

**AIR EMISSION PERMIT NO. 14500003- 005  
(Part 70 Reissuance)**

**IS ISSUED TO**

Melrose Dairy Proteins LLC

**MELROSE DAIRY PROTEINS LLC**

1000 Kraft Drive East  
Melrose, Stearns County, MN 56352

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

Permit Type  
Part 70 Operating Permit - Reiss

Application Date  
1/29/2003

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/Limits to Avoid NSR

**Issue Date:** November 8, 2006

**Expiration:** November 8, 2011  
All Title I Conditions do not expire.

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Richard J. Sandberg, Manager  
Air Quality Permits Section  
Industrial Division

for Brad Moore  
Acting 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:**

Melrose Dairy Proteins LLC operates a cheese manufacturing plant and ethanol production facility in Melrose, Minnesota. The primary capability of the plant consists of the manufacture of natural cheeses, including parmesan, Romano, and cheddar. A portion of the by-products from the cheese-making process are fermented and distilled to produce denatured ethanol.

The portion of the facility that produces ethanol is subject to federal PSD regulations when potential emissions reach 100 tons per year of any criteria pollutant. The capacity of the ethanol production facility is such that potential controlled emissions of all criteria pollutants produced by the production of ethanol are less than 100 tons per year. The facility as a whole (ethanol production plus cheese production) is subject to PSD when potential emissions reach 250 tons per year of any criteria pollutant. The permit contains conditions such that potential emissions of all criteria pollutants are less than 250 tons per year. Since the potential emissions of the facility as a whole exceed 100 tons per year, the facility is subject to Part 70 permitting requirements.

This permit is a reissuance of the Facility's Part 70 operating permit which was first issued July 28, 1998. Also included in this permit action is a major amendment to adjust the volatile organic compounds limit to reflect changes in State testing requirements.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-1

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

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

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

<b>What to do</b>	<b>Why to do it</b>
<b>SOURCE-SPECIFIC REQUIREMENTS</b>	hdr
Production: less than or equal to 3000000 gallons/year using 12-month Rolling Sum of ethanol (prior to addition of denaturant).	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record and maintain the total quantity of ethanol produced (prior to addition of denaturant) at the facility.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: By the 15th day of every month, record the gallons of ethanol produced during the previous month, and the gallons of ethanol produced during the previous 12 months (12-month rolling sum).	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
<b>OPERATIONAL REQUIREMENTS</b>	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0100-7009.0080.
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 control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices 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 practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
<b>PERFORMANCE TESTING</b>	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
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
<b>MONITORING REQUIREMENTS</b>	hdr

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-2**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

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)
<b>RECORDKEEPING</b>	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)
Record keeping: 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)
<b>REPORTING/SUBMITTALS</b>	hdr
Shutdowns: Notify the Commissioner at least 24 hours in advance of a planned shutdown, or as soon as possible after an unplanned shutdown of any process or control equipment, if the shutdown would cause an increase in the emission of any regulated air pollutant. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdowns: Notify the Commissioner within 24 hours after a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of any regulated air pollutant. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Application for Permit Reissuance: due 180 days before expiration of existing permit.	Minn. R. 7007.0400, subp. 2
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
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.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-3**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** GP 004 Residual Oil Usage**Associated Items:** EU 001 Boiler No. 1

EU 002 Boiler No. 2

EU 003 Boiler No. 3

What to do	Why to do it
A. OPERATING LIMITS	hdr
Fuel Usage: less than or equal to 1845000 gallons/year using 12-month Rolling Sum of residual fuel oil combusted by the boilers in GP 004.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Sulfur Content of Fuel: less than or equal to 1.5 percent by weight	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
B. RECORDKEEPING REQUIREMENTS	hdr
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record and maintain the total quantity of residual fuel oil combusted by boilers in GP004. Records shall be based on the actual amount of fuel combusted, as measured using an in-line flow meter.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: By the 15th day of each month, calculate and record the residual fuel oil use for the previous month and for the previous 12 months (12-month rolling sum). Records shall be based on the actual amount of fuel combusted, as measured using an in-line flow meter.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Recordkeeping: Maintain residual oil vendor certifications of the sulfur content (percent by weight) for all residual fuel oil combusted by the boilers in GP 004.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Melrose Dairy Proteins LLC  
Permit Number: 14500003 - 005

