

**AIR EMISSION PERMIT NO. 13700063- 001**  
**IS ISSUED TO**

**NATIONAL STEEL PELLET COMPANY**  
Mine Road  
Keewatin, Itasca County, Minnesota 55753

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

Permit Type	Application Date
Total Facility Operating Permit	1/17/95
Revised Total Facility Operating Permit	2/22/96

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 and with all general conditions listed in Minn. R. 7007.0800, subp. 16, and [all standard permit requirements listed in 40 CFR § 70.6\(a\)](#) which are incorporated by reference. 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 defined in the state air pollution control rules unless the term is explicitly defined in the permit.

This permit replaces and supersedes all previous air emission construction and operating permits and contains all existing Title I conditions.

**Permit Type:** Federal ; Part 70

**Issue Date:** August 8, 1997

**Expiration:**  
All Title I Conditions do not expire.

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Michael J. Sandusky  
Acting Division Manager  
Air Quality Division

for Peder A. Larson  
Commissioner  
Minnesota Pollution Control Agency

PFO:lao

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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	(612)296-6300
Outside Metro Area	1-800-657-3864
TTY	(612)282-5332

The rule 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. Any applicable requirements which have been determined not to apply are identified as not applying in Table A of this permit.

The permit shield, however does not apply to: Minn. R. ch. 7030 (Noise Pollution Control), and Minn. R. ch. 7009 (National Ambient Air Quality Standards and Minnesota Ambient Air Quality Standards).

**EMERGENCY DEFENSE:**

An emergency defense for noncompliance is available under Minn. R. 7007.1850

**FACILITY DESCRIPTION:**

The Permittee operates a taconite (iron ore) mine and processing plant in Keewatin, Minnesota. The facility produces taconite pellets for use as a primary raw ingredient at iron and steel mills. Major activity areas at the facility include: mines and crushers, concentrating, pelletizing, pellet storage and loadout, additive receiving and handling, concentrate storage, loadout and receiving, and support activities.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 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**

<b>What to do</b>	<b>Why to do it</b>
Air Pollution Control Equipment: Operate all air 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)
Comply with the O & M Plan: Follow the actions and recordkeeping specified in the O & M plan. The plan may be amended with Commissioners written approval.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. 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. 1
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants. 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
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 180 days of permit issuance, if monitoring equipment is not installed on the date the permit is issued for CE001 - CE018, CE020, CE022, CE024, CE030 - CE032, and CE034 - CE036.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Debugging, Troubleshooting, and Establishment of Parameter Ranges: Complete within 180 days of installation or of completion of needed repairs of all monitoring equipment, including the air pollution control equipment operating at the time of permit issuance CE001 - CE018, CE020, CE022, CE024, CE030 - 032 and CE034 - CE036, and the idled phase 1 air pollution control equipment that may resume operation in the future, CE019, CE021, CE023, CE027 - CE029 and CE033.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 30 days of resuming operation of any idled phase 1 emission units and associated air pollution control equipment. The idled phase 1 air pollution control equipment are CE019, CE021, CE023, CE027 - CE029 and CE033.	Minn. R. 7007.0800, subp. 4(D)
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 Table 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, such as for system breakdowns, repairs, calibration checks, and zero and span adjustments (as applicable). Monitoring records should reflect any such periods of process shutdown.	Minn. R. 7007.0800, subp. 4(D)
Visible Emissions Check: Prior to approval of the O & M Plan, the Permittee shall check visible emissions from SV001-032, 034, 037, and 038 once daily when in operation during daylight hours. A form(s) meeting the requirements of Appendix I shall be used to indicate whether process or control equipment requires attention. In the event the Permittee makes a finding that attention is required, the Permittee shall investigate the process and control equipment performance and implement appropriate corrective action, if necessary.  Upon approval of the O & M Plan, the Permittee shall check visible emissions from SV001-032, 034, 037, and 038 once daily when in operation during daylight hours. The Permittee shall use the visible emissions checklists in the O & M Plan as a means to indicate when appropriate corrective actions in the O & M Plan should be taken.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Visible Emissions Checklist(s): The permittee shall use one or more checklists that contain SV001-032, 034, 037, 038. These checklist(s) will be a part of the O&M plan. The checklist or checklists must contain at a minimum the information contained in Appendix I.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

For SV003, 029-031 the visible emissions checklist(s) will require a daily check of gas stream pressure drop if the plume is limited by visible moisture. For SV001, 002, 004, 019-022 the visible emissions checklist(s) will require a daily check of gas stream pressure drop and total water pressure if the plume is limited by visible moisture.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Fugitive Dust Observations: Prior to the approval of the fugitive control plan, the Permittee shall observe fugitive dust sources FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039 once daily during daylight hours. A form(s) meeting the requirements of Appendix I shall be used to check fugitive dust control practices. In the event the Permittee makes a finding that attention to fugitive dust sources is required, the Permittee shall investigate the fugitive dust sources and implement corrective action, if necessary.  Upon approval of the fugitive control plan, the Permittee shall observe fugitive dust sources FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039 once daily during daylight hours. The Permittee shall use the fugitive sources visible emissions checklist(s) in the fugitive dust control plan as a means to indicate when appropriate corrective actions in the fugitive control plan are taken..	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Fugitive Sources Visible Emissions Checklist(s): The permittee shall use one or more checklists that contain FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039. These checklist(s) will be a part of the Fugitive Control Plan. The checklist or checklists must contain at a minimum the information contained in Appendix I.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Visible Emissions Training: The Permittee shall (1) ensure that one plant employee obtain an initial EPA Method 9 certification and be recertified every three years or (2) employ a similarly certified contractor. This person will train other plant employees to perform the daily visible emissions check as detailed in the O & M Plan and Fugitive Control Plan.	Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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
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 Tests: Performance testing for EU005-018, 020, 022, 024, 030-032, and 037-038 and their associated control equipment and stacks shall be tested at a green ball feed rate of greater than or equal to 810 long tons per hour. The performance testing for EU001-004 and their associated control equipment and stacks shall be tested at greater than or equal to 90% of the emission units rated capacity. If a performance test is conducted at less than the applicable minimum rate given above the Permittee shall be given the opportunity to retest within 90 days of the subject test before process limits can be applied as specified in Minn. R. 7017.2025, subpart 3. Once a process limit has been applied the Permittee may at any time conduct a voluntary performance test at or above the applicable minimum rate in order to remove the process limit.	Minn. R. 7017.2025
Performance tests meeting the requirements of Minn. R. 7017.2001 through 7017.2060 conducted after May 13, 1997, but before permit issuance may be used to meet the requirements of an initial performance test required by Table A of this permit.	Minn. R. 7017.2025
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
The Discovery of Deviations Endangering Human Health or the Environment Report (written): are due two (2) working days after discovery of deviation, submit a written description of any deviation endangering human health or the environment to the Commissioner. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Application for Permit Amendment: If you need a permit amendment, submit 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
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

Fugitive Control Plan: Comply with the fugitive control plan. Follow the actions and recordkeeping specified in the fugitive control plan. The plan may be amended with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, or fugitive control plan, then the Permittee may be required to amend the fugitive control plan.	Minn. R. 7011.0150
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
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)
Recordkeeping: 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 strip-chart 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)
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)
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 federally enforceable.	Minn. R. 7030.0010 - 7030.0080
Material Usage: less than or equal to 1.5 percent by weight of the pellet weight shall be the limit for fluxstone (limestone, dolomite, or similar additives) usage in pellet production on a calendar month average.	Minn. R. 7007.0800, subp. 2
Maintain monthly fluxstone purchase and pellet production records: calculate the percentage of fluxstone usage and maintain these records on site within fifteen (15) days after the end of the month; include these records and the 1.5% fluxstone usage limit when reporting deviation.	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
Contractors: The Permittee shall retain records on site of all contractors that are allowed on site that include any crushers, screens and conveyors. The Permittee shall also retain records on site of all contractors whose operations would require an Air Emissions Permit from the MPCA. The records shall include the contractors company name, MPCA air emissions permit number, short description of activities undertaken by the contractor, estimate of emissions or materials handled and the dates the contractor was on site. The record shall be updated at least monthly.	Minn. R. 7007.0800, subp. 2
Prior to resumption of operation of idled phase 1 equipment, the Permittee shall complete initial modeling of the following idled phase 1 emission units: EU019, 021, 023, 025, 027, 028, and 029. The modeling shall include all phase 1 emission units, phase 2 emission units, and fugitive sources.  The initial modeling shall be performed according to the modeling protocol that was approved on March 13, 1997, by the MPCA and revised to include the idled phase 1 emission units. Any changes to the protocol that were approved by the MPCA and/or U.S. EPA in writing after March 13, 1997, shall also be incorporated into the revised protocol.	Minn. R. 7007.0800, subp. 2 and Minn. R. ch. 7009 and 40 CFR pt. 50

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 001 Six crude ore feed lines, conveyor transfer

**Associated Items:** CE 005 Wet Scrubber-High Efficiency w/o Lime  
CE 006 Wet Scrubber-High Efficiency w/o Lime  
CE 007 Wet Scrubber-High Efficiency w/o Lime  
CE 008 Wet Scrubber-High Efficiency w/o Lime  
CE 009 Wet Scrubber-High Efficiency w/o Lime  
CE 010 Wet Scrubber-High Efficiency w/o Lime  
EU 005 Conveyor Transfer-Crude Ore Feed  
EU 006 Conveyor Transfer-Crude Ore Feed  
EU 007 Conveyor Transfer-Crude Ore Feed  
EU 008 Conveyor Transfer-Crude Ore Feed  
EU 009 Conveyor Transfer-Crude Ore Feed  
EU 010 Conveyor Transfer-Crude Ore Feed  
SV 005  
SV 006  
SV 007  
SV 008  
SV 009  
SV 010

What to do	Why to do it
Initial Performance Test: due 180 days after Permit Issuance on one (1) representative unit to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 002 Four crude ore feed lines, conveyor trans.

