

AIR EMISSION PERMIT NO. 00900011- 005

IS ISSUED TO

Verso Paper Co

VERSO PAPER CO - SARTELL MILL

100 East Sartell Street
Sartell, Benton County, MN 56377

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 - Reissuance	12/14/2007

This permit supersedes permit number 00900011-005 and authorizes the permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/Major for NSR

Issue Date: November 13, 2008

Expiration: November 13, 2013

All Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for Brad Moore
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

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

FACILITY DESCRIPTION:

International Paper, Sartell is a thermo-mechanical pulp (TMP) and paper mill. The mill currently manufactures a variety of coated and uncoated paper products. Operations at the mill include wood storage and processing, TMP mill with pulp brightening equipment, paper mill, finishing and shipping facilities, a wastewater treatment system, and a power plant.

TMP includes steam and mechanical refining to produce the pulp. On-site boilers provide steam for the TMP process. The pulp is brightened using water and chemicals before being stored or transferred to the mill's three paper machines. The paper is finished or trimmed and cut to size, prior to shipment to customers.

Emissions from the facility include particulates from coal, lime, and ash handling and/or burning; and Sulfur Dioxide, Nitrogen Oxides, Carbon Monoxide and Hazardous Waste Air Pollutants from the coal and natural gas fired boilers.

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-1**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

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

Subject Item: Total Facility

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: The permittee shall at all times properly operate and maintain the facilities and systems of treatment and control and the appurtenances related to them which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
The facility currently uses ozone-depleting substances as defined in 40 CFR pt. 82. Sections 601-618 of the 1990 Clean Air Act Amendments and 40 CFR pt. 82 may apply to your facility. Read Sections 601-618 and 40 CFR pt. 82 to determine all the requirements that apply to your facility.	40 CFR pt. 82
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
FUGITIVE EMISSIONS CONTROL	hdr
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.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150; Minn. R. 7009.0020
Fugitive Emissions Control Plan: The Permittee shall submit a fugitive emissions control plan within 60 days of the date of permit issuance for review by the Commissioner. The plan shall identify all fugitive emission sources, primary and contingent control measures, and recordkeeping. The control measures included in the plan must include the requirements of Minn. R. 7011.1105. The Permittee shall follow the actions and recordkeeping specified in the control plan. The plan may be amended by the Permittee. All changes to the plan shall be recorded on-site and available for MPCA review.	Minn. R. 7011.0150; Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and recordkeeping specified in the control plan. The plan may be amended by the permittee if the changes are recorded onsite and the plan is available for MPCA review at any time. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150, Minn. R. 7011.1105 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner.	Minn. R. 7011.0150; Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Calibrate all required monitoring equipment annually or at the frequency recommended by the manufacturer (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
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 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)
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. The Permittee shall submit this on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
DETERMINING IF A PROJECT/MODIFICATION IS SUBJECT TO NEW SOURCE REVIEW	hdr
These requirements apply where there is a reasonable possibility (as defined in 40 CFR Section 52.21(r)(6)(vi)) that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test (either by itself or as part of the hybrid test described in Section 52.21(a)(2)(iv)(f)) and found to not be part of a major modification, may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project. Even though a particular modification is not subject to New Source Review, or where there isn't a reasonable possibility that a proposed project could result in a significant emissions increase, a permit amendment, recordkeeping, or notification may still be required under Minn. R. 7007.1150 - 7007.1500.	Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2
Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following: 1. Project description 2. Identification of any emission unit (EU) whose emissions of an NSR pollutant could be affected 3. Pre-change potential emissions of any affected existing EU, and the projected post-change potential emissions of any affected existing or new EU. 4. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the EU could have accommodated during the baseline period, an explanation of why the amounts were excluded, and any creditable contemporaneous increases and decreases that were considered in the determination. The Permittee shall maintain records of this documentation.	Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.1200, subp. 4; Minn. R. 7007.0800, subps. 4 & 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