- Subject Item:** GP 005 Other Fuel Usage
- Associated Items:** EU 025 Maintenance Office Heating Unit  
EU 026 HTSH Control Room Space Heater  
EU 027 Separator Room Heater  
EU 028 Lab Heater  
EU 029 Waste Treatment Heater  
EU 030 Waste Treatment Heater  
EU 031 Waste Treatment Furnace  
EU 033 Emergency Generator

What to do	Why to do it
Fuel burned: Natural gas only.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2



**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-5**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** SV 003 Automatic cheese salter (CE001)**Associated Items:** EU 004 Automatic Cheese Salter

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. (PTE: 1.68 lbs/hour)	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Pressure Drop: greater than or equal to 1 inches of water column and less than or equal to 5 inches of water column , unless a new range is required to be set pursuant to Minn. R. 7017.2025, subp. 3. If a new range is required to be set, it will be based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Title I Condition: Limit taken to avoid classification as a major source under 40 CFR Section 52.21;Minn. R. 7007.0800, subp. 2 and 14
Water flow rate: greater than or equal to 25 gallons/minute , unless a new limit is required to be set pursuant to Minn. R. 7017.2025, subp. 3. If a new limit is required to be set, it will be based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Title I Condition: Limit taken to avoid classification as a major source under 40 CFR Section 52.21;Minn. R. 7007.0800, subp. 2 and 14
Each emission unit shall be controlled by the scrubber (CE 001) while in production operation ("on-line"). Equipment may only be "offline" while not in production operation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-6**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item: SV 004 Fermentation scrubber (CE002)****Associated Items:** EU 005 Fermentor No. 1

EU 006 Fermentor No. 2

EU 007 Fermentor No. 3

EU 008 Fermentor No. 4

EU 009 Fermentor No. 5

EU 010 Fermentor No. 6

EU 011 Pre-Fermentor

EU 012 Pre-Fermentor

EU 013 Yeast Tank

EU 014 Beer Still Vent

EU 015 Stripper Flux Vent

EU 016 Mol. Sieve Vacuum Receiver Vent

EU 017 Fermentor No. 7

EU 018 Beer Well

EU 019 Beer Well

EU 037 TK001 (Ethanol)

EU 038 TK002 (Ethanol)

EU 039 TK003 (Ethanol)

What to do	Why to do it
<b>A. EMISSION LIMITS</b>	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	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Volatile Organic Compounds: less than or equal to 17.13 lbs/hour	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
<b>B. POLLUTION CONTROL REQUIREMENTS</b>	hdr
Volatile Organic Compounds: greater than or equal to 50 percent collection efficiency	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Pressure Drop: greater than or equal to 7 inches of water column and less than or equal to 16 inches of water column , unless a new range is required to be set pursuant to Minn. R. 7017.2025, subp. 3. If a new range is required to be set, it will be based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Title I Condition: Limit taken to avoid classification as a major source under 40 CFR Section 52.21;Minn. R. 7007.0800, subp. 2 and 14; also meets CAM requirements per 40 CFR Section 64.3
Water flow rate: greater than or equal to 9 gallons/minute , unless a new limit is required to be set pursuant to Minn. R. 7017.2025, subp. 3. If a new limit is required to be set, it will be based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Title I Condition: Limit taken to avoid classification as a major source under 40 CFR Section 52.21;Minn. R. 7007.0800, subp. 2 and 14; also meets CAM requirements per 40 CFR Section 64.3
Each emission unit shall be controlled by the scrubber (CE 002) while in production operation ("on-line"). Equipment may only be "offline" while not in production operation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; also meets CAM requirements per 40 CFR Section 64.3
<b>D. TESTING REQUIREMENTS</b>	hdr
Performance Test: due 180 days after Permit Issuance to measure emissions of volatile organic compounds (results reported as total mass of VOC).	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Melrose Dairy Proteins LLC  
Permit Number: 14500003 - 005