**Associated Items:** CE 011 Wet Scrubber-High Efficiency w/o Lime  
CE 012 Wet Scrubber-High Efficiency w/o Lime  
CE 013 Wet Scrubber-High Efficiency w/o Lime  
CE 014 Wet Scrubber-High Efficiency w/o Lime  
EU 011 Conveyor Transfer-Crude Ore Feed  
EU 012 Conveyor Transfer-Crude Ore Feed  
EU 013 Conveyor Transfer-Crude Ore Feed  
EU 014 Conveyor Transfer-Crude Ore Feed  
SV 011  
SV 012  
SV 013  
SV 014

What to do	Why to do it
Initial Performance Test: due 1,095 days after Permit Issuance on one (1) representative unit to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 003 Phase 1 & 2 grate feed**Associated Items:** CE 019 Wet Scrubber-High Efficiency w/o Lime

CE 020 Wet Scrubber-High Efficiency w/o Lime

EU 019 Grate Feed, Phase I

EU 020 Grate Feed, Phase II

SV 019

SV 020

What to do	Why to do it
Initial Performance Test: due 1,095 days after Permit Issuance on one (1) representative unit to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Resumption Performance Test: due 180 days after the resumption of operation of EU019 to measure emissions of PM and Opacity emissions. This test is in addition to the other testing required for GP 003.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 004 Phase 1 & 2 grate discharge**Associated Items:** CE 021 Wet Scrubber-High Efficiency w/o Lime

CE 022 Wet Scrubber-High Efficiency w/o Lime

EU 021 Grate Discharge, Phase I

EU 022 Grate Discharge, Phase II

SV 021

SV 022

What to do	Why to do it
Initial Performance Test: due 180 days after Permit Issuance on one (1) representative unit to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Resumption Performance Test: due 180 days after the resumption of operation of EU021 to measure PM and Opacity emissions. This test is in addition to the other testing required for GP 004.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 005 2 pellet screening system emission pts**Associated Items:** CE 037 Wet Scrubber-High Efficiency w/o Lime

CE 038 Wet Scrubber-High Efficiency w/o Lime

EU 037 Pellet Screening System

EU 038 Conveyor Drop

SV 037

SV 038

What to do	Why to do it
Initial Performance Test: due 1,095 days after Permit Issuance on one (1) representative unit to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 60 months between dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** GP 006 Phase 1 & 2 Additive Blending**Associated Items:** CE 015 Wet Scrubber-High Efficiency w/o Lime

CE 016 Wet Scrubber-High Efficiency w/o Lime

EU 015 Additive Blending, Phase I

EU 016 Additive Blending, Phase II

SV 015

SV 016

What to do	Why to do it
Initial Performance Test: due 1,460 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 001**Associated Items:** EU 001 Gyratory Crusher-Primary Crusher No.1

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 1,460 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 002**Associated Items:** EU 002 Gyratory Crusher-Primary Crusher No.2

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 730 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 003**Associated Items:** EU 003 Conveyor Transfer-Drive House No. 1 Primary Conveyor

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 1,460 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 004**Associated Items:** EU 004 Conveyor Transfer-Drive House No. 2 Primary Conveyor

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 1,460 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 005**Associated Items:** EU 005 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 006**Associated Items:** EU 006 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 007**Associated Items:** EU 007 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 008**Associated Items:** EU 008 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 009**Associated Items:** EU 009 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 010**Associated Items:** EU 010 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 011**Associated Items:** EU 011 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 012**Associated Items:** EU 012 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 013**Associated Items:** EU 013 Conveyor Transfer-Crude Ore Feed  
GP 002 Four crude ore feed lines, conveyor trans.

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 014**Associated Items:** EU 014 Conveyor Transfer-Crude Ore Feed  
GP 002 Four crude ore feed lines, conveyor trans.

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 015**Associated Items:** EU 015 Additive Blending, Phase I

GP 006 Phase 1 &amp; 2 Additive Blending

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 016**Associated Items:** EU 016 Additive Blending, Phase II

GP 006 Phase 1 &amp; 2 Additive Blending

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 017**Associated Items:** EU 017 Additive Silo, Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 018**Associated Items:** EU 018 Additive Silo, Phase II

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 019**Associated Items:** EU 019 Grate Feed, Phase I  
GP 003 Phase 1 & 2 grate feed

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: Upon resuming operation of EU019 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 020**Associated Items:** EU 020 Grate Feed, Phase II

GP 003 Phase 1 &amp; 2 grate feed

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 021**Associated Items:** EU 021 Grate Discharge, Phase I  
GP 004 Phase 1 & 2 grate discharge

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: Upon resuming operation of EU021 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 022**Associated Items:** EU 022 Grate Discharge, Phase II

GP 004 Phase 1 &amp; 2 grate discharge

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 023**Associated Items:** EU 023 Cooler Dump Zone, Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: Upon resuming operation of EU023 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 180 days after Resuming Operation of EU023 to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 024**Associated Items:** EU 024 Cooler Vibrating Feeder - Phase II

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 730 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 60 months following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 025**Associated Items:** EU 025 Pellet Cooler - Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Initial Performance Test: due 180 days after Resuming Operation of EU025 to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Process monitoring: Upon resuming operation of EU025 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 026**Associated Items:** EU 026 Pellet Cooler - Phase II

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Initial Performance Test: due 180 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each year following Initial Performance Test to measure PM and Opacity emissions. The tests shall be conducted at an interval not to exceed 12 months between test dates.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each year following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4
Performance testing frequency for Total Particulate Matter and Opacity can be changed to once every three years after three consecutive annual tests have demonstrated compliance with the emission limits.	Minn. R. 7017.2020, subp. 1
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 027**Associated Items:** EU 027 Cooler Vibrating Feeder - Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: Upon resuming operation of EU027 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 180 days after Resuming Operation of EU027 to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 028**Associated Items:** EU 028 Pellet Product Conveyor - Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Initial Performance Test: due 180 days after Resuming Operation of EU028 to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Process monitoring: Upon resuming operation of EU028 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 029**Associated Items:** EU 029 Grate Kiln - Indurator Waste Gas, Phase I

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: Upon resuming operation of EU029 the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 180 days after Resuming Operation of EU029 to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** SV 030

**Associated Items:** EU 030 Grate Kiln - Indurator Waste Gas, Phase II

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: SV 031

Associated Items: EU 030 Grate Kiln - Indurator Waste Gas, Phase II

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 032**Associated Items:** EU 032 Pellet Cooler Product Belts

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Initial Performance Test: due 730 days after Permit Issuance to measure PM and Opacity emissions.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 034**Associated Items:** EU 034 Pellet Loadout Drive House

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.	Minn. R. 7011.0710, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0710, subp. 3
Opacity: less than or equal to 20 percent opacity , except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	Minn. R. 7011.0710, subp. 1(B)
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 037**Associated Items:** EU 037 Pellet Screening System

GP 005 2 pellet screening system emission pts

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.05 grams/dry standard cubic meter	40 CFR Section 60.385(b); Minn. R. 7011.2700
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** SV 038**Associated Items:** EU 038 Conveyor Drop

GP 005 2 pellet screening system emission pts

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.05 grams/dry standard cubic meter	40 CFR Section 60.385(b); Minn. R. 7011.2700
Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** EU 030 Grate Kiln - Indurator Waste Gas, Phase II

**Associated Items:** CE 030 Centrifugal Collector - High Efficiency  
 CE 031 Centrifugal Collector - High Efficiency  
 CE 035 Centrifugal Collector - Medium Efficiency  
 CE 036 Centrifugal Collector - Medium Efficiency  
 SV 030  
 SV 031

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.	Minn. R. 7011.0715, subp. 1(A)
Total Particulate Matter: greater than or equal to 85 percent collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	Minn. R. 7011.0715, subp. 3
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Initial Performance Test: due 365 days after Permit Issuance to measure PM and Opacity emissions. SV030 and SV031 shall be tested simultaneously.	Minn. R. 7017.2020, subp. 1
Performance Test: due before end of each 36 months following Initial Performance Test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 36 months between test dates. SV030 and SV031 shall be tested simultaneously.	Minn. R. 7017.2020, subp. 1
Initial Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4
Performance Test Pre-test Meeting: due 7 days before end of each 36 months following Initial Performance Test (7 days before recurring performance test)	Minn. R. 7017.2030, subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 001 Centrifugal Collector - Medium Efficiency**Associated Items:** EU 001 Gyratory Crusher-Primary Crusher No.1

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 002 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 002 Gyratory Crusher-Primary Crusher No.2

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 003 Centrifugal Collector - Medium Efficiency**Associated Items:** EU 003 Conveyor Transfer-Drive House No. 1 Primary Conveyor

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 004 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 004 Conveyor Transfer-Drive House No. 2 Primary Conveyor

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 005 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 005 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 006 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 006 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 007 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 007 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 008 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 008 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 009 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 009 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 010 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 010 Conveyor Transfer-Crude Ore Feed

GP 001 Six crude ore feed lines, conveyor transfer

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 011 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 011 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 012 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 012 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 013 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 013 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 014 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 014 Conveyor Transfer-Crude Ore Feed

GP 002 Four crude ore feed lines, conveyor trans.

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 015 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 015 Additive Blending, Phase I

GP 006 Phase 1 &amp; 2 Additive Blending

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 016 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 016 Additive Blending, Phase II

GP 006 Phase 1 &amp; 2 Additive Blending

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 017 Additive Silo, Phase I

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 018 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 018 Additive Silo, Phase II

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 019 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 019 Grate Feed, Phase I

GP 003 Phase 1 &amp; 2 grate feed

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 020 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 020 Grate Feed, Phase II

GP 003 Phase 1 &amp; 2 grate feed

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 021 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 021 Grate Discharge, Phase I

GP 004 Phase 1 &amp; 2 grate discharge

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 022 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 022 Grate Discharge, Phase II

GP 004 Phase 1 &amp; 2 grate discharge

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 023 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 023 Cooler Dump Zone, Phase I

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 024 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 024 Cooler Vibrating Feeder - Phase II

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 027 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 027 Cooler Vibrating Feeder - Phase I

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 028 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 028 Pellet Product Conveyor - Phase I

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 029 Centrifugal Collector - High Efficiency**Associated Items:** EU 029 Grate Kiln - Indurator Waste Gas, Phase I

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every 24 hours when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 030 Centrifugal Collector - High Efficiency**Associated Items:** EU 030 Grate Kiln - Indurator Waste Gas, Phase II

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every 24 hours when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: CE 031 Centrifugal Collector - High Efficiency  
Associated Items: EU 030 Grate Kiln - Indurator Waste Gas, Phase II

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every 24 hours when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 032 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 032 Pellet Cooler Product Belts

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 034 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 034 Pellet Loadout Drive House

What to do	Why to do it
Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Total water pressure: Monitor and record once every seven (7) days when in operation once the water total pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 037 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 037 Pellet Screening System

GP 005 2 pellet screening system emission pts

What to do	Why to do it
Gas Stream Pressure Drop: Monitor and record once every seven (7) days when in operation.	40 CFR Section 60.385(b); Minn. R. 7011.2700
Liquid Flow Rate: Monitor and record once every seven (7) days when in operation.	40 CFR Section 60.385(b); Minn. R. 7011.2700

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item:** CE 038 Wet Scrubber-High Efficiency w/o Lime**Associated Items:** EU 038 Conveyor Drop

GP 005 2 pellet screening system emission pts

What to do	Why to do it
Gas Stream Pressure Drop: Monitor and record once every seven (7) days when in operation.	40 CFR Section 60.385(b); Minn. R. 7011.2700
Liquid Flow Rate: Monitor and record once every seven (7) days when in operation.	40 CFR Section 60.385(b); Minn. R. 7011.2700

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name:       National Steel Pellet Co  
Permit Number:     13700063 - 001

**Subject Item:**       **FS 003   PM10 - Crude Ore Truck Loading**

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 004 PM10 - Crude Ore Truck Unload (No. 1)

Associated Items: CE 102 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 005 PM10 - Crude Ore Truck Unload (No. 2)

**Associated Items:** CE 102 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 007 PM10 - Crude Ore Hauling

**Associated Items:** CE 103 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 009 PM10 - Crushed Crude Ore Hauling

**Associated Items:** CE 103 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 011 PM10 - Crushed Crude Ore Loading

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 014 PM10 - Waste Materials Truck Loading

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 015 PM10 - Waste Materials Hauling

**Associated Items:** CE 103 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name:       National Steel Pellet Co  
Permit Number:     13700063 - 001

