = 100%, X = 100

For X < 30%, lbs/hour SO₂ = (lbs/hour SO₂ at X = 30)(X/30)

Regression Equation 4

$$\text{Lbs/hour SO}_2 = 980.8598 - 82.991667 X + 2.979598 X^2 - 0.0471137 X^3 + [(3.5006 \times 10^{-4}) X^4] - [(9.970125 \times 10^{-7}) X^5]$$

where X = % Load of Group 001, when X ≥ 30% and < 100%

For X = 100%, X = 100

For X < 30%, lbs/hour SO₂ = (lbs/hour SO₂ at X = 30)(X/30)

Regression Equation 5

$$\text{Lbs/hour SO}_2 = -781.00 + 71.852078 X - 2.037781 X^2 + 0.0281917 X^3 - [(1.90495 \times 10^{-4}) X^4] + [(5.04111 \times 10^{-7}) X^5]$$

where X = % Load of Group 001, when $X \geq 30\%$ and $< 100\%$

For $X = 100\%$, $X = 100$

For $X < 30\%$, $\text{lbs/hour SO}_2 = (\text{lbs/hour SO}_2 \text{ at } X = 30)(X/30)$

Regression Equation 6

$$\text{Lbs/hour SO}_2 = -523.91 + 41.871645 X - 0.833163 X^2 + [(7.26395 \times 10^{-3}) X^3] - [(2.33717 \times 10^{-5}) X^4]$$

where X = % Load of Group 001, when $X \geq 30\%$ and $< 100\%$

For $X = 100\%$, $X = 100$

For $X < 30\%$, $\text{lbs/hour SO}_2 = (\text{lbs/hour SO}_2 \text{ at } X = 30)(X/30)$

Regression Equation 7

$$\text{Lbs/hour SO}_2 = 671.8081 - 0.0488057 X + [(1.584654 \times 10^{-6}) X^2] - [(2.44907 \times 10^{-11}) X^3] + [(1.832364 \times 10^{-16}) X^4] - [(5.26303 \times 10^{-22}) X^5]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ $\text{lbs/hour SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

Regression Equation 8

$$\text{Lbs/hour SO}_2 = 97.9805 + [(2.44788 \times 10^{-3}) X] - [(3.454422 \times 10^{-8}) X^2] + [(5.482064 \times 10^{-14}) X^3] + [(6.73349 \times 10^{-18}) X^4] - [(4.48867 \times 10^{-23}) X^5]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ $\text{lbs/hour SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

Regression Equation 9

$$\text{Lbs/hour SO}_2 = 670.1254 - 0.0617589 X + [(2.444266 \times 10^{-6}) X^2] - [(4.13817 \times 10^{-11}) X^3] + [(3.2021 \times 10^{-16}) X^4] - [(9.26922 \times 10^{-22}) X^5]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ $\text{lbs/hour SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

Regression Equation 10

$$\text{Lbs/hour SO}_2 = 970.4049 - 0.0709409 X + [(2.20629 \times 10^{-6}) X^2] - [(3.02779 \times 10^{-11}) X^3] + [(1.95714 \times 10^{-16}) X^4] - [(4.85393 \times 10^{-22}) X^5]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ $\text{lbs/hour SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

Regression Equation 11

$$\text{Lbs/hour SO}_2 = -819.36 + 0.064791 X - [(1.59705 \times 10^{-6}) X^2] + [(1.92298 \times 10^{-11}) X^3] - [(1.13243 \times 10^{-16}) X^4] + [(2.61498 \times 10^{-22}) X^5]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ $\text{lbs/hour SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

Regression Equation 12

$$\text{Lbs/hour SO}_2 = -554.982 + 0.038064 X - [(6.643551 \times 10^{-7}) X^2] + [(5.097686 \times 10^{-12}) X^3] - [(1.44771 \times 10^{-17}) X^4]$$

where X = flowrate (ACFM) from common boiler stack

$X \geq 34,888$ and $< 110,379$

for $X < 34,888$ lbs/hour $\text{SO}_2 = (\text{lbs/hour at } X = 34,888) (X/34,888)$

APPENDIX C– Insignificant Activities

Facility Name: Mayo Medical Center - Rochester

Permit Number: 10900084-001

Insignificant Activities and Applicable Requirements

| Minn. R. 7007.1300, subpart (except as noted) | Rule Description of the Activity | Applicable Requirement |
|--|---|--|
| 3(F) | Cleaning operations: commercial laundries, not including dry cleaners and industrial launderers. <ul style="list-style-type: none">• 2 laundry dryers at Charter House | Minn. R. 7011.0610 |
| 3(G) | Emissions from a laboratory, as defined in the subpart. <ul style="list-style-type: none">• There are numerous laboratories throughout the Downtown Campus experimental study, teaching, testing of drugs, chemicals, and chemical compounds | Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715 |
| 3(H) | Miscellaneous | Minn. R. 7011.0610 + Minn. R. 7011.0710/0715 |
| | 3. brazing, soldering, or welding equipment <ul style="list-style-type: none">• Various pieces of welding and soldering equipment are located around the campus | |
| 3(K) | Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source, such as spray painting of buildings, machinery, vehicles, and other supporting equipment. <ul style="list-style-type: none">• A small paint booth at Charter House is used infrequently with spray paint in aerosol cans | Minn. R. 7011.0710/0715 |