<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test</p> <p>Performance Test Plan: due 30 days before each Performance Test</p> <p>Performance Test Pre-test Meeting: due 7 days before each Performance Test</p> <p>Performance Test Report: due 45 days after each Performance Test</p> <p>Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p>	<p>Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2</p>
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**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-8**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** SV 006 Emergency generator**Associated Items:** EU 033 Emergency Generator

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperature has been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input (Compliance with this condition is demonstrated inherently, given potential emissions of 0.0006 lbs/million BTU heat input)	Minn. R. 7011.2300, subp. 2
Fuel type: Natural gas only	Minn. R. 7005.0100, subp. 35a

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-9**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** EU 001 Boiler No. 1**Associated Items:** GP 004 Residual Oil Usage

SV 001 Boilers 1 and 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input (Compliance with this condition is demonstrated inherently, given potential emissions of 0.019 lbs/million Btu heat input)	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except as allowed in Minn. R. 7011.0510, subp. 2.	Minn. R. 7011.0510, subp. 2
Fuels Permitted: Natural gas or residual fuel oil only. (See GP 004 for additional limits on fuel oil usage.)	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-10**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** EU 002 Boiler No. 2**Associated Items:** GP 004 Residual Oil Usage

SV 001 Boilers 1 and 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input (Compliance with this condition is demonstrated inherently, given potential emissions of 0.019 lbs/million Btu heat input)	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except as allowed in Minn. R. 7011.0510, subp. 2.	Minn. R. 7011.0510, subp. 2
Fuels Permitted: Natural gas or residual fuel oil only. (See GP 004 for additional limits on fuel oil usage.)	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-11**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** EU 003 Boiler No. 3**Associated Items:** GP 004 Residual Oil Usage

SV 002 Boiler 3

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input (Compliance with this condition is demonstrated inherently, given potential emissions of 0.023 lbs/million Btu heat input)	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except as allowed by Minn. R. 7011.0515, subp. 2.	Minn. R. 7011.0515, subp. 2
Fuels Permitted: Natural gas or residual fuel oil only. (See GP 004 for additional limits on fuel oil usage.)	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Melrose Dairy Proteins LLC  
Permit Number: 14500003 - 005

Subject Item: EU 033 Emergency Generator

Associated Items: GP 005 Other Fuel Usage  
SV 006 Emergency generator

What to do	Why to do it
Fuel burned: Natural gas only.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2



**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-13**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** EU 036 Syble Process Dust Collector**Associated Items:** CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 008 Syble Process Dust Collector

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. Because EU036 is controlled by control equipment which has a collection efficiency of 99.7% by weight, EU036 is considered to be in compliance with this requirement. (PTE: 0.63 lbs/hour)	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
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. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter 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. R. 7007.0800, subp. 14

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-14**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item:** CE 001 Gas Scrubber (General, Not Classified)**Associated Items:** EU 004 Automatic Cheese Salter

What to do	Why to do it
Record the pressure drop and water flow rate of each scrubber once each day of operation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000
Corrective Action: if the pressure drop and/or water flow rate are not equal or greater than the minimum values specified in the Operation and Maintenance Plan, the Permittee shall take corrective action as soon as possible to achieve the required operating values. The Permittee shall keep a record of the type and date of all corrective actions taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2 and subp. 14
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2 and subp. 14
Calibrate the gauges annually, or as often as required by manufacturing specifications and maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 2 and subp. 14
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)

**TABLE A: LIMITS AND OTHER REQUIREMENTS****A-15**

11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

**Subject Item: CE 002 Packed-Gas Adsorption Column****Associated Items:** EU 005 Fermentor No. 1

EU 006 Fermentor No. 2

EU 007 Fermentor No. 3

EU 008 Fermentor No. 4

EU 009 Fermentor No. 5

EU 010 Fermentor No. 6

EU 011 Pre-Fermentor

EU 012 Pre-Fermentor

EU 013 Yeast Tank

EU 014 Beer Still Vent

EU 015 Stripper Flux Vent

EU 016 Mol. Sieve Vacuum Receiver Vent

EU 017 Fermentor No. 7

EU 018 Beer Well

EU 037 TK001 (Ethanol)