**Subject Item:           FS 016   PM10 - Waste Materials Truck Unloading**

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 019 PM10 - Tailings Basin

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

**Subject Item: FS 025 PM10 - Emergency Conveyor Loadout - Phase II**

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 028 PM10 - Pellet Drop Loadout Bin to Railcar

**Associated Items:** CE 104 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 031 PM10 - Portable Conveyors and Bar Screen

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 032 PM10 - Portable Pellet Reclaim & Screen

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)



TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 033 PM10 - Pellet Drop Onto Pile

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 035 PM10 - Conveyor Transfer - Crude Ore Storage

**Associated Items:** CE 105 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 036 PM10 - Conveyor Transfer - Fines Conveyor

**Associated Items:** CE 106 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 037 PM10 - Pellet Conveyor Transfer - 12/43

Associated Items: CE 106 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

**Subject Item:** FS 038 PM10 - Pellet Conveyor Transfer - 43/27

**Associated Items:** CE 107 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Subject Item: FS 039 PM10 - Pellet Drop Loadout Conveyor to Loadout Bin

Associated Items: CE 104 Other  
CE 108 Other

What to do	Why to do it
Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)

## TABLE B: SUBMITTALS

08/08/97

Facility Name: National Steel Pellet Co  
Permit Number: 13700063 - 001

Table B lists the submittals you must send to the Commissioner. Table B is divided into two sections, for source-specific submittal requirements and for submittals required of all permittees. Source-specific submittals are further organized as either one-time only or recurrent requirements. You may also be subject to additional reporting requirements contained in the compliance schedule located in Table C of this permit. All submittals must be postmarked or received by the date specified in the table, and certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Submittals which must be provided on standardized forms approved by the Commissioner are noted in Tables B and C.

Send any application for a permit or permit amendment to: Permit Information Coordinator, Permit Section, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4914. Also send the Permit Information Coordinator notices of: accumulated insignificant activities, installation of control equipment, replacement of an emissions unit, and changes that contravene a permit term.

Send all other submittals to: Compliance Tracking Coordinator, Compliance Determination Unit, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

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

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 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
Fugitive Control Plan	due 90 days after Permit Issuance for review and approval by the Commissioner. The plan shall identify all fugitive emission sources, primary and contingent control measures and practices, and records kept. The plan will include a statement of objectives, fugitive emission sources, operating and control measures, dust suppressant application description, corrective actions, training, and records. The Commissioner may require additions or changes to the Fugitive Emission Control Plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.	Total Facility
Initial Performance Test Notification (written)	due 30 days before Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
Initial Performance Test Plan	due 30 days before Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
Initial Performance Test Report - Microfiche Copy	due 105 days after Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
Initial Performance Test Report	due 45 days after Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
Notification of the Actual Date of Initial Startup	due 15 days after Resuming Operation of idled phase 1 emission units EU019, EU021, EU023, EU025, EU027, EU028, and EU029.	Total Facility
Refined modeling of fugitive sources and all non-idled emission units shall be conducted if the Initial Dispersion Modeling results do not demonstrate attainment with the NAAQS and MAAQS. If needed, these Computer Dispersion Modeling Results	due before 01/01/98	Total Facility
Refined modeling results for all non idled emission units and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling. If required, the Compliance Plan	due 30 days after Computer Dispersion Modeling Results	Total Facility
Testing Frequency Plan	due 90 days after Initial Performance Test required by this permit. Could be 1, 3, or 5 year intervals depending on the margin of compliance during the initial performance test required by this permit.	GP001, GP002, GP003, GP004, SV002, SV004, SV023, SV025, SV027, SV028, SV029, SV032



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

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

<p>The Permittee shall provide an O &amp; M plan for review and approval by the Commissioner. The O &amp; M plan shall identify all air pollution control equipment, a preventative maintenance program for that equipment, description of corrective actions to be taken in the event of a malfunction or breakdown, description of the employee training program, and the records kept to demonstrate plan implementation. The Commissioner may require additions or changes to the O &amp; M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan. The Operation and Maintenance Plan</p>	<p>due 120 days after Permit Issuance</p>	<p>Total Facility</p>
<p>The Permittee shall revise the O &amp; M plan to include the normal operating ranges for all pollution control equipment monitoring devices for CE001 - CE018, CE020, CE022, CE024, CE030 - CE032, and CE034 - CE036. The Commissioner may require additions or changes to the O &amp; M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan. The revisions to the Operation and Maintenance Plan</p>	<p>due 365 days after Permit Issuance</p>	<p>Total Facility</p>
<p>The Permittee shall revise the O &amp; M plan to include the phase 1 emission units and associated air pollution control equipment after resuming operation of any phase 1 equipment. The idled phase 1 associated air pollution control equipment is CE019, CE021, CE023, CE027 - CE029 and CE033. Revision of the O &amp; M plan shall include the normal operating ranges for all pollution control equipment monitoring devices. The revisions to the Operation and Maintenance Plan</p>	<p>due 210 days after Resuming Operation</p>	<p>Total Facility</p>
<p>Total facility initial modeling of all phase 1 emission units, phase 2 emission units, and fugitive sources. The permittee shall submit a revised modeling protocol based on the modeling protocol that was approved on March 13, 1997, by the MPCA and revised to include the idled phase 1 emission units. Any changes to the protocol that were approved by the MPCA and/or U.S. EPA in writing after March 13, 1997, shall also be incorporated into the revised Computer Dispersion Modeling Protocol</p>	<p>due 90 days before Resuming Operation</p>	<p>Total Facility</p>
<p>Total facility initial modeling results of all phase 1 emission units, phase 2 emission units, and fugitive sources shall be submitted prior to resuming operation of idled phase 1 emission units. The Total Facility Computer Dispersion Modeling Results</p>	<p>due 60 days before Resuming Operation</p>	<p>Total Facility</p>
<p>Total facility modeling results of all phase 1 emission units, phase 2 emission units, and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling. If required, the Compliance Plan</p>	<p>due 30 days before Resuming Operation</p>	<p>Total Facility</p>

**TABLE B: RECURRENT SUBMITTALS**

08/08/97

Facility Name: National Steel Pellet Co

Permit Number: 13700063 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance . The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 30 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. The report covers all deviations experienced during the calendar year.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Total Facility
Performance Test Notification (written)	due 30 days before end of each year following Initial Performance Test (30 days before each recurring performance test).	SV026
Performance Test Plan	due 30 days before end of each year following Initial Performance Test (30 days before each recurring performance test)	SV026
Performance Test Report - Microfiche Copy	due 105 days after end of each year following Initial Performance Test (105 days after each recurring performance test)	SV026
Performance Test Report	due 45 days after end of each year following Initial Performance Test (45 days after each recurring performance test)	SV026
Performance Test Notification (written)	due 30 days before end of each 36 months following Initial Performance Test (30 days before each recurring performance test).	EU030
Performance Test Plan	due 30 days before end of each 36 months following Initial Performance Test (30 days before recurring performance test)	EU030
Performance Test Report - Microfiche Copy	due 105 days after end of each 36 months following Initial Performance Test (105 days after each recurring performance test)	EU030
Performance Test Report	due 45 days after end of each 36 months following Initial Performance Test (45 days after each recurring performance test)	EU030
Performance Test Notification (written)	due 30 days before end of each 60 months following Initial Performance Test (30 days before each recurring performance test).	GP005, GP006, SV001, SV003, SV024
Performance Test Plan	due 30 days before end of each 60 months following Initial Performance Test (30 days before each recurring performance test)	GP005, GP006, SV001, SV003, SV024
Performance Test Report - Microfiche Copy	due 105 days after end of each 60 months following Initial Performance Test (105 days after each recurring performance test)	GP005, GP006, SV001, SV003, SV024
Performance Test Report	due 45 days after end of each 60 months following Initial Performance Test (45 days after each recurring performance test)	GP005, GP006
Performance Test Report	due 45 days after end of each 60 months following Initial Performance Test (45 days after each recurring performance test)	SV001
Performance Test Report	due 45 days after end of each 60 months following Initial Performance Test (45 days after each recurring performance test)	SV003
Performance Test Report	due 45 days after end of each 60 months following Initial Performance Test (45 days after each recurring performance test)	SV024

## **APPENDIX MATERIAL**

**Facility Name: National Steel Pellet Co**

**Permit Number: 13700063-001**

Appendix I as attached.

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 13700063-001**

This Technical Support Document (TSD) is for all the interested parties of the draft permit and to meet the requirements that have been set forth by the federal regulations and Minnesota rules (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 draft permit.

**1. General Information**

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

<b>Applicant/Address</b>	<b>Stationary Source/Address (SIC Code: 1011 )</b>
National Steel Pellet Company (NSPC)	National Steel Pellet Company
P.O. Box 217	P.O. Box 217
Keewatin, Minnesota 55753	Keewatin, Minnesota 55753

**1.2. Description Of The Permit Action**

NSPC is one of seven taconite pellet production plants that has applied for a Title V operating permit under the new Title V operating permit program. NSPC submitted an application on January 17, 1995, for a Title V operating permit. NSPC had proposed a Direct Reduced Iron (DRI) expansion in 1995, and NSPC was chosen to be the first taconite plant to receive a Title V permit to expedite NSPC's pursuit of a DRI expansion. However, later in 1995, NSPC shelved its plan for a DRI expansion. In the interim Permittee Title V application was reviewed by five test permit teams to test the Minnesota Pollution Control Agency's (MPCA) new Delta database system for a larger facility in May through July of 1995. The new Delta data base will help in the generation of most permits by reducing generation time and it will help track compliance actions and scheduled items required by the Title V permits.

Under Minn. R. 7007.0700, subp. B, the application was deemed administratively complete on March 15, 1995, since the MPCA did not finish its review within the 60 day period under this subpart. In August 1995, the MPCA assigned the current permit team to compile the results of the reviews of the earlier five test permit teams and to develop the Title V operating permit for NSPC. The current permit team notified NSPC of the deficiencies in their application in a letter dated August 18, 1995. Under Minn. R. 7007.0700, subp. D, the MPCA requested more information and revisions to NSPC's Title V operating permit application. The lengthy review of this application is understandable due to the complexity and size of a taconite plant. It has taken considerable effort on the part of the MPCA and the NSPC to work through the new Title V operating permit program requirements. The experience and knowledge gained from working through the Title V permitting process with NSPC will streamline the process for the other six taconite plants.

The source was built in two phases with each phase having one induration furnace. Currently the NSPC is operating the phase two equipment and a portion of the phase one equipment. The phase one induration furnace and its associated equipment (EU019, EU021, EU023, EU027 - EU029) are not in operation and have been idled since the early 1980s, due to market conditions. NSPC wants to retain the right to resume operation of the idled phase one emission units should market conditions improve. This draft permit contains requirements to address compliance issues should NSPC decide to resume operation of the idled phase one equipment.

A summary of the correspondence relating to this permit action is attached to this TSD. In the remainder of the TSD NSPC shall be referred to as the Permittee.

### 1.3. Emissions of the Facility

Following is a summary of potential to emit rates in tons per year (tpy) attributable to the Facility. An emission summary is attached to the TSD. The emission summary is based on the calculations provided by Permittee in their application submitted on February 22, 1996, and some of the calculations were revised based on MPCA review to more accurately reflect the emissions of the facility.