| Minn. R. 7007.130 0, subpart (except as noted) | Rule Description of the Activity | Applicable Requirement |
|---|--|---|
| 4 | <p>Emissions units with emissions less than all the following limits but not included in subpart 2:</p> <p>A. potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide;</p> <p>B. potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; and</p> <p>C. for hazardous air pollutants, emissions units with: (1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subpart 5; or (2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the following HAPs: carbon tetrachloride; 1,2-dibromo-3-chloropropane; ethylene dibromide; hexachlorobenzene; polycyclic organic matter; antimony compounds; arsenic compounds, including inorganic arsine; cadmium compounds; chromium compounds; lead compounds; manganese compounds; mercury compounds; nickel compounds; selenium compounds; 2,3,7,8-tetrachlorodibenzo-p-dioxin; or dibenzofuran.</p> <p><u>Mayo Building</u></p> <ul style="list-style-type: none"> • Electrical Shop Parts Cleaner • Plumbing Shop Parts Cleaner • Hickman Cell • Fixer Tank A and B • Fixer Mix Tank • Fixer Holding Tank | <p>Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715</p> <p>NOTE: All storage vessels (as defined at Minn. R. 7011.1500, subp. 11) are subject to Minn. R. 7011.1500-7011.1520</p> |

| Minn. R. 7007.130 0, subpart (except as noted) | Rule Description of the Activity | Applicable Requirement |
|---|--|---|
| 4 (cont'd) | <p><u>Siebens Building</u></p> <ul style="list-style-type: none"> Emergency Pump (0.39 MMBtu/hr gasoline) <p><u>Medical Sciences Building</u></p> <ul style="list-style-type: none"> Lead Pot Lead Working Lacquer Thinner Ink Cleaning Decalcifying Degreasing Sandblaster No. 1 Sandblaster No. 2 Ink Remover Use Acetic Acid Use Xylene <p><u>Medical Sciences Building</u> 6,000 gal Waste Solvent Tank</p> <p><u>Franklin Cabinet Shop</u></p> <ul style="list-style-type: none"> Lacquer Thinning Gluing <p><u>Franklin Heating Station</u></p> <ul style="list-style-type: none"> Two 150,000 gal No. 6 Fuel Oil Tanks Three 4,500 gal No. 2 Fuel Oil Tanks Flux Cleaning Sandblaster Parts Cleaner Degreasing Marley Cooling Tower (372 MGal/hr) EU028's Cooling Tower (40 MGal/hr) EU029's Cooling Tower (40 MGal/hr) <p><u>College Apartments</u></p> <ul style="list-style-type: none"> Boiler (2.1 MMBtu/hr natural gas) <p><u>Methodist Hospital</u></p> <ul style="list-style-type: none"> Parts Lubrication 10,000 gal No.2 Fuel Oil Tank Parts Washer | <p>Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715</p> <p>NOTE: The 6,000 gallon waste solvent tank at the Medical Sciences Building is periodically subject to Minn. R. 7011.1500 – 7011.1520, depending on the contents of the tank at a given time.</p> |

| Minn. R. 7007.1300, subpart (except as noted) | Rule Description of the Activity | Applicable Requirement |
|---|---|---|
| 4 (cont'd) | <ul style="list-style-type: none"> • Gluing • Two Ethylene Oxide Sterilizers (For each, VOC PTE = 0.05 lb/hr, Ethylene Oxide PTE = 0.187 ton/yr) <p><u>Charter House</u></p> <ul style="list-style-type: none"> • Cooling Tower (0.48 MGal/hr) • Parts Cleaner <p><u>Ozmun Building</u></p> <ul style="list-style-type: none"> • 10,000 gal No. 2 Fuel Oil Tank • Fixed Emergency Generator (0.84 MMBtu/hr diesel fuel) • Portable Emergency Generator (0.84 MMBtu/hr diesel fuel) (Actual NO_x = 0.013 ton/yr) • Two Natural Gas/Distillate Oil Fired Boilers (6.921 MMBtu/hr, each) (For each, NO_x VOC PTE = 0.99 lb/hr) <p><u>Baldwin Building</u></p> <ul style="list-style-type: none"> • Printing Activities <p><u>Hilton Building</u></p> <ul style="list-style-type: none"> • Solvent Tank (VOC PTE = 0.031 lb/hr, HAP PTE = 0.180 ton/yr) <p><u>Prospect Utility Plant</u></p> <ul style="list-style-type: none"> • Cooling Tower (1080 MGal/yr) <p><u>Pavilion Building</u></p> <ul style="list-style-type: none"> • Boiler No. 1 (2.009 MMBtu/hr natural gas) • Boiler No. 2 (2.009 MMBtu/hr natural gas) • Diesel Emergency Generator (0.84 MMBtu/hr) • Natural Gas Emergency Generator (0.15 MMBtu/hr) <p><u>Massey Building</u></p> <ul style="list-style-type: none"> • Boiler No. 1 (0.366 MMBtu/hr natural gas) | <p>Minn. R. 7011.0510/0515 + Minn. R. 7011.0610 + Minn. R. 7011.0710/0715</p> |