The Permittee shall monitor the actual emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using the ATPA test, and the potential emissions of any regulated NSR pollutant that could increase as a result of the project and that were analyzed using potential emissions in the hybrid test. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if the hybrid test was used in the analysis) emissions of the regulated pollutant, in tons per year on a calendar year basis, for a period of 5 years following resumption of regular operations after the change, or for a period of 10 years following resumption of regular operations after the change if the project increases the design capacity of or potential to emit of any unit associated with the project.	Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
<p>The Permittee must submit a report to the Agency if the annual summed (actual, plus potential if used in hybrid test) emissions differ from the preconstruction projection and exceed the baseline actual emissions by a significant amount as listed at 40 CFR Section 52.21(b)(23). Such report shall be submitted to the Agency within 60 days after the end of the year in which the exceedances occur. The report shall contain:</p> <p>a. The name and ID number of the facility, and the name and telephone number of the facility contact person</p> <p>b. The annual emissions (actual, plus potential if any part of the project was analyzed using the hybrid test) for each pollutant for which the preconstruction projection and significant emissions increase are exceeded.</p> <p>c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection.</p>	Title I Condition: 40 CFR Section 52.21(r)(6); Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 & 5
PENDING NESHAPS	hdr
Comply with "Industrial, Commercial and Institutional Boiler" category standards as it applies, pending promulgation.	40 CFR 63, subp. DDDDD
PULP AND PAPER PRODUCTION NESHAP	hdr
The provisions of 40 CFR 63.440 apply to the owner and operator of processes that produce pulp, paper, or paperboard; that are located at a plant site that is a major source. For mechanical pulping processes using wood, the affected source is the total of all HAP emission points in the bleaching system. Because the facility does not have a chlorine bleaching system, the bleaching system is exempt from the requirements of 40 CFR 63.445, but the general provisions of 40 CFR Part 63, subpart A do apply as per 40 CFR 63.440(g).	40 CFR 63, subp. S
NONROAD ENGINES	hdr
Each nonroad engine must be certified under and conform with all applicable requirements of 40 CFR Part 1068, 40 Part CFR 1048 and 40 CFR Part 90.	Minn. R. 7007.0800, subp. 2
<p>Permittee shall keep records for each nonroad engine that will include;</p> <p>1.) Date that the nonroad engine is brought on site.</p> <p>2.) Date that the nonroad engine is taken off site.</p> <p>3.) Identification number.</p> <p>4.) Rated capacity of the nonroad engine.</p> <p>5.) Which nonroad provision that the nonroad engine is certified under.</p> <p>6.) Rental company.</p> <p>7.) Function of the nonroad engine.</p>	Minn. R. 7007.0800, subp. 4 and 5
The permittee shall not have nonroad engines onsite for more then 12 consecutive months. Any engine, or engines, that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period.	40 CFR 1068.30(2)(iii)
For a nonroad engine that is excluded from any requirements of 40 CFR Part 1068 because it is a stationary engine, you may not move it or install it in any mobile equipment, except as allowed by the provisions of 40 CFR Part 1068. You may not circumvent or attempt to circumvent the residence-time requirements of paragraph (2)(iii) of the nonroad engine definition in chapter 1068.30.	40 CFR 1068.101 (B)(3)

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 001 Industrial Process Equipment

Associated Items:

CE 008 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 009 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 019 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 021 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 025 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 026 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 009 B & W Boiler Ash Handling System

EU 010 B & W Boiler Ash Silo

EU 011 Rail Lime Receiving

EU 012 Lime Silo

EU 017 North Power Plant Ash Silo

EU 020 Starch Silos

EU 026 Chip Cyclones

What to do	Why to do it
LIMITS (also copied to CE level)	hdr
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
CONTROL REQUIREMENTS (see CE 008, CE 009, CE 011, CE 012, CE 017, CE 019, CE 021, CE 026 for specific control equipment operating requirements)	hdr
COMPLIANCE ASSURANCE MONITORING (see GP 003 and GP 004)	hdr

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 002 Coal Handling Units**Associated Items:** CE 001 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 005 Coal transfer

EU 007 Coal Crusher

EU 008 B&W Coal Bunker

What to do	Why to do it
LIMITS (also copied to CE level)	hdr
Opacity: less than or equal to 20 percent opacity .	40 CFR 60.252(c); Minn. R. 7011.1150
During freezing temperatures, the Permittee shall not be required to apply water or dust suppressants.	Minn. R. 7011.1120
The Permittee shall not conduct any nonessential coal handling operations that are not shielded from the wind or enclosed in a building when steady wind speeds exceed 30 miles per hour as determined at the nearest official station of the United States Weather Bureau or by wind speed instruments on or adjacent to the site.	Minn. R. 7011.1125
The Permittee shall not use surface hardening agents, wetting or chemical agents, foam agents, and oils that may cause ground water or surface water contamination in violation of any applicable water pollution law.	Minn. R. 7011.1140
CONTROL REQUIREMENTS (see CE 001, CE 002, CE 003 and CE 004 for specific control equipment operating requirements)	hdr
COMPLIANCE ASSURANCE MONITORING (see GP 004)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 003 Fabric Filters subject to CAM without Pressure drop**Associated Items:** CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 011 Rail Lime Receiving