**Table 1. Total Facility Potential to Emit Summary and Attainment Status:**

<b>Pollutant</b>	<b>Potential to Emit (Tons/year =TPY)</b>	<b>Attainment or Unclassified? (Yes or No)</b>
Particulate Matter (PM)	8,956.8	Not Applied
Particulate Matter less than 10 micron (PM <sub>10</sub> )	4,113.9	Yes
Sulfur Dioxide (SO <sub>2</sub> )	1,997.0	Yes
Nitrogen Oxides (NO <sub>x</sub> )	11,402.0	Yes
Volatile Organic Compounds (VOCs)/Ozone	56.5	Yes
Carbon Monoxide (CO)	127.9	Yes
Lead	0.5	Yes
Hazardous Air Pollutants (Total)	34.2	Not Applied

The PTE is the PTE as limited by the proposed permit.

**Table 2. Facility Classification**

Classification (put x in appropriate box)	Major	Synthetic Minor	Minor	N/A
Prevention of Significant Deterioration	X			
Non Attainment Area (list pollutant)				X
Operating Permit Program	X			

## **2. Regulatory and/or Statutory Basis of Emission Limits and Permit Requirements**

The proposed draft permit is organized into a cover page section, Table A and Table B. The cover page section has four pages and contains the Permittee's name and address and other standard requirements. Table A contains the Emission limits and requirements of the proposed permit. Table A is further broken down into five subparts which organize the emission limits and requirements at different levels. The levels are the entire Facility (FC), Stack/Vent (SV), Emission Unit (EU), Control Equipment (CE) and Fugitive Source (FS). Table B contains the submittal requirements of the permit. The submittals include notifications, compliance plans and modeling.

### **2.1 Table A: Requirements and Emission Limits**

Table A contains the emissions limits and other requirements including monitoring, record keeping and modeling requirements. This TSD details the emissions limits and the requirements that are unique to this permit. Requirements that are general to all permits issued by the MPCA are not detailed in this TSD. If you have any questions about a requirement contained in the proposed draft permit that is not detailed in the TSD please contact the contact person given at the end of this TSD.

#### **2.1.1 Table A: Requirements and Emission Limits that apply to the entire Facility (FC)**

<i>Emission Limit and/or Requirement</i> - Air Pollution Control Equipment: Operate all air pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.
<i>Factual and legal basis for above:</i> Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
<i>Comments:</i> NA

<i>Emission Limit and/or Requirement</i> - Comply with the Operation and Maintenance (O&M) Plan: Follow the actions and record keeping specified in the O&M plan. The plan may be amended with Commissioner's written approval.
<i>Factual and legal basis for above:</i> Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp 16(J)
<i>Comments:</i> NA

<i>Emission Limit and/or Requirement</i> - Monitoring Equipment: Install or make needed repairs to monitoring equipment within 180 days of permit issuance, if monitoring equipment is not installed on the date the permit is issued for CE001 - CE018, CE020, CE022, CE024, CE030 - CE032, and CE034 - CE036.
<i>Factual and legal basis for above:</i> Minn. R. 7007.0800, subp. 4(D)

*Comments:* The Permittee does not currently have monitoring equipment on all of its pollution control equipment. The MPCA has determined that 180 days after permit issuance is a sufficient amount of time for all such monitoring equipment to be installed and/or repaired. The pieces of control equipment (CE) listed are the CE that are currently active at the facility.

*Emission Limit and/or Requirement:* Monitoring Equipment Debugging, Troubleshooting, and Establishment of Parameter Ranges: Complete within 180 days of installation or of completion of needed repairs of all monitoring equipment, including the air pollution control equipment operating at the time of permit issuance CE001 - CE018, CE020, CE022, CE024, CE030 - 032 and CE034 - CE036, and the idled phase one air pollution control equipment that may resume operation in the future, CE019, CE021, CE023, CE027 - CE029 and CE033.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D)

*Comments:* Once the monitoring equipment is installed and/or repaired the MPCA has determined that 180 days is a sufficient amount of time to debug, troubleshoot, and establish parameter ranges for normal CE operation. The pieces of control equipment (CE) listed are the CE that are currently active at the facility and the CE that may resume operation in the future.

*Emission Limit and/or Requirement - Monitoring Equipment:* Install or make needed repairs to monitoring equipment within 30 days of resuming operation of any idled phase one emission units and associated air pollution control equipment. The idled phase one air pollution control equipment are CE019, CE021, CE023, CE027 - CE029 and CE033.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D)

*Comments:* The pieces of Control Equipment (CE) listed are the currently idled phase one CE at the facility. The Permittee may decide to resume operation of these idled units in the future. The shorter time to complete the installation or making needed repairs to monitoring equipment is warranted since there are fewer idled units and installation could be accomplished during the resumption of operation activities.

*Emission Limit and/or Requirement - Visible Emissions Check:* Prior to approval of the O&M Plan, the Permittee shall check visible emissions from SV001-032, 034, 037, and 038 once daily when in operation during daylight hours. A form(s) meeting the requirements of Appendix I shall be used to indicate whether process or control equipment requires attention. In the event the Permittee makes a finding that attention is required, the Permittee shall investigate the process and control equipment performance and implement appropriate corrective action, if necessary.

Upon approval of the O&M Plan, the Permittee shall check visible emissions from SV001-032, 034, 037, and 038 once daily when in operation during daylight hours. The Permittee shall use the visible emissions checklists in the O&M Plan as a means to indicate when appropriate corrective actions in the O&M Plan should be taken.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* Visible emissions can give a good indication of control equipment performance. This requirement requires the Permittee to check visible emissions daily and follow existing internal policies to correct any control equipment problems. This requirement is effective until the Operation and Maintenance (O&M) plan is approved. Once approved, the O&M plan will be followed. Also, the Stack/Vent (SV) numbers listed are those SV which have CE associated with them.

*Emission Limit and/or Requirement - Visible Emissions Checklist(s):* The Permittee shall use one or more checklists that contain SV001-032, 034, 037, 038. These checklist(s) will be a part of the O&M plan. The checklist or checklists must contain at a minimum the information contained in Appendix I.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* The information contained in Appendix I, which is attached to this TSD, contains all of the information to ensure that the VE checks are properly conducted and recorded.

*Emission Limit and/or Requirement:* For SV003, 029-031 the Visible emissions checklist(s) will require a daily check of pressure drop if the plume is limited by visible moisture. For SV001, 002, 004, 019-022 the Visible emissions checklist(s) will require a daily check of pressure drop and total water pressure if the plume is limited by visible moisture.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* These Stack/Vents (SV) are the 11 highest particulate emitters at this facility. The MPCA has determined that they need to be closely checked for control equipment performance on a daily basis. There are times when high moisture in the exhaust gas of the stack condenses upon its release from the stack making a visible emissions check impossible or extremely difficult. During these times the Permittee is required to daily check the pressure drop for the CE (dry cyclones) associated with SV003, 029-031. During these times the Permittee is required to check daily the pressure drop and total water pressure for the CE (wet scrubbers and wet cyclones) associated SV001, 002, 004, 019-022.

*Emission Limit and/or Requirement - Fugitive Dust Observations:* Prior to the approval of the fugitive control plan, the Permittee shall observe fugitive dust sources FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039 once daily during daylight hours. A form(s) meeting the requirements of Appendix I shall be used to check fugitive dust control practices. In the event the Permittee makes a finding that attention to fugitive dust sources is required, the Permittee shall investigate the fugitive dust sources and implement corrective action, if necessary.

Upon approval of the fugitive control plan, the Permittee shall observe fugitive dust sources FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039 once daily during daylight hours. The Permittee shall use the fugitive sources visible emissions checklist(s) in the fugitive dust control plan as a means to indicate when appropriate corrective actions in the fugitive control plan are taken.



*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* Fugitive sources of PM at this facility can generate a significant amount of visible emissions. To reduce the amount of fugitive emissions generated from the facility the Permittee is being required to prepare a fugitive emissions control plan and to conduct daily observations of the largest sources of fugitive emissions from this facility. The Permittee will check visible emissions daily from permit issuance. The Permittee will follow existing internal policies to correct any fugitive problems prior to approval of the Fugitive Control Plan. Once the fugitive control plan is approved, the actions and procedures in the plan will be followed.

*Emission Limit and/or Requirement - Fugitive Sources Visible Emissions Checklist(s):* The Permittee shall use one or more checklists that contain FS003-005, 007, 009, 011, 014-016, 019, 025, 028, 031-033, and 035-039. These checklist(s) will be a part of the Fugitive Control Plan. The checklist or checklists must contain at a minimum the information contained in Appendix I.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* The information contained in Appendix I, which is attached to this TSD, contains all of the information to ensure that the VE checks are properly conducted and recorded.

*Emission Limit and/or Requirement - Visible Emissions Training:* The Permittee shall (1) ensure that one plant employee obtain an initial EPA Method 9 certification and be recertified every three years or (two) employ a similarly certified contractor. This person will train other plant employees to perform the daily visible emissions check as detailed in the O&M Plan and Fugitive Control Plan.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D) and Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* This training is being required to ensure that the visible emissions checks are conducted in a proper manner and to ensure a consistent assessment among the different observers at the facility. The implementation of the training, including the schedule, will be detailed in the appropriate plan.

*Emission Limit and/or Requirement - Fugitive Control Plan:* Comply with the fugitive control plan. Follow the actions and recordkeeping specified in the fugitive control plan. The plan may be amended with the Commissioners approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, or fugitive control plan, then the Permittee may be required to amend the fugitive control plan.

*Factual and legal basis for above:* Minn. R. 7011.0150

*Comments:* Since all taconite plants can generate a significant amount of fugitive emissions this facility is being required to implement and follow a fugitive emissions control plan.

*Emission Limit and/or Requirement - Material Usage:* less than or equal to 1.5% by weight of the pellet weight shall be the limit for fluxstone (limestone, dolomite, or similar additives) usage in pellet production on a calendar month average.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2

*Comments:* This limit is being carried forward from Air Emission Permit No. 13700063-006 (62B-95-I/O-2), which was issued for the Permittee's semi-flux pellet project.

*Emission Limit and/or Requirement* - Maintain monthly fluxstone purchase and pellet production records: calculate the percentage of fluxstone usage and maintain these records on site within 15 days after the end of the month; include these records and the 1.5% fluxstone usage limit when reporting deviation.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2

*Comments:* This limit is being carried forward from Air Emission Permit No. 13700063-006 (62B-95-I/O-2) which was issued for the Permittee's semi-flux pellet project.