| Minn. R. 7007.130 0, subpart (except as noted) | Rule Description of the Activity | Applicable Requirement |
|---|--|-------------------------|
| 4 (cont'd) | <ul style="list-style-type: none"> Boiler No. 2 (0.366 MMBtu/hr natural gas) Boiler No. 2 (0.366 MMBtu/hr natural gas) <u>Cliffs House Apartments</u> <ul style="list-style-type: none"> Boiler (0.525 MMBtu/hr natural gas) <u>Graham Building</u> <ul style="list-style-type: none"> Boiler No. 1 (0.3 MMBtu/hr natural gas) Boiler No. 2 (0.3 MMBtu/hr natural gas) <u>West Employee Ramp</u> <ul style="list-style-type: none"> Emergency Generator (0.84 MMBtu/hr diesel fuel) <u>MRI Research Center</u> <ul style="list-style-type: none"> North Boiler (0.36 MMBtu/hr) South Boiler (0.288 MMBtu/hr) | |
| Minn. R. 7008.411 0 | <p>Processing operations</p> <p>2. Equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM₁₀) inside a building, provided that emissions from the equipment are:</p> <p>a). filtered through an air cleaning system; and</p> <p>b). vented inside of the building 100% of the time.</p> <ul style="list-style-type: none"> 2nd Floor Franklin Carpenter Shop | Minn. R. 7011.0710/0715 |

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 10900084-001

This technical support document is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

| Applicant/Address | Stationary Source/Address (SIC Code: 8062) |
|--|--|
| Mayo Foundation 200 First Street Southwest Rochester, MN 55905 | Mayo Clinic – Rochester, MN 200 First Street Southwest Rochester, MN 55905 |
| Contact: David Senjem Phone: (507) 284-8890 | |

1.2. Description of the Permit Action

Mayo Clinic – Rochester, MN (Mayo Clinic) is a health care facility located in Rochester, Minnesota. The “facility” permitted in this document includes all buildings owned and/or operated by the Mayo Foundation in downtown Rochester, Minnesota, located on contiguous property with the Franklin Heating Station, Rochester Methodist Hospital, and the Prospect Utility Plant.

The non insignificant emission units at the facility consist of the following (see Appendix C to the permit for a listing of insignificant activities located at the Mayo facility):

Franklin Heating Station

- Three boilers, each capable of burning natural gas, No. 2 fuel oil, and No. 6 fuel oil (which includes small amounts of waste oil) (EU 024, EU 026, EU 027)
- One boiler capable of burning natural gas (and permitted to burn No. 2 fuel oil) (EU 025)
- One paint booth (EU 004)
- Wood sanding operations in paint booth (EU 006)
- Metal sanding operations in paint booth (EU 007)
- Two diesel-powered generators (EU 028, EU 029)
- Two cooling towers (EU 031, EU 033)

Rochester Methodist Hospital

- One paint booth (EU 009)
- Three diesel-powered emergency generators (EU 011, EU 012, EU 013)

Prospect Utility Plant

- Four diesel-powered emergency generators (EU 058, EU 059, EU 060, EU 061)
- One boiler capable of burning No. 2 fuel oil (EU 062)

Boilers 3 and 4 at the Franklin Heating Station are controlled by a multiclone control device. However, because the multiclone is not needed for compliance purposes, Mayo requested that provisions pertaining to its operation be removed from the Title V permit. Because operation of the multiclone is not required, the facility cannot account for its operation when calculating actual emissions for inventory purposes.

The Franklin Heating Station has an accordion filter control for the paint booth (which also includes wood and metal sanding operations). However, a hood capture efficiency has not been determined for the system. Therefore, the booth is considered to be uncontrolled for permitting and annual emissions inventory calculation purposes. The same is true for the paint booth at the Rochester Methodist Hospital.

While Mayo Clinic is owned and operated by the Mayo Foundation, it is not contiguous with other Mayo facilities in Rochester (ie., Saint Marys Hospital and the Waste Management Facility), and thus is a separate source under the New Source Review and Part 70 regulations. This permit is a Part 70 operating permit. The facility is an existing major source under New Source Review. No new modifications are approved through this permit (a previously approved modification to Boiler No. 2 at the Franklin Heating Station is included in the permit). The facility is not a major source of HAP emissions, by virtue of accepting a synthetic minor limit.