EU 012 Lime Silo

What to do	Why to do it
COMPLIANCE ASSURANCE MONITORING (each requirement applies to each Fabric Filter separately)	hdr
The Permittee shall operate and maintain each fabric filter at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Daily Inspections: The Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
Quarterly Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall conduct an inspection to ensure that the controls operate properly and that any alarms are functional. The Permittee shall maintain a record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspections: At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall conduct a thorough mechanical maintenance inspection of the fabric filter. The Permittee shall maintain a record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping: The Permittee shall record the time and date of each visible emission inspection, and whether or not any visible emissions were observed. Any visible emissions are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a. If the emission unit is not operating, the Permittee shall record that the process is not operating.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 004 Fabric Filters subject to CAM with Pressure drop**Associated Items:** CE 021 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 026 Chip Cyclones

What to do	Why to do it
COMPLIANCE ASSURANCE MONITORING (each requirement applies to each Fabric Filter separately)	hdr
The Permittee shall operate and maintain each fabric filter at all times that any emission unit controlled by the fabric filter is in operation. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Daily Inspections: The Permittee shall do the following, once every 24 hours: 1). Inspect the fabric filter stack for any visible emissions during daylight hours, except during inclement weather. 2). Read and record the pressure drop across the fabric filter.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
Quarterly Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall conduct an inspection to ensure that the controls operate properly and that any alarms are functional. The Permittee shall maintain a record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspections: At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall conduct a thorough mechanical maintenance inspection of the fabric filter. The Permittee shall maintain a record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping of Visible Emissions and Pressure Drop: The Permittee shall record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; or - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate the pressure gauge at least once every calendar year and shall maintain a written record of any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

40 CFR Section 64.9(b); Minn. R. 7017.0200

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 006 Venturi Scrubbers subject to CAM**Associated Items:** CE 006 Venturi Scrubber

CE 014 Venturi Scrubber

EU 006 B & W Boiler

EU 018 Bros Boiler

What to do	Why to do it
COMPLIANCE ASSURANCE MONITORING (each requirement applies to each Venturi Scrubber separately)	hdr
The Permittee shall operate and maintain the scrubber at any time that the process equipment controlled by the scrubber is in operation. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the scrubber in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available for use by staff and MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Daily Inspections: The Permittee shall do the following, once every 24 hours: 1). Read and record the scrubber liquid flow rate. 2). Read and record the gas pressure drop across the scrubber.	Minn. R. 7007.0800, subps. 2 and 14; 40 CFR Section 64.3; Minn. R. 7017.0200
Recordkeeping of Pressure Drop, Water Flow Rate: The Permittee shall record the time and date of each pressure drop reading, water flow rate reading, and whether or not the observed value was within the range specified in this permit. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Minn. R. 7007.0800, subps. 2 and 14; 40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded water flow rate is outside the required operating range; or - the recorded pressure drop is outside the required operating range; or - the scrubber or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop and/or water flow rate to within the permitted range, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the scrubber. The Permittee shall keep a record of the type and date of any corrective action taken for the filter.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop, water flow rate as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored scrubber is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate the gauges at least once every calendar year and shall maintain a written record of any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 007 Fabric Filter not subject to CAM without Pressure drop**Associated Items:** CE 009 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 025 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 010 B & W Boiler Ash Silo

EU 021 SCA Paper Machines

What to do	Why to do it
MONITORING AND RECORDKEEPING (each requirement applies to piece of control equipment separately)	hdr
Visible Emissions: The Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours.	Minn. R. 7011.0080
Recordkeeping of Visible Emissions. The Permittee shall record the time and date of each visible emission inspection, whether or not any visible emissions were observed, and whether or not inclement weather prevented observation.	Minn. R. 7011.0080
The control equipment is considered listed control equipment under Minn. R. 7011.0060 to 7011.0080. The Permittee shall operate and maintain the fabric filter at all times that any process equipment controlled by the fabric filter is operating. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7011.0075, subp. 1
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall maintain each piece of control equipment according to the manufacturer's specification, shall conduct inspections, and maintain documentation of those actions as required by Minn. R. 7011.0075, subp. 2(A) to 2(I).	Minn. R. 7011.0075, subp. 2
LIMITS (See CE009)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: GP 008 Fabric Filter not subject to CAM with Pressure drop**Associated Items:** CE 001 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 008 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 019 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 026 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 005 Coal transfer