*Emission Limit and/or Requirement* - Contractors: The Permittee shall retain records on site of all contractors that are allowed on site that include any crushers, screens and conveyors. The Permittee shall also retain records on site of all contractors whose operations would require an Air Emissions Permit from the MPCA. The records shall include the contractors company name, MPCA air emissions permit number, short description of activities undertaken by the contractor, estimate of emissions or materials handled and the dates the contractor was on site. The record shall be updated at least monthly.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2

*Comments:* This requirement will allow the MPCA to get data on the types of contractors brought onto taconite plants property and to help evaluate what type of contractors serve as support facilities to the taconite plants. U.S. Environmental Protection Agency (EPA) is in the process of promulgating the collocation rules for the Part 70 permitting program. EPA in a letter dated November 16, 1994, from John Sieitz required the MPCA to include contracted operations in the taconite plants Title V (Part 70) permit applications. However, EPA in a letter dated June 2, 1995, from Deputy Director Lydia Wegman gave the states flexibility to decide for themselves if collocated sources (support facilities) should be permitted with the primary source until EPA finalized rule making on the Part 70 collocation rules. The MPCA has decided not to require contracted operations to be permitted as a part of a taconite plants Part 70 permit until EPA finishes rule making on this issue. Once the collocation rules are finalized the MPCA will use the information obtained by the above requirement to determine which contracted sources will be required to be included in the taconite plants permits. The taconite plants permits will be amended to include any contracted operations which would meet the definition of a collocated source in EPA final rule.

*Emission Limit and/or Requirement* - Prior to resumption of operation of idled phase one equipment, the Permittee shall complete initial modeling of the following idled phase one emission units: EU019, 021, 023, 025, 027, 028, and 029. The modeling shall include all phase one emission units, phase 2 emission units, and fugitive sources.

The initial modeling shall be performed according to the modeling protocol that was approved on March 13, 1997, by the MPCA and revised to include the idled phase one emission units. Any changes to the protocol that were approved by the MPCA and/or EPA in writing after March 13, 1997, shall also be incorporated into the revised protocol.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2 and Minn. R. ch. 7009 and 40 CFR pt. 50

*Comments:* The MPCA conducted preliminary modeling that showed a possible exceedance of the 24 hour PM-10 standard. To further evaluate the Permittee's attainment status with the Minnesota Ambient Air Quality Standards (MAAQS) and the National Ambient Air Quality Standards (NAAQS) the Permittee has already started to conduct refined modeling to address the NAAQS and MAAQS attainment issues for the phase two equipment and the non-idled phase one equipment. To speed up the modeling process and to reduce costs the Permittee has decided not to include the idled phase one emission units in the modeling that is currently underway. This requirement requires the Permittee to conduct initial modeling of the entire facility including any units Permittee wants to resume operation of before the Permittee can resume operation of these idled units. The initial modeling for the resuming operation of the idled phase one units will actually be quite robust and will build upon what is learned from the modeling that is currently underway. The MPCA believes it is prudent to have a evaluation of the facility's MAAQS and NAAQS attainment status before the any idled phase one units resume operation.

*Emission Limit and/or Requirement - Performance Tests:* Performance testing for EU005-018, 020, 022, 024, 030-032, and 037-038 and their associated control equipment and stacks shall be tested at a green ball feed rate of greater than or equal to 810 long tons per hour. The performance testing for EU001-004 and their associated control equipment and stacks shall be tested at greater than or equal to 90% of the emission units rated capacity. If a performance test is conducted at less than the applicable minimum rate given above the Permittee shall be given the opportunity to retest within 90 days of the subject test before process limits can be applied as specified in Minn. R. 7017.2025, subp. 3. Once a process limit has been applied the Permittee may at any time conduct a voluntary performance test at or above the applicable minimum rate in order to remove the process limit.

*Factual and legal basis for above:* Minn. R. 7017.2025

*Comments:* The throughput of several of the emission units that will be tested is directly determined by the throughput of the phase 2 induration furnace. Rather than apply a new operating restriction on this furnace every time a performance test is done on associated equipment, a minimum operating level for all tests has been defined. The value of 810 long tons per hour green ball feed rate represents 95% of the average operating rate of the furnace and 86% of the short term peak rate and as such ensures that the test will be conducted at a rate that is both representative and close to maximum throughput. This language, and the additional flexibility to retest within 90 days before an operating limit can be applied, is needed because furnace throughput is dependent on ore quality and the Permittee has limited control over the ore quality on a daily basis. For those units that are not dependent on furnace throughput, a minimum test rate has been established as 90% of rated capacity. Both approaches are consistent with existing rule and policy on establishing worst case conditions for testing

<i>Emission Limit and/or Requirement</i> - Performance tests meeting the requirements of Minn. R. 7017.2001 through 7017.2060, conducted after May 13, 1997, but before permit issuance may be used to meet the requirements of an initial performance test required by Table A of this permit.
<i>Factual and legal basis for above:</i> Minn. R. 7017.2025
<i>Comments:</i> This requirement allow the Permittee to conduct performance tests during the summer of 1997, that may be used for initial performance tests required in Table A. Testing during the summer months allows more accurate testing to be conducted. Several emission units need to be tested within 180 days of permit issuance which means that for more accurate testing they need to be tested in the summer of 1997.

### 2.1.2 Table A: Requirements and Emission Limits that apply at emission units (EU)

All but one of the emission units have only one stack, however, Emission Unit EU030 (phase two induration furnace) has two stacks. Since a portion of the applicable emission limits applies to the emission unit level and not the stack level the emission limits for this unit were placed at the EU level. The rest of the emission limits for this facility can be found under Section 2.1.3 of this TSD.

Stack/Vent I.D.(S/V): 030 & 031	Emission Unit: EU030 - Phase two induration furnace.
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: less than or equal to 0.3 grains per 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.	
<i>Factual and legal basis for above:</i> Minn. R. 7011.0715, subp. 1(A)	
<i>Comments:</i> N/A	

Stack/Vent I.D.(S/V): 030 & 031	Emission Unit: EU030 - Phase two induration furnace.
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: greater than or equal to 85% collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	
<i>Factual and legal basis for above:</i> Minn. R. 7011.0715, subp. 3	
<i>Comments:</i> N/A	

Stack/Vent I.D.(S/V): 030 & 031	Emission Unit: EU030 - Phase two induration furnace.
<i>Emission Limit and/or Requirement</i> - Opacity: less than or equal to 20% opacity	
<i>Factual and legal basis for above:</i> Minn. R. 7011.0715, subp. 1(B)	
<i>Comments:</i> N/A	

Stack/Vent I.D.(S/V): 030 & 031	Emission Unit: EU030 - Phase two induration furnace.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 365 days after permit issuance to measure PM and Opacity emissions. SV030 and SV031 shall be tested simultaneously.	
<i>Factual and legal basis for above:</i> Minn. R. 7017.2020, subp. 1	
<i>Comments:</i> This emission unit is the largest emitter of particulate at this source and regular	

measurement of emissions from this emission unit is warranted. Due to the lack of data on the total emissions from this emission unit, the Permittee is being required to test both of the stacks (SV030 & 031) at the same time during the performance testing for this emission unit.

Stack/Vent I.D.(S/V): 030 & 031	Emission Unit: EU030 - Phase 2 induration furnace.
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 36 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 36 months between test dates. SV030 and SV031 shall be tested simultaneously.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit has been tested in the past every year, however, only one of the two stacks was tested during each test. The emission unit has shown it has the ability to comply with the collection efficiency requirement of Minn. R. 7011.0715, subp. 3, each year. Based on this history of compliance, the testing frequency has been relaxed to once every three years. However, we have no test data on what the total emissions are from the simultaneous operation of the stacks. Due to the lack of data on the total emissions from this emission unit the Permittee is being required to test both of the stacks (SV030 & 031) at the same time during the performance testing for this emission unit.	

### 2.1.3 Table A: Requirements and Emission Limits that apply at the Stack/Vents (SV)

Most of the emission limits were placed at the SV level so they could be grouped with their performance testing requirements. All of the emission units referenced in this section only have one stack each. The requirements for the SV level has been further broken down into an emission limit, performance testing and requirements sections.

#### Emission Limits:

Stack/Vent I.D.(S/V): 001 - 028, 32, 34	Emission Unit: 001 - 028, 32, 34 - Process equipment including crushing, grinding and agglomerating emission units
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: less than or equal to 0.3 grains per 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.	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 1(A) or Minn. R. 7011.0715, subp. 1(A)	
Comments: The same limit applies to both pre and post 1969 process equipment even though they have separate rule citations.	

Stack/Vent I.D.(S/V): 001 - 028, 32, 34	Emission Unit: 001 - 028, 32, 34 - Process equipment including crushing, grinding and agglomerating emission units
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: greater than or equal to 85% collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an alternative demonstration of compliance to Total Particulate Matter Limit.)	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 3 or Minn. R. 7011.0715, subp. 3	
Comments: The same limit applies to both pre and post 1969 process equipment even though they have separate rule citations.	

Stack/Vent I.D.(S/V): 002, 004, 011-014, 016, 018, 020, 022, 024, 026, 032	Emission Unit: 002, 004, 011-014, 016, 018, 020, 022, 024, 026, 032 - Post 1969 Process equipment including crushing, grinding and agglomerating emission units
<i>Emission Limit and/or Requirement</i> - Opacity: less than or equal to 20% opacity	
Factual and legal basis for above: Minn. R. 7011.0715, subp. 1(B)	
Comments: These units were installed during the phase two expansion of the source in 1973	

Stack/Vent I.D.(S/V): 001, 003, 005-010, 015, 017, 019, 021, 023, 025, 027, 028	Emission Unit: 001, 003, 005-010, 015, 017, 019, 021, 023, 025, 027, 028 - Pre 1969 process equipment
<i>Emission Limit and/or Requirement</i> - Opacity: less than or equal to 20% opacity, except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 1(B)	
Comments: These units were installed during the original construction of the source called phase one.	

Stack/Vent I.D.(S/V): 029	Emission Unit: EU029 - Phase one induration furnace.
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: less than or equal to 0.3 grains per 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.	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 1(A)	
Comments: N/A	

Stack/Vent I.D.(S/V): 029	Emission Unit: EU029 - Phase one induration furnace.
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: greater than or equal to 85% collection efficiency or higher for the pollution control equipment, the entire emission facility is in compliance with NAAQS and MAAQS, and the emission facility is located not less than one-fourth mile from any residence or public roadway. (This is an Alternative demonstration of compliance to Total Particulate Matter Limit.)	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 3	
Comments: N/A	

Stack/Vent I.D.(S/V): 029	Emission Unit: EU029 - Phase one induration furnace.
<i>Emission Limit and/or Requirement</i> - Opacity: less than or equal to 20% opacity, except that the following is allowed: A maximum of 60% opacity for 4 minutes in any 60-minute period and a maximum of 40% opacity for 4 additional minutes in any 60-minute period.	
Factual and legal basis for above: Minn. R. 7011.0710, subp. 1(B)	
Comments: N/A	

Stack/Vent I.D.(S/V): 037 & 038	Emission Unit: EU037 & 038 Pellet screening project
<i>Emission Limit and/or Requirement</i> - Total Particulate Matter: less than or equal to 0.05 grams/dry standard cubic meter.	
Factual and legal basis for above: 40 CFR Part 60.385(b); Minn. R. 7011.2700	
Comments: N/A	

### Performance Testing:

Some of the emission units and their associated stacks are very similar. The performance tests of similar emission units are grouped together and are contained at the Group (GP) level of Table A. The performance test requirements below are for those stack vents and emission units that are substantially unique and can not be grouped with other emissions due to differences in function, size and or control equipment. For emission units and their associated stacks that have never been tested the testing frequency can not be defined at this time and as such the Permittee is required to submit a testing frequency plan under Table B one time submittals.