The facility is located in an area that was previously designated as non-attainment for SO₂. However, the area currently meets the ambient air quality standards, and was officially redesignated as "attainment" on May 8, 2001. The facility has been subject to a federally enforceable permit (part of Minnesota's state implementation plan, or SIP, for attaining ambient air quality standards) containing requirements contributing to the correction of the non-attainment problem and the ultimate redesignation. The requirements of that permit have been incorporated into this permit as non-expiring Title I conditions. This permit will ultimately replace the existing permit and be incorporated into the SIP (separately from the permit issuance process).

This permit action incorporates all past modifications and emission unit limitations into one comprehensive air emissions operating permit under Minn. R. ch. 7007.

1.3 Description of any Changes Allowed with this Permit Issuance

Other than those authorized by previous permitting actions, no equipment changes or construction activities are authorized by the permitting action.

1.4 Permit History

| Permit Number and Issuance Date | Action Authorized |
|--|---|
| 1148-83-OT-1 Amendment No. 2 June 19, 1998 | Franklin Heating Station: <ul style="list-style-type: none">• Delete derating of four boilers• Delete listed fuel types |
| 10900084-004 May 25, 2001 | Prospect Utility Plant – Installation/operation of 4 emergency generators. |
| 10900084-005 August 20, 2002 | Prospect Utility Plant – Installation/operation of 79 MMBtu/hr boiler limited to 0.05% sulfur in fuel oil and 3.5 MM gallons per year. |
| 10900084-006 May 19, 2003 | Prospect Utility Plant: <ul style="list-style-type: none">• Limit generator emissions to ≤ 0.2 lb/MMBtu• Limit sum of operating hours to ≤ 400 hours per 12-month rolling sum• Add condition that the distillate-fired boiler will be removed upon commencement of steam being supplied to the Prospect Utility Plant and distributed to the Mayo campus. |
| 10900084-001 Part 70 Operating Permit | Current Permit Action |

1.5. Facility Emissions:

Table 1 provides a summary of the total facility limited potential emissions. See Attachment 1 for detailed emission calculations.

Table 1. Total Facility Potential to Emit Summary

| | PM tpy | PM ₁₀ tpy | SO ₂ tpy | NO _x tpy | CO tpy | VOC tpy | Sulfuric Acid Mist tpy | Single HAP tpy | All HAPs tpy |
|--|-----------|-------------------------|------------------------|------------------------|-----------|------------|------------------------------------|----------------------|--------------------|
| Total Facility Limited Potential Emissions | 407 | 348 | 3867 | 803 | 215 | 155 | 141 | 9 | 12 |
| Total Facility Actual Emissions (2002)* | 8 | 7 | 22 | 335 | 131 | 20 | Not reported in emission inventory | | |

* Obtained from MPCA website database of the Minnesota Criteria Pollutant Emission Inventory.

Table 2. Facility Classification

| Classification | Major/Affected Source | Synthetic Minor | Minor |
|------------------------|------------------------------|------------------------|--------------|
| PSD | YES | | |
| Part 70 Permit Program | YES | | |
| Part 63 NESHAP | | YES | |

This permit authorizes no changes that result in an emissions increase.

2. Regulatory and/or Statutory Basis

New Source Review

The facility is an existing major source under New Source Review regulations. No new changes are authorized by this permit.

Burner replacements in Boilers 1, 2, 3, and 4 (Franklin Heating Station – EU 024, EU 025, EU 026, EU 027) in 2003, 1991, 1987, and 1986 could potentially have triggered New Source Review (NSR) requirements. The replacement burners for Boilers 1, 3, and 4 each had a heat input capacity greater than that of the burner which was replaced. The replacement burner for Boiler 2 has a heat input capacity less than that of the burner that was replaced. The capacities of each of the boilers are physically limited by the steam production capability of the units. Therefore, the burner replacements are like-kind replacement routine maintenance and are exempt from NSR requirements.

A modification of Boiler 2 at the Franklin Heating Station has been preauthorized by past permitting actions. The modification was synthetic minored for SO₂ purposes, but no determination of the associated NO_x emissions increase can be made until prior to project commencement. Therefore, a permit term has been included to require the evaluation of the increase in NO_x emissions, using the current NSR calculation methodology, prior to beginning construction. If the increase is a natural minor for NSR purposes, the evaluation must be included as part of the Notification of the Date Construction Began required by the permit. If the NO_x increase is major, the facility will be required to obtain a major permit amendment prior to commencing construction on the project.