EU 007 Coal Crusher

EU 008 B&W Coal Bunker

EU 009 B & W Boiler Ash Handling System

EU 017 North Power Plant Ash Silo

EU 020 Starch Silos

What to do	Why to do it
MONITORING AND RECORDKEEPING (each requirement applies to piece of control equipment separately)	hdr
The Permittee shall check the fabric filter stack for any visible emissions once each day of operation during daylight hours. The Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Minn. R. 7011.0080
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection and pressure drop reading, and whether or not any visible emissions were observed, and whether or not the observed pressure drop was within the range specified in this permit.	Minn. R. 7011.0080
The control equipment is considered listed control equipment under Minn. R. 7011.0060 to 7011.0080. The Permittee shall operate and maintain the fabric filter at all times that any process equipment controlled by the fabric filter is operating. The Permittee shall document periods of non-operation of the control equipment.	Minn. R. 7011.0075, subp. 1
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7011.0075, subp. 3
The Permittee shall maintain each piece of control equipment according to the manufacturer's specification, shall conduct inspections, and maintain documentation of those actions as required by Minn. R. 7011.0075, subp. 2(A) to 2(I).	Minn. R. 7011.0075, subp. 2
LIMITS (See CE001, CE002, CE003, CE004, CE008, CE017, CE019, CE021, CE 025)	hdr

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 001 Wood Processing Operations**Associated Items:** SV 001 Hardwood log washer hood

SV 002 Hardwood log washer hood

SV 003 Hardwood log washer hood

SV 004 Softwood log washer hood

SV 005 Softwood log washer hood

SV 006 Woodroom exhaust fan

SV 007 Woodroom exhaust fan

SV 008 Woodroom exhaust fan

SV 009 Woodroom exhaust fan

SV 010 Woodroom exhaust fan

SV 011 Woodroom exhaust fan

SV 012 Woodroom exhaust fan

SV 013 Woodroom exhaust fan

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. (This is met because the potential to emit from this unit is 0.15 lbs/hr or 0.0022 grains/dry standard cubic meter)	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 006 B & W Boiler**Associated Items:** CE 005 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones

CE 006 Venturi Scrubber

GP 006 Venturi Scrubbers subject to CAM

MR 004 B&W Boiler Water Flow

MR 005 B&W Boiler Pressure Drop

MR 010 B&W Boiler - SO₂MR 011 B&W Boiler - NO_xMR 012 B&W Boiler - CO₂

SV 017 B&W boiler

What to do	Why to do it
GENERAL CONDITIONS	hdr
Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971	40 CFR Part 60, Subpart D; Minn. R. 7011.0555
The General Provisions 40 CFR Part 60 Subpart A, 60.1 to 60.19 apply to EU006	40 CFR Part 60 Subpart A
OPERATIONAL REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.10 lbs/million Btu heat input	40 CFR Part 60.42(a)(1)
Sulfur Dioxide: less than or equal to 1.2 lbs/million Btu heat input	40 CFR Part 60.43(a)(2)
Nitrogen Oxides: less than or equal to 0.70 lbs/million Btu heat input	40 CFR Part 60.44(a)(3)
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 27 percent opacity.	40 CFR Part 60.42(a)(2)
The opacity standards set forth in 40 CFR, Part 60.11(c) shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.	40 CFR Part 60.11(c)
Mercury: less than or equal to 7.1 pounds of mercury per 24-hour period.	40 CFR 61.52(b)
The Permittee is authorized to burn as fuel in EU006 subbituminous coal, bituminous coal, natural gas, wood residue, on-site generated sludge, on-site generated petroleum derived waste oil and petroleum distillate solvents, and tire derived fuel (TDF). The firing of TDF is limited to a maximum of 8% of the total heat input from TDF, wood waste, and coal combined. When burning TDF, the Permittee shall record and maintain records of the amount of each fuel combusted each day. Calculate, record and maintain records of the percent of TDF compared to the total heat input from TDF, wood waste, and coal.	Minn. R. 7007.0800, subp. 2, and MPCA Letter dated November 21, 1990
On-site generated petroleum derived waste oil and petroleum distillate solvents must meet the following specifications: Minimum gross heating value: 125,000 Btu/gal Minimum flash point: 120 Degrees F Maximum ash: 1.0 % by weight Maximum lead: 0.4 % by weight Maximum sulfur: 1.8 % by weight Maximum PCB: 50 ppm by weight Maximum elemental halogens, excluding inorganic halogens: 0.5 % by weight pH: 4.0 - 10.0	Minn. R. 7007.0800, subp. 2
PERFORMANCE TESTING	hdr
Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The Permittee shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests. Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.	40 CFR Part 60.8(c)