EU 038 TK002 (Ethanol)

EU 039 TK003 (Ethanol)

TK 001 Ethanol (SV004)

TK 002 Ethanol (SV004)

TK 003 Ethanol (SV004)

<b>What to do</b>	<b>Why to do it</b>
Record the pressure drop and water flow rate of each scrubber once each day of operation.	Title I Condition: To avoid classification as a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; also meets CAM requirements per 40 CFR Section 64.3
Corrective Action: if the pressure drop and/or water flow rate are not equal or greater than the minimum values specified in the Operation and Maintenance Plan, the Permittee shall take corrective action as soon as possible to achieve the required operating values. The Permittee shall keep a record of the type and date of all corrective actions taken.	Minn. R. 7007.0800, subp. 4, 5, and 14; also meets CAM requirements per 40 CFR Section 64.3
Inspect quarterly, or as required by manufacturing specifications, all components that are not subject to wear or plugging, including structural components, housing, ducts, and hoods. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2 and subp. 14
Inspect monthly, or as required by manufacturing specifications, all components that are subject to wear or plugging. Maintain a written record of the inspection and any action resulting from the inspection.	Minn. R. 7007.0800, subp. 2 and subp. 14
Calibrate the gauges annually, or as often as required by manufacturing specifications and maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 2 and subp. 14
Operation and Maintenance: The Permittee shall operate and maintain CE001 according to the control equipment manufacturers specifications and the facility operation and maintenance plan.	Minn. R. 7007.0800, subp. 2; also meets CAM requirements per 40 CFR Section 64.3

**TABLE B: SUBMITTALS****B-1** 11/08/06

Facility Name: Melrose Dairy Proteins LLC  
Permit Number: 14500003 - 005

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:

AQ Permit Technical Advisor  
Industrial 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:

AQ Compliance Tracking Coordinator  
Industrial 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****B-2** 11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Computer Dispersion Modeling Information	due 1,096 days after Permit Issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for pollutant). 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
Testing Frequency Plan	due 60 days after Initial Performance Test for volatile organic compounds. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on one-year (12 month), 36 month, and 60 month intervals, or as applicable, shall be required upon written approval of the MPCA.	SV004

**TABLE B: RECURRENT SUBMITTALS****B-3** 11/08/06

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003 - 005

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 07/28/1998 . 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, a report shall be submitted stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 07/28/1998 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX A: INSIGNIFICANT ACTIVITIES

Facility Name: Melrose Dairy Proteins LLC

Permit Number: 14500003-005

Fermentation Room Seed Tank (EU023)

Fermentation Room Pump Seals (EU024)

Maintenance Office Heating Unit (EU025)

Fuel Type: Natural Gas

Fuel Input: 135,000 btu/hr

HTST Control Room Space Heater (EU026)

Fuel Type: Natural Gas

Fuel Input: 100,000 btu/hr

Separator Room Heater (EU027)

Fuel Type: Natural Gas

Fuel Input: 175,000 btu/hr

Lab Heater (EU028)

Fuel Type: Natural Gas

Fuel Input: 231,000 btu/hr

Waste Treatment Heater (EU029)

Fuel Type: Natural Gas

Fuel Input: 75,000 btu/hr

Waste Treatment Heater (EU030)

Fuel Type: Natural Gas

Fuel Input: 350,000 btu/hr

Waste Treatment Furnace (EU031)

Fuel Type: Natural Gas

Fuel Input: 75,000 btu/hr

Emergency Generator (EU033)

Fuel Input: 1.1 MMbtu/hr

No. 5 Fuel Oil Tank (TK006)

No. 5 Fuel Oil Tank (TK007)

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 14500003-005**

This Technical Support Document (TSD) 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 determination to issue the permit.