National Ambient Air Quality Standards (NAAQS)

Because the facility was identified as a potentially-culpable source in the Rochester SO₂ nonattainment area, the facility is subject to limitations on fuel usage that restricts the SO₂ emissions from the facility. These restrictions have been submitted as part of Minnesota's State Implementation Plan for SO₂ through Amendment No. 2 to Air Emission Permit No. 1148-83-OT-12, which was issued on June 19, 1998. These restrictions are non-expiring Title I conditions, and have been carried forward into this permit. The Rochester area is no longer considered a nonattainment area. The existing permit (to be replaced by this permit) that currently is part of the SIP and which contains the Title I SIP conditions, is included as Attachment 2 to this technical support document.

Part 70 Permit Program

The facility is a major source under the Part 70 permit program, since permitted emissions of CO, NO_x, PM, PM₁₀, and SO₂ exceed 100 tons per year.

New Source Performance Standards (NSPS)

Portions of the facility are subject to the following New Source Performance Standards contained in 40 CFR Part 60:

- Upon alteration to allow the combustion of No. 2 fuel oil, Boiler No. 2 (Franklin Heating Station – EU 025) will be subject to the requirements of either:

Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (60.40b – 60.49b),

or, if the boiler is derated,

Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (60.40c – 60.48c).

- Burner replacements in Boilers 1, 2, 3, and 4 in 2003, 1991, 1987, and 1986 could potentially have triggered New Source Performance Standards (NSPS) requirements. The facility maintains that the burner replacements were routine, like-kind replacements common for boiler combusting No. 6 fuel oil and, therefore, were not modifications for NSPS purposes.
- Two 150,000 gallon No. 6 fuel oil tanks, are potentially subject to the recordkeeping provisions of Subpart Kb. However, in a rulemaking dated October 15, 2003 (Federal Register Volume 68, Number 199, pages 59328-59333) revised the provisions of Subpart Kb such that the subpart does not apply to tanks with volumes greater than 151 m³ (39,890 gal) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (0.5 psia). The vapor pressure of No. 6 fuel oil, obtained from EPA's TANKS 4.09b) is 0.0001 psia at 85 °F. Therefore, Subpart Kb is not applicable to the two No. 6 fuel oil storage tanks.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility has accepted a limit on HAP emissions such that it is a non-major source under 40 CFR pt. 63. First, total paint usage for the two paint booths is limited to 5 tons per year on a 12-month rolling sum basis, calculated monthly. If the total paint usage 12-month rolling sum exceeds 4.9 tons per year in any month, the facility can calculate actual HAP emissions based on paint HAP content and actual paint usage. The 5 tons per year HAP limit ensures that the facility potential to emit is less than 10 tons per year for each individual HAP and 25 tons per year for total HAP. Therefore, the facility is not classified as a major source for purposes of 40 CFR Part 63 and no NESHAPs apply.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0075 Control Equipment General Requirements
- Minn. R. 7011.0080 Monitoring and Recordkeeping For Listed Control Equipment
- Minn. R. 7011.0505 Determination of Applicable Standards of Performance
- Minn. R. 7011.0510 Standards of Performance for Existing Indirect Heating Equipment
- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment (if Boiler No. 2 is altered to accommodate No. 2 fuel oil)
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.1505 – Standards of Performance for Storage Vessels
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

Table 3 provides a summary of the significant sources of emissions and the applicable regulations and standards.

Table 3. Regulatory Overview of Facility

| EU, GP, or SV | Applicable Regulations | Comments: |
|----------------------|--|--|
| Facility | General Terms Applicable to All Facilities | The general permit requirements applicable to all facilities were included. |
| GP 001 GP 006 | Title I – SIP conditions | Each of these units is subject to conditions contained in the State Implementation Plan for SO ₂ . The MPCA considers that the No. 6 fuel oil combusted in the GP 001 boilers includes the small amounts of waste oil periodically added to the fuel. |
| GP 001 | 40 CFR § 51.165 and interpretive memorandum | Pollution Control Project exemption from NSR (past project, authorized prior to NSR reforms for pollution control projects) |
| GP 001 | Minn. R. 7007.0800 Minn. R. 7009.0020 Minn. R. 7011.0505 Minn. R. 7017 40 CFR Section 60.13(d)(1) | Recordkeeping of No. 2 fuel oil consumption, requirements if the Permittee decides to install CEMs for SO ₂ and stack gas flowrate, and limits for sulfur dioxide set lower than that allowed by the applicable performance standard to ensure emissions do not cause a violation of ambient standards. |
| GP 002 | Minn. R. 7011.0510 | Standards of Performance for Existing Indirect Heating Equipment. Determination of applicable limit from rule: <ul style="list-style-type: none"> • the units were constructed in 1952 and 1968; |