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

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

CONTINUOUS EMISSION MONITORING SYSTEMS (CEMS) Requirements (Additional requirements are located under MR 010, MR 011, MR 012 and in Table B)	hdr
The Permittee shall install, calibrate, maintain, and operate continuous monitoring systems for measuring the sulfur dioxide emissions, nitrogen oxides emissions, and either oxygen or carbon dioxide.	40 CFR Part 60.45(a)
As an alternative to operating a COMS, the Permittee shall monitor and record scrubber pressure drop and scrubber liquid flow rate. Maintain and calibrate the equipment according to manufacturer's recommendations and instructions and as described in 40 CFR 60.13(b).	40 CFR Part 60.13(i)(1)
Conduct daily fuel sampling and analysis to determine compliance with SO ₂ limit, beginning within 2 operating days whenever the SO ₂ monitor is out of service or out of calibration. Collect separate coal samples in accordance with an approved ASTM method. Wood waste and sludge % sulfur content shall be based on historic testing values of .04% and .011% respectively. Calculate SO ₂ emissions using estimated % removal based on available performance indicators. Submit emissions calculations based on fuel sampling in the quarterly report.	Minn. R. 7007.0800, subp.4
Conduct a sampling and analysis program to demonstrate that petroleum derived waste oil and petroleum distillate solvents to be burned as fuel in EU006 meet the specifications listed above. For quantities of petroleum derived waste oil and petroleum distillate solvents that total less than 10,000 gallons per calendar quarter, a composite sample may be taken throughout the year and analyzed at the end of the calendar year. Total usage in gallons burned shall be reported on the quarterly report.	Minn. R. 7007.0800, subp.4
CEMS Daily Calibration Drift (CD) Test: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) gas concentrations at least once daily. The CEMS shall be adjusted whenever the CD exceeds twice the specification of 40 CFR pt. 60, Appendix B. 40 CFR pt. 60, Appendix F, shall be used to determine out-of-control periods for CEMS. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 3
Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 12/02/1999. Conduct CGA at least 3 months apart but not greater than 8 months apart. If a RATA is performed during the calendar half-year the CGA is not required. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 1/02/2000. If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months. Follow the procedures in 40 CFR pt. 60, Appendix B & F.	Minn. R. 7017.1170, subp. 5
RATA Notification: due 30 days before CEMS RATA.	Minn. R. 7017.1180, subp. 2
QA Plan: Develop and implement a written quality assurance plan that covers each CEMS. The plan shall be on site and available for inspection within 30 days after monitor certification. The plan shall contain all of the information required by 40CFR 60, App. F, section 3.	40 CFR Section 60.13(a); 40 CFR pt. 60, Appendix F; Minn. R. 7017.1170, subp. 2
RECORDKEEPING	hdr
Recordkeeping: The owner or operator must retain records of all CEMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7017.1130
The Permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Part 60.7(b)
Compliance Demonstration: The Permittee shall observe and record once per operating day the multiclone pressure drop, scrubber pressure drop, and scrubber liquid flow rate. Operate and maintain control devices as per Minn. R. 7011.0070 to 7011.0080.	40 CFR Part 60.42(a)(1) and (2)
MERCURY TRIGGER LEVEL	hdr
Mercury: less than or equal to 0.5 ppm average sludge concentration using a 12 month rolling average. This is a state-only requirement and is not enforceable by the EPA Administrator, nor subject to the citizen suit provisions of section 304 of the Clean Air Act, 42 U.S.C. section 7604.	Minn. R. 7007.0800, subp. 2
If the mercury trigger level is exceeded, the permittee shall retest within 30-days of receipt of results to check for false/positive results. If exceedance of the trigger level is confirmed in the retest, the permittee shall submit and begin implementing a mercury reduction plan within 60 days of the confirmation of the exceedance. The plan shall include the reasons for increased mercury loading and the pollution prevention and other relevant mercury reduction activities to minimize the effects of the above. This is a state-only requirement and is not enforceable by the EPA Administrator, nor subject to the citizen suit provisions of section 304 of the Clean Air Act, 42 U.S.C. section 7604.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Verso Paper Co - Sartell Mill
Permit Number: 00900011 - 005