**1. General Information**

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

Applicant/Address	Stationary Source/Address (SIC Code: 2022/2869)
P.O. Box 64101 St. Paul, MN 55164-0101	1000 Kraft Drive East Melrose Stearns County
Contact: Mr. Eric Tiegen Phone: (651) 481-2164	

**1.2. Description of the Permit Action**

Melrose Dairy Proteins LLC operates a cheese manufacturing plant and ethanol production facility in Melrose, Minnesota. The primary capability of the plant consists of the manufacture of natural cheeses, including parmesan, Romano, and cheddar. A portion of the by-products from the cheese-making process are fermented and distilled to produce denatured ethanol.

The portion of the facility that produces ethanol is subject to federal Prevention of Significant Deterioration (PSD) regulations when potential emissions reach 100 tons per year of any criteria pollutant. The capacity of the ethanol production facility is such that potential controlled emissions of all criteria pollutants produced by the production of ethanol are less than 100 tons per year. The facility as a whole (ethanol production plus cheese production) is subject to PSD when potential emissions reach 250 tons per year of any criteria pollutant. The permit contains conditions such that potential emissions of all criteria pollutants are less than 250 tons per year. Since the potential emissions of the facility as a whole exceed 100 tons per year, the facility is subject to Part 70 permitting requirements.



### **1.3 Description of any Changes Allowed with this Permit Issuance**

This permit action is for the reissuance of a Part 70 Total Facility Operating permit. It also includes a major amendment to change the Volatile Organic Compound (VOC) and control efficiency limits of their fermentation scrubber. An increase in the VOC limit is needed to reflect changes in the data analysis of testing results. Previously, the results were reported as ethanol since it was assumed that it made up the majority of the VOCs. This assumption was found to be incorrect and now VOC test results are required to be reported as the total mass of VOC. It should be noted that this permit action does not authorize any increase of ethanol production. The increase in VOC emissions is the sole result of how VOC testing data are analyzed and reported.

An insignificant modification was also incorporated in this reissuance. The Facility plans to install a pneumatically loaded powder hopper with a fabric filter to control emissions. The system will only be capable of operating for a cumulative 25 minutes per hour. The addition of this new unit and its emissions will not change the Facility's source status for Part 70 or PSD, described earlier.

The previous permit contained limits on natural gas usage for all three boilers. These requirements were removed because they served only to keep the Facility minor for NO<sub>x</sub>; however, the facility is already major for SO<sub>2</sub>. This permit action only changes the PTE and will not increase actual emissions. Other changes from the previous permit include updated language for several general requirements and some organization changes.

### **1.4 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit.**

<b>Permit Number and Issuance Date</b>	<b>Action Authorized</b>
14500003-004 October 19, 2005	Administrative Amendment: Test date extension
14500003-003 June 26, 2001	Administrative Amendment: Required modeling data to be submitted
14500003-002 November 30, 2000	Major Amendment: Lowered the control efficiency of CE002
14500003-001 July 28, 1998	Total Facility Permit

### **1.5. Facility Emissions:**

**Table 1. Total Facility Potential to Emit Summary**

Pollutant	PM	PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOCs	CO	Lead	Single HAP	Combined HAP
Total Facility Potential Emissions	132.6	113.3	1,648	395.9	190.4	104.1	0.01	14.01	16.3

Total Facility Limited Potential Emissions	35.9	30.8	217.8	152.8	85.8	104.1	0.00	7.0	9.2
Actual Emissions (2004)	10.3	7.1	33.6	63.4	34.8	20.9	0.00	HAPs not reported in emission inventory	

**Table 2. Facility Classification**

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		SO <sub>2</sub> , NO <sub>x</sub> , VOC	PM, PM <sub>10</sub> , CO, Pb
Part 70 Permit Program	SO <sub>2</sub> , NO <sub>x</sub> , CO	PM, PM <sub>10</sub> , VOC	Pb
Part 63 NESHAP		X	

## **2. Regulatory and/or Statutory Basis**

### New Source Review

The facility is not an existing major source under New Source Review regulations.

### Part 70 Permit Program

The facility is a major source under the Part 70 permit program.