| EU, GP, or SV | Applicable Regulations | Comments: |
|---|--|---|
| | Minn. R. 7011.0070 | <ul style="list-style-type: none"> the facility is located outside the cities in Table I; each unit capacity is less than 250 MMBtu/hr; and the facility has greater than 250 MMBtu/hr of indirect heating equipment. Operate and maintain control equipment. |
| GP 003 | Title I – 40 CFR pt. 52 Minn. R. 7011.2300 Minn. R. 7017.2020 Minn. R. 7007.0800 | Avoid Classification as Major Modification for NO _x and not cause or contribute to air quality violation for SO ₂ Standard of Performance for Stationary Internal Combustion Engines Performance test plan development requirement Limits generators to emergency use only |
| GP 004 | Title I – 40 CFR pt. 63 Minn. R. 7011.0070 Minn. R. 7011.0715 Minn. R. 7007.0800 | Avoid Classification as Major Source of Hazardous Air Pollutants Prior to taking credit for filter control efficiency, hood(s) must be certified Standards of Performance for Post-1969 Industrial Process Equipment Recordkeeping, inspection of panel filters |
| GP 005 | Minn. R. 7011.2300 Minn. R. 7011.0800 | Standard of Performance for Stationary Internal Combustion Engines Hours of operation recordkeeping to ensure emergency use only |
| GP 006 | Minn. R. 7011.2300 | Standard of Performance for Stationary Internal Combustion Engines |
| GP 007 | Minn. R. 7011.0715 | Standards of Performance for Post-1969 Industrial Process Equipment |
| EU 025 (using natural gas only) | Minn. R. 7011.0510 | Standards of Performance for Existing Indirect Heating Equipment. Determination of applicable limit from rule: <ul style="list-style-type: none"> the unit was constructed in 1952; the facility is located outside the cities in Table I; the unit capacity is less than 250 MMBtu/hr; and the facility has greater than 250 MMBtu/hr of indirect heating equipment. |
| EU 025 (modified to burn No. 2 oil and derated) | Minn. R. 7007.0150 Minn. R. 7007.0800 Title I – 40 CFR pt. 52 40 CFR pt. 60, subp. A and Dc | Permittee preauthorized to modify boiler Limit to avoid 40 CFR pt. 60, subp. Db Avoid Classification as Major Modification for SO ₂ , demonstrate not major for NO _x Modification Triggers Applicability |
| EU 025 (modified) | Title I – 40 CFR pt. 52 | Avoid Classification as Major Modification for SO ₂ , demonstrate not major for NO _x |

| EU, GP, or SV | Applicable Regulations | Comments: |
|--------------------|---|---|
| to burn No. 2 oil) | 40 CFR pt. 60, subp. A and Db Minn. R. 7017.1060, 1080, 1110, 1130, 1170, 1180, 1200, 1210, 1220 | Modification Triggers Applicability Initial CEMS and COMS certification, monitor evaluations, and recordkeeping requirements |
| EU 062 | Title I – 40 CFR pt. 52 40 CFR pt. 60, subp. A and Dc Minn. R. 7011.0515 | Avoid Classification as Major Modification and not cause or contribute to air quality violation Modification Triggers Applicability Standards of Performance for New Indirect Heating Equipment. Determination of applicable limit from rule: <ul style="list-style-type: none"> • the unit was constructed after January 31, 1977; • the facility is located outside the cities in Table I; • the unit capacity is less than 250 MMBtu/hr; and • the facility has greater than 250 MMBtu/hr of indirect heating equipment. |
| CE 001 | Minn. R. 7011.0075 Minn. R. 7011.0080 | Control Equipment General Requirements Monitoring and Recordkeeping for Listed Control Equipment and Corrective Actions |

3. Technical Information

Uncertified Hoods and Industrial Process Equipment Rule

The facility operates two paint booths, one of which includes wood and metal sanding operations. The emissions generated in each of the paint booths is captured by a hood and routed through filters prior to being exhausted to the atmosphere. However, the facility has not performed hood certifications on any of the equipment. Therefore, the capture and control provided by the hoods and filters cannot be included in calculating actual emissions for inventory purposes or for demonstrating compliance.

Regardless of whether the hoods are certified, they are operating and achieving some degree of capture. For purposes of determining whether stack testing is required on these units, one must look at the controlled emissions compared to the emissions allowed under the Industrial Process Equipment Rule (IPER). [The minutes from a September 13, 2000 combined air quality lateral-leads discussion pertaining to spray booths that are not totally enclosed show the conclusion that although IPER applies to all process emissions regardless of where the emissions are vented, only the emissions that can be accurately measured through stack testing should be used to establish compliance. Although the conclusion was based on spray booths only, it's being applied here to the wood and metal sanding booths, as well.] "Worst case" stack emissions occur under the conditions of 100% capture by the hood combined with 92% efficiency of the panel filters. That calculation yields estimated worst case controlled emissions well below the IPER limit. [As a note, the minutes also conclude that the emissions inventory for these

operations will have to be based on no capture or control, thereby creating a disincentive for not certifying the hoods.]

FHS Boiler No. 3 and Boiler No. 4 Cyclones

Boiler No. 3 and Boiler No. 4 at the Franklin Heating Station are equipped with cyclone for particulate control from the units (EU 026 and EU 027, respectively). The permittee requested that the control equipment not be included in the permit because they are not necessary in order for the facility to demonstrate compliance with applicable requirements. Therefore, use of the control equipment cannot be accounted for when calculating actual emissions for inventory purposes.