CONTROL REQUIREMENTS (see Subject Item CE 005 and CE 006 for specific control equipment operating requirements)	hdr
Initial Performance Test: due 180 days after Permit Issuance to measure total particulate matter.	Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-17**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 015 Wickes Boiler**Associated Items:** SV 023 Bros and Wickes boilers

What to do	Why to do it
LIMITS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input . The Potential to emit with allowable fuel type is .0076 lbs/million Btu.	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Sulfur Dioxide: less than or equal to 4.0 lbs/million Btu heat input when burning solid fuels.	Minn. R. 7011.0510, subp. 1
OPERATIONAL REQUIREMENTS	hdr
When burning fuels other then natural gas, observe and record once per operating day the pressure drop on the cyclone CE015. Operate and maintain control devices as per Minn. R. 7011.0070 to 0080.	Minn. R. 7011.0510
When burning fuels other then natural gas in EU015, calculate SO2 emissions on a 30-day rolling average ausing estimated % removal based on available performance indicators and fuel sulfur analysis provided by the fuel supplier. Submit emissions calculations based on fuel sampling in the quaterly report.	Minn. R. 7011.0510
The Permittee is authorized to burn only natural gas in EU015, or other fuels authorized by the MPCA. The Permittee is authorized to burn coal in EU015 after conducting a performance test demonstrating compliance with applicable permit limits. coal firing shall be limited to the rate fired in the performance test. The permittee shall provide a thirty-day written notice to the MPCA prior to conduction a performance test.	Minn. R. 7007.0800, subp. 2
MULTIPLE CYCLONE (CE 015)	hdr
Monitoring Equipment: The Permittee shall maintain the necessary monitoring equipment for measuring and recording pressure drop on the cyclone. The monitoring equipment must be installed, in use, and properly maintained when the cyclone is in operation.	Minn. R. 7007.0800, subp. 4
Monitor and record the pressure drop for the cyclone at least once every 24 hours when the cyclone is in operation.	Minn. R. 7007.0800, subp. 2 and 14
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading, and whether or not the pressure drop was within the range specified in the O & M plan.	Minn. R. 7011.0715
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the operating range; or - the cyclone is found during the inspections to need repair. Corrective actions shall return the pressure drop to within the recommended range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the cyclone. The Permittee shall keep a record of the type and date of any corrective action taken for the cyclone.	Minn. R. 7007.0800, subp. 4, 5, and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-18**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 016 North Power Plant Ash Handling System**Associated Items:** CE 016 Dust Suppression by Water Spray

SV 024 Bros and Wickes ash collector

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
Water spray shall be used to control particulate emissions whenever the ash handling system is in operation.	Minn. R. 7011.0715
The permittee shall keep records of when the ash handling system is in operation and whether or not the water spray system is operating during this period.	Minn. R. 7007.0800, Subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-19**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 017 North Power Plant Ash Silo**Associated Items:** CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

GP 001 Industrial Process Equipment

GP 008 Fabric Filter not subject to CAM with Pressure drop

SV 025 Bros and Wickes ash silo

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)
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0710, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-20**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 018 Bros Boiler**Associated Items:** CE 013 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers

CE 014 Venturi Scrubber

GP 006 Venturi Scrubbers subject to CAM

MR 007 Bros Boiler Water Flow

MR 008 Bros Boiler Pressure Drop

SV 023 Bros and Wickes boilers

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Sulfur Dioxide: less than or equal to 1.2 lbs/million Btu heat input	Minn. R. 7007.0800 subp. 2
The permittee is authorized to burn subbituminous and bituminous coal in EU 018.	Minn. R. 7007.0800, subp. 2
MONITORING REQUIREMENTS	hdr
Calculate SO2 emissions on a 30-day rolling average using estimated percent removal based on available performance indicators and fuel sulfur analysis provided by the coal supplier. Submit emissions calculations based on fuel sampling in the quarterly report.	Minn. R. 7011.0510
CONTROL REQUIREMENTS (see Subject Item CE 013 and CE 014 for specific control equipment operating requirements)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-21**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 019 Package Boiler**Associated Items:** SV 026 Package boiler