### New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the operations at this facility.

### National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility has accepted limits on HAP usage such that it is a non-major source under 40 CFR pt. 63. Thus, no NESHAPs apply. However, if performance testing showed that HAP emissions exceeded major source threshold the facility would be subject to 40 CFR pt. 63, subp. DDDDD.

### Compliance Assurance Monitoring (CAM)

The potential emissions of VOC from SV004 are greater than 100 tons per year and a wet scrubber is used to meet a Title I condition thus making CAM applicable. The Facility will meet the requirements of CAM by monitoring and recording the pressure drop and water flow rate across the scrubber on a daily basis. No other units meet the applicability requirements for CAM.

### Minnesota State Rules

Portions of the facility are subject to the following Minnesota 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
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

**Table 3. Regulatory Overview of Facility**

EU, GP, or SV	Applicable Regulations	Comments:
FC	Title I limit to avoid major source classification under 40 CFR § 52.21	Limit set on ethanol production to keep the source minor for VOC.
GP004	Title I limit to avoid major source classification under 40 CFR § 52.21	Limits set on residual fuel oil usage and sulfur content to keep the source minor for SO <sub>2</sub>
SV003	Minn. R. 7011.0715	Standards of Performance for Post 1969 Industrial Process Equipment.
SV004	Minn. R. 7011.0715	Standards of Performance for Post 1969 Industrial Process Equipment.
	Title I limit to avoid major source classification under 40 CFR § 52.21	Limits taken emission rates and control efficiency to avoid major source classification for VOC
SV006	Minn. R. 7011.2300	Standards of Performance for Stationary Internal Combustion Engines
EU001/EU002	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment. Determination of applicable limit from rule: <ul style="list-style-type: none"> <li>• the units were constructed in 1967;</li> <li>• the facility is located outside the cities in Table I;</li> <li>• the unit capacity is less than 250 MMBtu/hr each</li> </ul>
EU003	Minn. R. 7007.0515	Standards of Performance for New Indirect Heating Equipment. Determination of applicable limit from rule: <ul style="list-style-type: none"> <li>• the units were constructed in 1980;</li> <li>• the facility is located outside the cities in Table I;</li> <li>• the unit capacity is less than 250 MMBtu/hr each</li> </ul>

The language 'This is a state-only requirement and is not enforceable by the EPA Administrator and citizens under the Clean Air Act' refers to permit requirements that are mandated by state law rather than by the federal Clean Air Act. The language is to clarify the distinction between permit conditions that are required by federal law and those that are required by state law. State law requirements are not enforceable by EPA or by citizens under the federal Clean Air Act, but are fully enforceable by the MPCA and citizens under provisions of state law.

### **3. Technical Information**

#### **3.1 Calculations of Potential to Emit**

Attachment 1 contains detailed spreadsheets and supporting information prepared by the MPCA and the Permittee.

### 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**

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
FC	Ethanol Production Limit: ≤ 3,000,000 gal/year, 12 month rolling sum  (Title I: To Avoid Classification as a Major Source under 40 CFR § 52.21)	Recordkeeping: Record the amount of ethanol produced each month.	The facility does not have the necessary raw product, lactose, to produce more ethanol making it unlikely that they will exceed this limit.
GP004 (EU001, EU002 & EU003)	Fuel Usage: ≤ 1,845,000 gal/year of residual fuel oil, 12 month rolling sum  Sulfur Content: ≤ 1.5%  (Title I: To Avoid Classification as a Major Source under 40 CFR § 52.21)	Recordkeeping: Record the amount of residual fuel oil used each month and retain residual oil vendor certifications of sulfur content.	These limits apply collectively to all three boilers: EU001, EU002, and EU003. They serve to keep the facility a PSD synthetic minor for SO <sub>2</sub> .
SV003	PM: ≤ 0.3 gr/dscf	Recordkeeping: Record	The facility is required to