Stack/Vent I.D.(S/V): 001	Emission Unit: EU001 - Primary crusher No. 1.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1460 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. This emission unit was tested in January 1995 and demonstrated compliance by a wide margin. Due to many factors including the margin of compliance of past tests the testing of this emission unit later in the life of this permit is warranted.	

Stack/Vent I.D.(S/V): 001	Emission Unit: EU001 - Primary crusher No. 1.
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 60 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 60 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to many factors including the margin of compliance of past tests a less frequent testing frequency for this emission unit is warranted	

Stack/Vent I.D.(S/V): 002	Emission Unit: EU002 - Primary crusher No. 2.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 730 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, and margin of compliance of past tests. This emission unit and its associated stack have never been tested and it is a medium source of emissions at this source. Subsequent testing will be determined by the Testing Frequency Plan, a plan the Permittee must submit under Table B of the proposed draft permit	



Stack/Vent I.D.(S/V): 003	Emission Unit: EU003 - Drive house No. 1.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1460 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, and margin of compliance of past tests. This emission unit was tested in August 1995, and demonstrated compliance by a wide margin after repairs were made to the control equipment. Due to many factors including the margin of compliance of past tests a testing of this emission unit later in the life of this permit is warranted.	

Stack/Vent I.D.(S/V): 003	Emission Unit: EU003 - Drive house No. 1.
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 60 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 60 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to many factors including the margin of compliance of past tests a less frequent testing frequency for this emission unit is warranted	

Stack/Vent I.D.(S/V): 004	Emission Unit: EU004 - Drive house No. two.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1460 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. This emission unit and its associated stack have never been tested and is a small source of emissions at this source. Subsequent testing will be determined by the Testing Frequency Plan, a plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 023	Emission Unit: EU023 - Cooler Dump Zone Phase one.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after resuming operation of EU023 to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit is currently idled. When and if EU023 resumes operation the EU will be one of the largest emitters at this source. EU023 has never been tested so early testing is required to accurately ascertain the amount of emissions from EU023 and to be used as one of many methods to determine compliance. Follow-up testing will be determined by a testing frequency plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 024	Emission Unit: EU024 - Cooler Vibrating feeder phase two.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 730 days after permit issuance	

to measure PM and Opacity emissions.
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. This emission unit was tested in 1988 and demonstrated compliance by a wide margin and as such testing of this emission unit could be delayed. Due to many factors including the margin of compliance of past tests a testing of this emission unit later in the life of this permit is warranted. This is a medium source of emissions at this source.

Stack/Vent I.D.(S/V): 024	Emission Unit: EU024 - Cooler Vibrating feeder phase two.
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 60 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 60 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to many factors including the margin of compliance of past tests a less frequent testing frequency for this emission unit is warranted	

Stack/Vent I.D.(S/V): 025	Emission Unit: EU025 - Pellet Cooler Phase one.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after resuming operation of EU025 to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit is currently idled. When and if EU025 resumes operation the EU could be one of the largest emitters at this source. EU025 has never been tested so early testing is required to accurately ascertain the amount of emissions from EU025 EU023 and to be used as one of many methods to determine compliance. Follow-up testing will be determined by a testing frequency plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 026	Emission Unit: EU026 - Pellet Cooler phase two.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. This emission unit was tested in 1988 and failed the performance test. Upon retesting the emission unit was in compliance by a small margin. This emission unit is one of the largest emitters at this source. Due to the small margin of compliance upon retesting and the amount of emissions from this emission unit closer scrutiny is warranted, including testing shortly after permit issuance.	

Stack/Vent I.D.(S/V): 026	Emission Unit: EU026 - Pellet Cooler phase two.
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 12 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 12 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to the small a margin of compliance upon retesting and the amount of emissions from this emission unit closer scrutiny is warranted for this emission unit including more frequent testing required above.	

Stack/Vent I.D.(S/V): 026	Emission Unit: EU026 - Pellet Cooler phase two.
<i>Emission Limit and/or Requirement</i> - Performance testing frequency for Total PM and Opacity can be changed to once every three years after three consecutive annual tests have demonstrated compliance with the emission limits.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: Once the Permittee has demonstrated a compliance trend then it is reasonable to allow the testing frequency to be relaxed to once every three years. If the first two performance tests show compliance after permit issuance the Permittee will be allowed to count the 1988 retest results as one of the three consecutive tests that show compliance to relax the testing frequency. If the Permittee fails to show compliance with either of the first two performance tests after permit issuance, the 1988 performance retest will not be one of three consecutive tests and can not be used to relax the testing frequency.	

Stack/Vent I.D.(S/V): 027	Emission Unit: EU027 - Cooler vibrating feeder phase one
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after resuming operation of EU027 to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit is currently idled. When and if EU027 resumes operation the EU will be one of the largest emitters at this source. EU027 has never been tested so early testing is required to accurately ascertain the amount of emissions from EU029 EU023 and to be used as one of many methods to determine compliance. Follow-up testing will be determined by a testing frequency plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 028	Emission Unit: EU028 - Pellet Product Conveyor phase one
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after resuming operation of EU028 to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit is currently idled. When and if EU028 resumes operation the EU will be one of the largest emitters at this source. EU028 has never been tested so early testing is required to accurately ascertain the amount of emissions from EU028 EU023 and to be used as one of many methods to determine compliance. Follow-up testing will be determined by a testing frequency plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 029	Emission Unit: EU029 - Phase one induration furnace.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after resuming operation of EU029 to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: This emission unit is currently idled. When and if EU029 resumes operation the EU will be one of the largest emitters at this source. EU029 has never been tested so early testing is required to accurately ascertain the amount of emissions from EU029 EU023 and to be used as one of many methods to determine compliance. Follow-up testing will be determined by a testing frequency plan the Permittee must submit under Table B of the proposed draft permit	

Stack/Vent I.D.(S/V): 032	Emission Unit: EU032 - Pellet cooler product belts.
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 730 days after permit issuance to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. This emission unit and its associated stack have never been tested and is a medium source of emissions at this source. Subsequent testing will be determined by the testing frequency plan.	

SV034 is a small and intermittent source of emissions so it will not be required to be tested at this time.

#### **Requirements:**

Stack/Vent I.D.(S/V): 001 - 038	Emission Unit: EU001 - 038
<i>Emission Limit and/or Requirement</i> - Process monitoring: the visual emissions observer in the facility staff shall check stack visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.	
Factual and legal basis for above: Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)	
Comments: This is intended to be a quick check of the stacks to determine if there is a change in visible emissions that may require attention. This requirement compliments the requirement for the visible emissions check contained at the FC level of table A.	

#### **2.1.4 Table A: Requirements and Emission Limits that apply at the control equipment (CE)**

Emission Unit I.D.: EU001-032, 034, 037, 038	Control Equipment: CE001-032, 034, 037, 038
<i>Emission Limit and/or Requirement</i> - Gas Stream Pressure drop: Monitor and record once every seven (7) days when in operation once the pressure gauge is installed. Complete pressure drop monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	
Factual and legal basis for above: Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)	

Comments: Currently the CE do not have pressure gauges installed. Table A at the FC level requires the Permittee to install pressure gauges to these pieces of CE. Once the pressure gauges are installed the Permittee will conduct weekly readings of the pressure drop. Once the pressure gauge is installed the Permittee is allowed up to 180 days to debug the system and to establish the parameter ranges for normal and proper operation of the control equipment. This requirement applies to the baghouses, dry cyclones, wet cyclones and wet scrubbers.

Emission Unit I.D.: EU001, 002, 016, 019-028, 032, 034	Control Equipment: CE001, 002, 016, 019-028, 032, 034
<i>Emission Limit and/or Requirement</i> - Total water pressure: Monitor and record once every seven days when in operation once the total water pressure gauge is installed. Complete water total pressure monitoring equipment debugging, troubleshooting, and establishment of parameter range within 180 days of installation.	
Factual and legal basis for above: Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)	
Comments: Currently the CE do not have pressure gauges installed. Table A at the FC level requires the Permittee to install pressure gauges to these pieces of CE within 180 days of permit issuance for the non-idled emission units. The Permittee must install the pressure gages for the idled units within 30 days of resuming operation. Once the pressure gauges are installed the Permittee will conduct weekly readings of the pressure drop. Once the pressure gauge is installed the Permittee is allowed up to 180 days to debug the system and to establish the parameter ranges for normal and proper operation of the control equipment. This requirement applies to the wet cyclones and wet scrubbers. The MPCA believes that total water pressure is a reasonable measure of control equipment performance when used in conjunction with the daily visible emissions checks. Total water pressure alone is not a reasonable measure of performance. Please read the attached MPCA Memorandum on Water Total Pressure for a detailed description of the limitations of the total water pressure method.	

Emission Unit I.D.: EU037, 038	Control Equipment: CE037, 038
<i>Emission Limit and/or Requirement</i> - Gas Stream Pressure Drop: Monitor and record once every seven days when in operation.	
Factual and legal basis for above: 40 CFR Section 60.385(b); Minn. R. 7011.2700	
Comments: The monitoring equipment for these emission units are already in place since these emission units are subject to NSPS.	

Emission Unit I.D.: EU037, 038	Control Equipment: CE037, 038
<i>Emission Limit and/or Requirement</i> - Liquid Flow Rate: Monitor and record once every seven (7) days when in operation.	
Factual and legal basis for above: 40 CFR Section 60.385(b); Minn. R. 7011.2700	
Comments: The monitoring equipment for these emission units are already in place since these emission units are subject to NSPS.	

### 2.1.5 Table A: Requirements and Emission Limits that apply at the fugitive sources (FS)

Fugitive Source: FS003-005, 007, 008, 009, 011, 014-016, 019, 025, 028, 031-033, 035-039
<i>Emission Limit and/or Requirement</i> - Process monitoring: the visual emissions observer in the facility staff shall check fugitive visible emissions (opacity) once daily using a checklist that at a minimum contains the information required in Appendix I.
Factual and legal basis for above: Minn. R. 7007.0800, subp. 4(D); Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Comments: Fugitive emissions are a major source of emissions at this source. The FS listed above require special attention, due to large emissions potential from these sources. The daily check will help the Permittee monitor these emission and implement dust suppression activities as needed, and provide MPCA staff with documentation of these activities.

### 2.1.5 Table A: Requirements and Emission Limits that apply at the Group level (GP)

These groups represent groups of emission units and associated control equipment that are substantially similar in size, function and control equipment that if one unit can demonstrate compliance then it is reasonable to assume that the other emission units in the same group will be able to demonstrate compliance as long as the emission units and control equipment are properly maintained and operated.

Stack/Vent I.D.(S/V): SV005-010 Crude ore feed lines (Ducon /UW-4)	Group number: GP001
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after permit issuance on one (1) representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: These six crude ore feed lines have Ducon /UW-4 wet scrubbers with similar operating characteristics. In developing a testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. These emission units have never been tested and they are small source of emissions at this source. Subsequent testing will be determined by the testing frequency plan.	

Stack/Vent I.D.(S/V): SV011-014 Crude ore feed lines	Group number: GP002
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1,095 days after permit issuance on one (1) representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: These four crude ore feed lines have Riley wet scrubbers scrubbers with similar operating characteristics. In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests SV014 was tested in 1988 and was in compliance by a wide margin and they are small source of emissions at this source. Based on the above facts other emission units are a higher priority to test and as such the testing of these emission units can be delayed until later in the permit. Subsequent testing will be determined by the testing frequency plan.	