What to do	Why to do it
The Permittee shall submit notification of the date of construction or reconstruction, anticipated startup, and actual startup, as provided by 40 CFR 60.7. This notification shall include the design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.	40 CFR 60.48c(a)
The Permittee shall record and maintain records of the amount of fuel combusted each day.	40 CFR 60.48c(g)
The Permittee is authorized to burn only natural gas in EU019 during outages of any boiler (EU006, EU015, EU018) including the time necessary to take the boilers off-line and bring them back into service.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-22**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 021 SCA Paper Machines**Associated Items:** CE 025 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

GP 007 Fabric Filter not subject to CAM without Pressure drop

SV 028 SCA wet end exhaust fan

SV 029 #1 PM dryers

SV 030 SCA supercalendars

SV 031 SCA supercalendars

SV 032 #1 PM dryers

SV 033 SCA wet end exhaust fan

SV 034 #2 PM dryers

SV 035 #2 PM dryers

SV 036 SCA supercalendars

SV 037 SCA supercalendars

SV 038 SCA exhaust fan

SV 039 SCA exhaust fan

SV 040 SCA exhaust fan

SV 041 SCA exhaust fan

SV 042 SCA exhaust fan

SV 043 SCA supers exhaust fan

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)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
The Permittee shall administer good operating and maintenance practices to minimize particulate matter emissions from the paper machine trim system.	Minn. R. 7011.0715, Subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-23**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 024 Paper Machine 3

Associated Items: SV 044 #3 PM primary deculator
SV 045 #3 PM first coater
SV 046 #3 PM dryer #5
SV 047 #3 PM second coater
SV 048 #3 PM dryer #6
SV 049 #3 PM mist elimination #1
SV 050 #3 PM saveall
SV 051 #3 PM vacuum pumps
SV 052 #3 PM vacuum pumps
SV 053 #3 PM main dryers
SV 054 #3 PM main dryers
SV 055 #3 PM main dryers
SV 056 #3 PM mist elimination #2
SV 057 #3 PM top wire cleaning
SV 058 #3 PM skimmer separator
SV 059 #3 PM gap former vac pump
SV 060 #3 PM bottom wire cleaning
SV 061 #3 PM exhaust fan
SV 062 #3 PM exhaust fan
SV 063 #3 PM exhaust fan
SV 064 #3 PM exhaust fan
SV 065 #3 PM exhaust fan
SV 066 #3 PM exhaust fan
SV 067 #3 PM exhaust fan
SV 068 #3 PM exhaust fan
SV 069 #3 PM exhaust fan
SV 070 #3 PM exhaust fan
SV 071 #3 PM exhaust fan
SV 072 #3 PM exhaust fan
SV 073 #3 PM tank farm exhaust fan
SV 074 #3 PM tank farm exhaust fan
SV 075 #3 PM tank farm exhaust fan
SV 076 #3 PM tank farm exhaust fan
SV 077 #3 PM supers exhaust fan
SV 078 #3 PM supers exhaust fan
SV 079 #3 PM supers exhaust fan
SV 080 #3 PM sal. winder exhaust fan
SV 081 #3 PM sal. winder exhaust fan

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-24**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

What to do	Why to do it
Production: less than or equal to 800 tons/day using 12-month Rolling Average (machine finished tons/day). Record the paper produced daily. Calculate and record the monthly average and the 12-month rolling average by the 10th day of the month for the previous month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption: Engineering calculations were provided in support of Amendment No. 2 to Permit No. 1004A-84-OT-1 which show that emissions from the boilers will not increase as a result of the No. 3 Paper Machine modification due to the steam savings projects undertaken at the same time. To demonstrate that these steam savings projects are operating at the efficiencies presented in the application the Permittee shall:</p> <p>i. Record the dryer steam use continuously (which consists of the main dryers, thermocompressor, overly dryers). Annually calculate the steam used by the No. 3 Paper Machine Dryers. The steam calculations shall be completed within one month after the completion of each 12-month period.</p> <p>Continued below:</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption, Continued:</p> <p>ii. Within 30 days after the completion of the annual steam consumption calculations for the No. 3 Paper Machine Dryers, submit a report to the MPCA that compares the annual dryer steam consumption and the annual heat recovered at the TMP Heat Exchanger to the calculations presented in the PSD Avoidance application. If the calculated annual No. 3 Paper Machine Dryer steam usage is greater than (1.98 x 10 to the 6th pounds per day x number of operating days per year for the No. 3 Paper Machine) pounds per year, as a part of the report the permittee must: determine if there is excess heat recovered during the previous 12 months at the TMP heat exchanger to account for this.</p> <p>Continued below:</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
<p>Steam Consumption, Continued:</p> <p>Excess heat recovered at the TMP heat exchanger would be any heat recovered that is greater than (203 MMBtu per day x number of operating days per year for the No. 3 Paper Machine) MMBtu per year. If there is not excess heat recovered at the TMP heat exchanger to account for the dryer usage, the Permittee shall submit an explanation within 15 days from the submittal of the Annual Energy Audit.</p>	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas from the IR Dryer 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. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent opacity from the IR Dryer except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0610, subp. 1(A)(2)
The Permittee is authorized to burn only natural gas in the IR Dryer of EU024.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-25**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 027 TMP Refining**Associated Items:** CE 024 Regenerative Thermal Oxidizer