3.1 Calculations of Potential to Emit

Attachment 1 to this TSD contains a summary of the PTE of the Facility, along with detailed spreadsheets and supporting information prepared by the MPCA and the Permittee.

The permit does not authorize any changes/modifications other than the modification preauthorized by a previous permitting action.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

| Emission Unit or Group | Requirement (basis) | Additional Monitoring | Discussion |
|-------------------------------|---|------------------------------|---|
| GP 002 | PM: ≤ 0.6 lb/MMBtu (Minn. R. 7011.0510) | None | Each unit uses natural gas, No. 2 fuel oil, and No. 6 fuel oil; therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by only burning the allowable fuels. Design based PM PTE for each unit, using AP-42, is 0.0072 lb/MMBtu for natural gas, 0.02 lb/MMBtu for No. 2 fuel oil, and 0.14 lb/MM Btu for No. 6 fuel oil compared to the rule limit of 0.6 lb/MMBtu. |
| | SO ₂ : ≤ 2.0 b/MMBtu (Minn. R. 7011.0510) | None | Monitoring requirements for GP 001 are adequate for periodic monitoring purposes. |
| | Opacity: ≤ 20 % with exceptions (Minn. R. 7011.0510) | None | Opacity is typically not an issue if the equipment is operated properly on clean fuel. |
| GP 003 | NO _x : ≤ 3.84 lb/MMBtu (Title I Condition) | None | NO _x emissions are typically not an issue if the equipment is operated properly on clean fuel. Design based PTE for the units, using AP-42, is 3.2 compared to the permit limit of 3.84 lb/MMBtu. Based on previous stack test results, low usage, and the fact that the permitted emission limit is higher than the AP-42 emission factor, no testing is deemed necessary. It would be counterproductive to operate a generator for the sole purpose of testing in this case. |
| | SO ₂ : ≤ 0.2 lb/MMBtu (Title I Condition) | Recordkeeping | The Permittee must have an analysis of the fuel oil burned in Emission Units 058, 059, 060, and 061 using one of two methods included in the permit. |
| | Opacity: ≤ 20 % once operating temperatures | None | Opacity is typically not an issue if the equipment is operated properly on clean fuel. Testing is not required, because it is counterproductive to operate a generator for the sole purpose of testing |

| Emission Unit or Group | Requirement (basis) | Additional Monitoring | Discussion |
|------------------------|--|-----------------------|--|
| | established (Minn. R. 7011.2300) | | opacity. |
| | Hours of Operation: \leq 400 hours per year total for the four units | Recordkeeping | The Permittee must record hours operated each month for unit(s) is operated. |
| GP 004 | PM: \leq 0.3 gr/dscf Opacity: \leq 20 % with exceptions (Minn. R. 7011.0715) | None | Given the characteristics of paint and sanding booth emissions, the likelihood of violating either of these emission limits is very small. |
| | HAP: \leq 5 tpy (Title I Condition) | Recordkeeping | Based on monthly calculations of 12-month rolling sum of paint usage (or, alternately, actual HAP emissions), the facility will demonstrate that they are a synthetic minor source for purposes of 40 CFR Part 63. |
| GP 005 | SO ₂ : \leq 0.5 lb/MMBtu (Minn. R. 7011.2300) | Recordkeeping | The Permittee must have an analysis of the fuel oil burned in Emission Units 011, 012, and 013 using one of two methods included in the permit. |
| | Opacity: \leq 20 % once operating temperatures established (Minn. R. 7011.2300) | None | Opacity is typically not an issue if the equipment is operated properly on clean fuel. Testing is not required, because it is counterproductive to operate a generator for the sole purpose of testing opacity. |
| | Hours of Operation: <u>qualify as emergency</u> | Recordkeeping | The Permittee must maintain documentation that each unit is an emergency generator. |