Stack/Vent I.D.(S/V): SV019, 020 Phase one & two grate feed	Group number: GP003
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1,095 days after permit issuance on one (1) representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests SV014 was tested in 1988 and was in compliance by a wide margin and they are small source of emissions at this source. Based on the above facts other emission units are a higher priority to test and as such the testing of these emission units can be delayed until later in the permit. Subsequent testing will be determined by the testing frequency plan.	

Stack/Vent I.D.(S/V): SV019, 020 Phase one & two grate feed	Group number: GP003
<i>Emission Limit and/or Requirement</i> - Resumption Performance test: due 180 days after resumption of operation of EU019 to measure PM and Opacity emissions. This test is in addition to the other testing for GP003.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: EU019 has never been tested and has been idled for over 15 years. This performance test is to validate our assumption that the phase one and two grate feed are in fact substantially similar and that performance testing of one is valid for both.	

Stack/Vent I.D.(S/V): SV021, 022 Phase one & two grate discharge	Group number: GP004
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 180 days after permit issuance on one representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests These emission unit shave never been tested and they are large source of emissions at this source. Based on the above facts these emission units are a higher priority to test and as such the testing of these emission units is required earlier in the permit. Subsequent testing will be determined by the testing frequency plan.	

Stack/Vent I.D.(S/V): SV021, 022 Phase one & two grate discharge	Group number: GP004
<i>Emission Limit and/or Requirement</i> - Resumption Performance test: due 180 days after resumption of operation of EU021 to measure PM and Opacity emissions. This test is in addition to the other testing for GP004.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: EU021 has never been tested and has been idled for over 15 years. This performance test is to validate our assumption that the phase one and two grate discharge are in fact substantially similar and that performance testing of one is valid for both.	

Stack/Vent I.D.(S/V): SV037, 038 Pellet screen project	Group number: GP005
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1,095 days after permit issuance on one (1) representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests These emission units have been tested in 1996. SV038 showed non compliance with its first performance test and upon retest it did show compliance. The MPCA is separately addressing the test failure with the Permittee to assure continued operation in compliance. They are a small source of emissions. Based on the above facts these emission units are a lower priority to test and as such the testing of these emission units is warranted later in the life of this permit.	

Stack/Vent I.D.(S/V): SV037, 038 Pellet screen project	Group number: GP005
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 60 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 60 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to many factors including the small emissions of these emission units a less frequent testing frequency for this emission unit is warranted	

Stack/Vent I.D.(S/V): SV015, 016 Phase one & two additive blending	Group number: GP006
<i>Emission Limit and/or Requirement</i> - Initial Performance test: due 1,460 days after permit issuance on one (1) representative unit to measure PM and Opacity emissions.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. These emission units have never been tested and they are small source of emissions at this source. Based on the above facts other emission units are a higher priority to test and as such the testing of these emission units can be delayed until later in the permit. SV015 is a piece of phase one equipment which is not idled.	



Stack/Vent I.D.(S/V): SV015, 016 Phase one & two additive blending	Group number: GP006
<i>Emission Limit and/or Requirement</i> - Performance test: due before of each 60 months following the initial performance test to measure PM and Opacity emissions. The test shall be conducted at an interval not to exceed 60 months between test dates.	
Factual and legal basis for above: Minn. R. 7017.2020, subp. 1	
Comments: In developing testing program for this source many factors were taken into account including how often the emission unit has been tested, has the unit ever been tested, margin of compliance of past tests. Due to many factors including the small emissions of these emission units a less frequent testing frequency for this emission unit is warranted	

## 2.2 Table B: Submittal Requirements

Table B has two parts, one for one time submittals and another for recurring submittals.

### 2.2.1 Table B: One Time Submittals

<i>Submittal Requirement</i> - The Permittee shall provide an O&M plan for review and approval by the Commissioner. The O&M plan shall identify all air pollution control equipment, a preventative maintenance program for that equipment, description of corrective actions to be taken in the event of a malfunction or breakdown, description of the employee training program, and the records kept to demonstrate plan implementation. The Commissioner may require additions or changes to the O&M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan. The O&M plan is due 120 days after permit issuance.
<i>Factual and legal basis for above:</i> Minn. R. 7007.0800, subp. 4(D), Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
<i>Comments:</i> The facility emits significant amount of air emissions and the control equipment does experience wear and occasional breakdowns due to the type of material being processed. The MPCA has determined that an O&M plan is needed to ensure the control equipment receives routine maintenance and repair and operates in a manner to minimize air emissions. The plan will be based on the plan outline provided by the Permittee on December 12, 1996, as attached to this TSD. The plan may be amended upon written approval of the commissioner.

<i>Submittal Requirement</i> - The Permittee shall revise the O&M plan to include the phase one emission units and associated air pollution control equipment after resuming operation of any phase one equipment. The idled phase one associated air pollution control equipment is CE019, CE021, CE023, CE027 - CE029 and CE033. Revision of the O&M plan shall include the normal operating ranges for all pollution control equipment monitoring devices. The revisions to the Operations and Maintenance plan is due 210 days after resuming operation.
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*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 4(D), Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)

*Comments:* There is no data which exists that can establish the normal operating range for the idled pieces of control equipment that will minimize air emissions. The MPCA has determined that 210 days after resuming operation allows the Permittee enough time to evaluate the normal operating ranges for the control equipment that will minimize air emissions and be indicative of proper performance.

*Submittal Requirement - Fugitive Control Plan:* due 90 days after permit issuance for review and approval by the Commissioner. The plan shall identify all fugitive emission sources, primary and contingent control measures and practices, and records kept. The plan will include a statement of objectives, fugitive emission sources, operating and control measures, dust suppressant application description, corrective actions, training, and records. The Commissioner may require additions or changes to the Fugitive Emission Control Plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.

*Factual and legal basis for above:* Minn. R. 7011.0150

*Comments:* The Permittee like all of the taconite plants can be major sources of fugitive PM emissions unless proper control measures are taken. The fugitive control plan will detail how the Permittee will minimize of fugitive PM emissions, and will be based on the plan outline provided by the Permittee on December 13, 1996, and attached to this TSD.

*Submittal Requirement - Refined modeling of fugitive sources and all non-idled units shall be conducted if the Initial Dispersion Modeling results do not demonstrate attainment with the NAAQS and MAAQS. If needed, these Computer Dispersion Modeling Results due before January 1, 1998 (if needed).*

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2 , Minn. R. ch. 7009, 40 CFR pt. 50

*Comments:* The submittal date has been discussed at length with the Permittee and it is a reasonable due date given the information on hand at the time of permit public notice. The results of this modeling will determine if there is a need for Permittee to submit a compliance plan to bring the Permittee into attainment with the NAAQS and MAAQS. This modeling only addresses the fugitive sources and emission units that are not idled. Separate modeling will be conducted when and if the Permittee decides to resume operation of any of the idled phase one emission units.

*Submittal Requirement - Refined modeling results for all non idled emission units and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling. If required, the Compliance Plan: due 30 days after submitting the Computer dispersion modeling results.*

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2, Minn. R. ch. 7009 and 40 CFR pt. 50

*Comments:* The refined modeling should have exhausted most modeling approaches to model attainment with the NAAQS and MAAQS. The compliance plan will focus ensuring that the facility is in attainment with the NAAQS and MAAQS. It is possible that additional modeling may be part of the compliance plan, however it will not delay other approaches to assuring attainment such as establishing an ambient air monitoring network. The compliance plan will also cover pollution prevention, additional controls and/or process restrictions in the event Permittee can not model attainment with the NAAQS and MAAQS. A compliance plan with excessive additional modeling will not be allowed by the MPCA. This compliance plan requirement deals with non attainment issues dealing with the non-idled emission units only. A separate compliance plan will be required if modeling of the idled phase one units show nonattainment when they resume operation.

*Submittal Requirement* - Total facility initial modeling of all phase one emission units, phase two emission units, and fugitive sources. The Permittee shall submit a revised modeling protocol based on the modeling protocol that was approved on March 13, 1997, by the MPCA and revised to include the idled phase one emission units. Any changes to the protocol that were approved by the MPCA and/or EPA in writing after March 13, 1997, shall also be incorporated into the revised Computer Dispersion Modeling Protocol: due 90 days before Resuming Operation.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2, Minn. R. ch. 7009 and 40 CFR pt. 50

*Comments:* The modeling protocol that will be used for modeling the impact of the facility with the idled phase one emission units back in operation will take advantage of all that is learned in the modeling for the currently operating emission units. The initial modeling in many respects will actually be quite refined since most if not all of the modeling issues should be resolved during the modeling of the currently active emission units. The modeling protocol is due 90 days before resuming operation of any of the idled phase one emission units.

*Submittal Requirement* - Total facility initial modeling results of all phase one emission units, phase two emission units, and fugitive sources shall be submitted prior to resuming operation of idled phase one emission units. The Total Facility Computer Dispersion Modeling Results: due 60 days before Resuming Operation.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2, Minn. R. ch. 7009 and 40 CFR pt. 50

*Comments:* The total facility modeling results are due 60 days before resuming operation of any idled phase one units. The modeling will be used for an attainment status determination with the NAAQS and MAAQS.

*Submittal Requirement* - Total facility modeling results of all phase one emission units, phase two emission units, and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling. If required, the Compliance Plan: due 30 days before Resuming Operation

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2, Minn. R. ch. 7009 and 40 CFR pt. 50

*Comments:* If the initial modeling does not show compliance with the NAAQS and MAAQS the compliance plan may contain additional modeling. However, at this stage most of the modeling issues should have been resolved due to the earlier modeling and as such any additional, modeling should only be of short duration. Any modeling component of the compliance plan will be as expedient as the initial total facility modeling, with the plan focusing on bringing the facility into attainment with the NAAQS and MAAQS. The MPCA believes it is prudent that the Permittee have a compliance plan in place before resuming operation of any idled phase one emission units. The plan is needed since there is a significant possibility that a large capital expense may be required to bring the facility into attainment with the NAAQS and MAAQS. At a minimum it is likely a ambient air quality monitoring network will need to be established by the Permittee in the event of modeled nonattainment.

*Submittal Requirement* - Notification due 15 days after resuming operation of idled phase one emission units EU019, EU021, EU023, EU025, EU027, EU028, and EU029.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2

*Comments:* This requirement allows the MPCA to track when submittals related to the resuming of operation of the above idled phase one emission units (EU) are due.

*Submittal Requirement* - Testing Frequency Plan: due 90 days after initial performance test required by this permit. Could be 1, 3, or 5 year intervals depending on the margin of compliance during the initial performance test required by this permit.

*Factual and legal basis for above:* Minn. R. 7007.0800, subp. 2

*Comments:* Many emission units at Permittee have never been tested. After each of the initial performance test required by this permit are completed, the Permittee must submit a testing frequency plan for the associated units. The MPCA will follow current guidance at the time of the test to evaluate the Permittee's testing frequency plans. In general the closer a emission unit is to its emission limit the more frequent the testing should be.