<b>Emission Unit or Group</b>	<b>Requirement (basis)</b>	<b>Additional Monitoring</b>	<b>Discussion</b>
	Opacity: ≤ 20%  (Minn. R. 7011.0715)	the pressure drop and water flow rate daily.	maintain the pressure drop and water flow rate in accordance with their O&M plan.
SV004	VOC: ≤ 17.13 lb/hr  (Title I: To Avoid Classification as a Major Source under 40 CFR § 52.21)	Recordkeeping: Record the pressure drop and water flow rate daily.	The Facility will also perform periodic performance tests. Pressure drop and water flow rate will be set based on past operating history and the results of these tests.
	PM: ≤ 0.3 gr/dscf  Opacity: ≤ 20%  (Minn. R. 7011.0715)	Recordkeeping: Record the pressure drop and water flow rate daily.	This unit vents emissions from fermentation tanks and related processes. If operated properly it is not expected to have significant emissions of PM or opacity so testing was not required.

### **3.3 Insignificant Activities**

Melrose Dairy Proteins has several operations which are classified as insignificant activities. These are listed in Appendix A to the permit.

The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities. See Attachment 1 of this TSD for PTE information for the insignificant activities.

**Table 5. Insignificant Activities**

<b>Insignificant Activity</b>	<b>General Applicable Emission limit</b>	<b>Discussion</b>
Fuel use: space heaters fueled by, kerosene, natural gas, or propane	PM $\leq$ 0.6 or 0.4 lb/MMBtu, depending on year constructed Opacity $\leq$ 20% with exceptions (Minn. R. 7011.0510/515)	For this unit, based on the fuels used and EPA published emissions factors, it is highly unlikely that it could violate the applicable requirement. In addition, these types of units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Fuel burning equipment with a capacity less than 500,000 Btu/hour, etc.	PM $\leq$ 0.6 or 0.4, depending on year constructed Opacity $\leq$ 20% with exceptions (Minn. R. 7011.0510/515)	For these units, based on the fuels used and EPA published emissions factors, it is highly unlikely that they could violate the applicable requirements.
Brazing, soldering or welding equipment	PM, variable depending on airflow Opacity $\leq$ 20% (Minn. R. 7011.0710/715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	Opacity $\leq$ 20% (Minn. R. 7011.0105 or 7011.0110))	While no known emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into an office area, so monitoring or testing is not feasible.
Fugitive Emissions from unpaved roads and parking lots	Requirement to take reasonable measures to prevent PM from becoming airborne (Minn. R. 7011.0150)	The Facility is located outside the Metro area and has paved parking lots and private roads. Nearly all surfaces are currently paved. The draft/proposed permit does contain a general requirement that this standard must be met.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source	PM, variable depending on airflow or process weight rate Opacity $\leq$ 20% (Minn. R. 7011.0715)	While spray equipment will have the potential to emit particulate matter, these particular activities are those not associated with production, so they would be infrequent and usually occur outdoors. Testing or monitoring is not feasible.

Insignificant Activity	General Applicable Emission limit	Discussion
<p>Equipment venting PM/PM<sub>10</sub> 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>	<p>PM, variable depending on airflow Opacity ≤ 20% (Minn. R. 7011.0715)</p>	<p>For these units, it is highly unlikely that they could violate the applicable requirement. In addition, these units are vented inside a building, so testing for PM or opacity is not feasible.</p>

### 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

Public Notice Period: <start date> - <end date>

EPA 45-day Review Period: <start date> - <end date>

Comments were <not> received from the public during the public notice period. <The comments received did <not> include adverse comments on any applicable requirements of the permit. Changes to the permit were <not> made as a result of the comments. *Provide summary of changes.* >

<The revised permit was sent to EPA for their 45-day review on <date>.> Comments were <not> received from EPA during their review period. Changes to the permit were <not> made as a result of the comments. *Provide summary of changes.* >

#### 4. Conclusion

Based on the information provided by <>, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 14500003-005, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:      Michael Westereng (permit writer/engineer)  
   Dave Crowell (enforcement)  
   Andrew Place (stack testing)  
   Paula Connell (peer reviewer)

Attachments: 1. Calculation Spreadsheets