| Emission Unit or Group | Requirement (basis) | Additional Monitoring | Discussion |
|---|---|------------------------------|---|
| GP 006 | SO ₂ : < 0.5 lb/MMBtu (Minn. R. 7011.2300) | Recordkeeping | The Permittee must have an analysis of the fuel oil burned in Emission Units 028 and 029 using one of two methods included in the permit. |
| | Opacity: ≤ 20 % once operating temperatures established (Minn. R. 7011.2300) | None | Opacity is typically not an issue if the equipment is operated properly on clean fuel. Testing is not required, because it is counterproductive to operate a generator for the sole purpose of testing opacity. |
| GP 007 | PM: < 0.3 gr/dscf Opacity: < 20 % with exceptions (Minn. R. 7011.0715) | None | Given the characteristics of cooling tower emissions, the likelihood of violating either of these emission limits is very small. Design based PTE for each unit, using AP-42, is less than 0.002 gr/dscf compared to the rule limit of 0.020 gr/dscf for EU 031 and EU 033. |
| EU 025 (burning natural gas only) | PM: < 0.6 lb/MMBtu Opacity: < 20 % with exceptions (Minn. R. 7011.0510) | None | The unit uses natural gas; therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by only burning natural gas. Design based PTE for each unit, using AP-42, is 0.0072 compared to the rule limit of 0.6 lb/MMBtu. |
| EU 025 (burning natural gas or No. 2 fuel oil) | PM: < 0.4 lb/MMBtu Opacity: < 20 % with exceptions (Minn. R. 7011.0515) | None | The unit uses natural gas or fuel oil; therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by only burning natural gas or No. 2 fuel oil. Design based PTE for each unit, using AP-42, is 0.0072 for natural gas and 0.02 for No. 2 fuel oil compared to the rule limit of 0.6 lb/MMBtu. |
| | SO ₂ : < 39 tons per year and fuel oil sulfur | Recordkeeping | The Permittee must have an analysis of the fuel oil burned in Emission Unit 025 using one of two methods included in the permit. Permittee must |

| Emission Unit or Group | Requirement (basis) | Additional Monitoring | Discussion |
|-------------------------------|--|---|---|
| | content < 0.5% by weight (Title I Condition and 40 CFR Section 60.42c(d) or 60.42b(a)) | | also calculate and track annual SO ₂ emissions. |
| | NOx < 0.1 lb/MMBtu | None | 40 CFR Part 60, Subpart Db requires installation of a NOx CEM that would meet the periodic monitoring requirements. |
| EU 062 | PM: < 0.4 lb/MMBtu SO2 < 2.0 lb/MMBtu (Minn. R. 7011.0515)Opa city: < 20 % with exceptions (Minn. R. 7011.0515, 40 CFR Part 60, Subpart Dc) | None | The unit uses natural gas or fuel oil; therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by only burning natural gas or No. 2 fuel oil. Design based PTE for each unit, using AP-42, is 0.0072 for natural gas and 0.02 for No. 2 fuel oil compared to the rule limit of 0.6 lb/MMBtu. |
| | Distillate Oil Use < 3,500,000 gal/yr | Recordkeeping | The Permittee must record gallons of distillate oil burned each month the unit is operated. |
| | Fuel Sulfur Content: < 0.05% by weight (Title I Condition, 40 CFR Part 60, Subpart Dc) | Recordkeeping | The Permittee must have an analysis of the fuel oil burned in Emission Unit 062 using one of two methods included in the permit. |
| CE 001 | Use of control equipment | Record pressure drop every 24 hours if in operation | Because the permittee accounted for the cyclones in calculation limited potential to emit, the facility must comply with the associated control equipment monitoring and recordkeeping |

| Emission Unit or Group | Requirement (basis) | Additional Monitoring | Discussion |
|-------------------------------|----------------------------|------------------------------|-------------------|
| | | | requirements. |

3.3 Insignificant Activities

Mayo Clinic has several operations which are classified as insignificant activities. These are listed in Appendix C to the permit. Emission calculations were not requested for the majority of the listed items because they are insignificant activities by virtue of their design and capacity, as provided by Mayo Clinic. Exceptions are the 0.84 MMBtu/hr emergency and portable diesel generators at the Ozmun Building, Pavilion Building, and the West Employee Ramp and the 0.39 MMBtu/hr gasoline-powered backup pump at the Siebens Building, which are insignificant because of actual emissions. Based on emissions information provided by Mayo Clinic, actual emissions for the units ranged from 0.001 tpy for particulate matter to 0.013 tpy for NOx. Because the units are portable and past actual emissions are so low, the likelihood of the units emitting at significant levels is very small. Therefore, no periodic monitoring for these or any other insignificant activity is included in the permit.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.5 Comments Received

During the 30-day comment period, comments were received from the Mayo Clinic – Rochester, the Mille Lacs Band of Ojibwe, and EPA Region 5. While many of the comments were editorial in nature, a number of the comments did result in revised permit terms. The three items of comment correspondence are attached to this document (Attachment 4), along with a summary of actions taken to resolve the comments. Rather than summarizing the revisions to the permit here, the reader is directed to the attached response letters.

4. Conclusion

Based on the information provided by Mayo Clinic, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 10900084-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Permit Team:

| | |
|---------------------|---------------------------------------|
| Permit Engineer | M. Kirk Dunbar, HDR Engineering, Inc. |
| MPCA staff Engineer | Toni Volkmeier |
| Enforcement | Greg Berger |
| Stack Testing | Dan Brady |
| Peer Review | Dave Beil |

Attachments:

1. PTE Summary and Calculation Spreadsheets
2. Facility Description and CD-01 Forms
3. Copy of Existing Permit with Title I SIP Conditions
4. Comments Received During Public Notice Period; Response to Public Comments