**Note:**

Table B contains air dispersion modeling and compliance plan submittals for both the existing operations and the resuming of operation of the idled phase one emission units. Due to the inherent limitations in the database that is used to generate the permit, Table B can be confusing to read. Attached to this TSD you will find a fact sheet which contains all of the Table B submittals using the language contained in the proposed draft permit but rearranges some of the grammar to make Table B more understandable. The content and intent of the permit is contained in the fact sheet, however, the fact sheet rearranges some of the text for better organization that can not be accomplished in the database.

### **2.2.2 Table B: Recurring Submittals**

This proposed draft permit contains standard recurring submittal requirements for performance test report, emission inventory, semiannual deviations reporting, and compliance certification that are common to all permits issued by the MPCA.

### **3. Conclusion**

Based on the information provided by the National Steel Pellet Company, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 13700063-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

<b>Attachments:</b>  1. Emission Summary 2. MPCA memorandum on total water pressure 3. Table B Fact Sheet 4. Correspondence Summary 5. O&M Plan Outline 6. Fugitive Control Outline	<b>For further information contact:</b>  Permit Engineer: Patrick O'Neill Telephone No.: (612)297-4518
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**Attachment No. 4**  
**Correspondence Summary**

<b>Date:</b>	<b>From:</b>	<b>To:</b>	<b>Subject:</b>
1/17/95	NSPC	MPCA	Original Title V application
8/18/95	MPCA	NSPC	Deficiencies in NSPC's Title V application
9/15/95	MPCA	NSPC	Detailed Letter on Deficiencies in NSPC's Title V application
11/1/95	NSPC	MPCA	Letter detailing Site Visit to NSPC by MPCA staff and permitting issues
2/8/96	MPCA	NSPC	Request for revised permit application
2/22/96	NSPC	MPCA	Revised Part 70 (Title V) application
4/15/96	MPCA	NSPC	Detailed comments on revised Part 70 permit application
4/15/96	MPCA	NSPC	Part 70 Permit application review progress
6/4/96	MPCA	NSPC	Request for schedule to complete revised emission calculations, compliance demonstration methods and ambient air boundary information
6/18/96	NSPC	MPCA	Submittal of Ambient Air boundary proposal
7/31/96	NSPC	MPCA	Response to MPCA's 4/15/96 letter
8/13/96	MPCA	NSPC	Ambient Air boundary
8/15/96	MPCA	NSPC	Clarification of MPCA staff roles
8/19/96	MPCA	NSPC	MPCA's proposal for compliance demonstration methods (CD-01) for NSPC and related issues
9/24/96	NSPC	MPCA	Request for time extension
9/27/96	NSPC	MPCA	Phase one reactivation
10/1/96	NSPC	MPCA	Marked up copy of CD-01 form with NSPC suggested changes
10/3/96	NSPC	MPCA	Response to MPCA's 8/19/96 letter
10/11/96	NSPC	MPCA	Ambient Air Boundary
10/15/96	MPCA	NSPC	Phase one reactivation
10/23/96	MPCA	NSPC	Request for justification of wind erosion emission calculations contained in NSPC 7/31/96 letter
11/3/96	NSPC	MPCA	Compliance demonstration and related issues
11/8/96	NSPC	MPCA	Compliance demonstration issues and PM <sub>10</sub> issues
11/19/96	NSPC	MPCA	Fugitive emissions and HAP review
11/19/96	NSPC	MPCA	Production limits
12/9/96	NSPC	MPCA	Fugitive emissions control plan proposal
12/10/96	NSPC	MPCA	Ambient Air modeling proposal and schedule
12/12/96	NSPC	MPCA	Testing proposal and monitoring issues
12/13/96	NSPC	MPCA	Summary of correspondence and permit discussions
12/17/96	NSPC	MPCA	Operation and Maintenance plan proposal
12/20/96	MPCA	NSPC	Response to NSPC's letters from 11/3/96 to 12/10/96
12/24/96	MPCA	NSPC	Letter acknowledging receipt of correspondence from NSPC
1/6/97	NSPC	MPCA	Revised Summary of correspondence and permit discussions
1/23/97	MPCA	NSPC	Modeling Permit Language proposal

1/23/97	MPCA	NSPC	Ambient Air Boundary
1/24/97	NSPC	MPCA	Schedule
1/27/97	NSPC	MPCA	Summary of 1/23/97 conference call
1/27/97	NSPC	MPCA	Periodic monitoring and production limits
1/27/97	MPCA	NSPC	Summary of 1/14/97 face to face meeting
1/28/97	NSPC	MPCA	Modeling Permit Language proposal
1/30/97	MPCA	NSPC	Fugitive Dust and Operation & Maintenance Plans
2/4/97	MPCA	NSPC	Summary of 1/30/97 face to face meeting including resolution of Modeling Permit Language
2/12/97	NSPC	MPCA	Monitoring equipment, parameters and frequencies
2/13/97	MPCA	NSPC	Comments on NSPC modeling protocol
2/14/97	NSPC	MPCA	Summary of 2/6/97 conference call
2/28/97	MPCA	NSPC	Draft Permit and cover letter detailing some issues
3/4/97	NSPC	MPCA	Submittal of Air dispersion modeling Protocol Revision 1
3/5/97	NSPC	MPCA	NSPC comments on draft permit
3/13/97	MPCA	NSPC	Approval of Air Dispersion Modeling Protocol with clarifications and refinements
3/26/97	NSPC	MPCA	NSPC's additional comments on the draft permit
4/4/97	NSPC	MPCA	Information on NSPC ownership
4/9/97	MPCA	NSPC	Response to NSPC 3/26/97 letter on draft permit
4/14/97	MPCA	NSPC	Insignificant activities
4/25/97	MPCA	NSPC	Revised Draft Permit
5/8/97	NSPC	MPCA	Fax of suggested changes to draft permit
5/14/97	NSPC	MPCA	Certified CD-01 forms
5/14/97	MPCA	NSPC	Application technical completeness letter

**Note: Correspondence from NSPC may appear on NSPC letterhead or on the letterhead of their consultants Synertech and Barr Engineering.**

**Attachment No. 3**  
**Table B One Time Submittals Fact Sheet**

What to Send	When to Send	Portion of Facility Affected
<p><b>O&amp;M Plan:</b>  The Permittee shall provide an O&amp;M plan for review and approval by the Commissioner. The O&amp;M plan shall identify all air pollution control equipment, a preventative maintenance program for that equipment, description of corrective actions to be taken in the event of a malfunction or breakdown, description of the employee training program, and the records kept to demonstrate plan implementation. The Commissioner may require additions or changes to the O&amp;M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.</p>	<p>The O&amp;M plan is due 120 days after permit issuance.</p>	<p>Total Facility</p>
<p><b>O&amp;M Plan revision:</b>  The Permittee shall revise the O&amp;M plan to include the normal operating ranges for all pollution control equipment monitoring devices for CE001 - CE018, CE020, CE022, CE024, CE030 - CE032, and CE034 - CE036. The Commissioner may require additions or changes to the O&amp;M plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.</p>	<p>O&amp;M plan revision is due 365 days after permit issuance.</p>	<p>Total Facility</p>
<p><b>O&amp;M Plan Revision upon Resuming Operation of idled Phase one units:</b>  The Permittee shall revise the O&amp;M plan to include the phase one emission units and associated air pollution control equipment after resuming operation of any phase one equipment. The idled phase one associated air pollution control equipment is CE019, CE021, CE023, CE027 - CE029 and CE033. Revision of the O&amp;M plan shall include the normal operating ranges for all pollution control equipment monitoring devices. The revisions to the O&amp;M plan is due 210 days after resuming operation.</p>	<p>The revisions to the O&amp;M plan is due 210 days after resuming operation.</p>	<p>Total Facility</p>



<b>Fugitive Control Plan:</b> The plan shall identify all fugitive emission sources, primary and contingent control measures and practices, and records kept. The plan will include a statement of objectives, fugitive emission sources, operating and control measures, dust suppressant application description, corrective actions, training, and records. The Commissioner may require additions or changes to the Fugitive Emission Control Plan when granting approval. The Permittee will be given an opportunity to comment on any required additions or changes to the plan before the Commissioner grants approval of the plan.	Fugitive Control Plan due 90 days after permit issuance	Total Facility
<b>Computer Dispersion Modeling Results for non-idled sources:</b> Refined modeling of fugitive sources and all non-idled units shall be conducted if the Initial Dispersion Modeling results do not demonstrate attainment with the NAAQS and MAAQS.	Computer Dispersion Modeling Results due before 1/1/98 (if needed).	Total Facility
<b>Compliance Plan for non-idled emission units:</b> Refined modeling results for all non idled emission units and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling.	Compliance Plan due 30 days after submitting the Computer dispersion modeling results for the non-idled emission units.	Total Facility
<b>Computer Dispersion Modeling Protocol for Total facility initial modeling:</b> Total facility initial modeling of all phase one emission units, phase two emission units, and fugitive sources. The Permittee shall submit a revised modeling protocol based on the modeling protocol that was approved on March 13, 1997, by the MPCA and revised to include the idled phase one emission units. Any changes to the protocol that were approved by the MPCA and/or EPA in writing after March 13, 1997, shall also be incorporated	Computer Dispersion Modeling Protocol due 90 days before Resuming Operation.	Total Facility
<b>Total facility initial modeling results:</b> Total facility initial modeling results of all phase one emission units, phase two emission units, and fugitive sources shall be submitted prior to resuming operation of idled phase one emission units. The Total Facility Computer Dispersion Modeling Results: due 60 days before Resuming Operation.	Total Facility Computer Dispersion Modeling Results due 60 days before Resuming Operation	Total Facility

<b>Compliance Plan for total facility:</b> Total facility modeling results of all phase one emission units, phase two emission units, and fugitive sources that do not demonstrate attainment with the NAAQS and MAAQS will require the Permittee to develop a Compliance Plan. The plan may include an ambient air monitoring network, installation of pollution control equipment, and/or further refinements to the computer modeling. If required, the Compliance Plan: due 30 days before Resuming Operation	Compliance Plan due 30 days before Resuming Operation	Total Facility
<b>Notification:</b> Resuming operation of idled phase one emission units EU019, EU021, EU023, EU025, EU027, EU028, and EU029.	due 15 days after resuming operation	Total Facility
<b>Testing Frequency Plan:</b> Testing Frequency Plan Could be 1, 3, or 5 year intervals depending on the margin of compliance during the initial performance test required by this permit.	due 90 days after initial performance test required by this permit.	GP001, GP002, GP003, GP004, SV002, SV004, SV023, SV025, SV027, SV028, SV029, SV032
<b>Application for Permit Reissuance</b> phase one	due 180 days before expiration of Existing Permit	Total Facility
<b>Initial Performance Test Notification (written)</b>	due 30 days before Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
<b>Initial Performance Test Plan</b>	due 30 days before Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032

<b>Initial Performance Test Report</b>	due 45 days after Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032
<b>Initial Performance Test Report - Microfiche Copy</b>	due 105 days after Initial Performance Test	EU030, GP001, GP002, GP003, GP004, GP005, GP006, SV001, SV002, SV003, SV004, SV023, SV024, SV025, SV026, SV027, SV028, SV029, SV032