CE 027 Thermal Oxidizer

MR 009 TMP Refining

SV 083 TMP refining

SV 105

What to do	Why to do it
LIMITS	hdr
TMP Heat Exchanger Energy Recovery: The heat recovered must be greater than (203 MMBtu per day x the number of operating days per year for the No. 3 Paper Machine) MMBtu per year based on a 12-month rolling sum calculated monthly. The Permittee shall monitor the water flow rate and the water temperature rise across the heat exchanger daily while the TMP area is in operation. Once each day during operation, calculate the heat transferred from the TMP high grade heat recovery stacks to the water in units of MMBtu per day.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
Maintain an outlet emission rate for Volatile Organic Compounds: less than or equal to 0.10 lbs/ton of product (dry basis) using 12-month Rolling Average	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Volatile Organic Compounds: greater than or equal to 85 percent control efficiency	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21; Minn. R. 7007.0800, subp. 2 and 14
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
The Permittee is authorized to burn only natural gas in CE 027.	Minn. R. 7007.0800, subp. 2
The Permittee is authorized to burn only natural gas in CE 024.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Based on the results of the most recent performance test, calculate and record the monthly average and 12-month rolling average and the emission rate by the 10th day of the month for the previous month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings and calculated three hour rolling average temperatures for the combustion chamber.	Title I Condition: Monitoring for Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4 and 5
MONITORING	hdr
Daily Monitoring: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
PERFORMANCE TESTING	hdr
Performance Test: due before end of each 60 months starting 09/14/2005 for VOC emissions and destruction efficiency.	Minn. R. 7017.2020, subp. 1
Control Equipment requirements (see CE024 and CE027)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-26**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 028 TMP Screening and Cleaning

Associated Items:

- SV 084 TMP chip washers
- SV 085 TMP line 1 cleaners
- SV 086 TMP line 1 cleaners
- SV 087 TMP disc thickeners
- SV 088 TMP line 2 cleaners
- SV 089 TMP line 2 cleaners
- SV 090 TMP rejects cleaners
- SV 091 TMP rejects cleaners
- SV 092 TMP low grade heat recovery
- SV 093 TMP exhaust fan
- SV 094 TMP exhaust fan
- SV 095 TMP exhaust fan
- SV 096 TMP exhaust fan
- SV 097 TMP exhaust fan
- SV 098 TMP exhaust fan
- SV 099 TMP exhaust fan
- SV 100 TMP exhaust fan
- SV 101 TMP exhaust fan
- SV 102 TMP exhaust fan
- SV 103 TMP exhaust fan

What to do	Why to do it
Production: less than or equal to 468 tons/day (Air Dried Tons of Pulp Per Day [ADTP/Day]) from both thermomechanical pulping (TMP) lines averaged over a calendar month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21
The Permittee shall keep daily records of pulp production in air dried tons of pulp from the combination of both TMP lines. By the 10th day of each calendar month, the Permittee shall calculate and record the average daily TMP production from both lines combined for the previous calendar month.	Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-27**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 032 Welding Generator**Associated Items:** SV 104 Portable welding generator

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.50 lbs/million Btu heat input	Minn. R. 7011.2300, subp. 2
Permitted Fuel Type: Gasoline. Note that gasoline has a AP-42 emission factor of 0.084 lbs/MMBtu which is well under the limit of 0.50 lbs/MMBtu.	Minn. R. 7007.0800, subp. 2
Recordkeeping: The Permittee shall maintain records of the hours of operation of the engine and keep them on-site.	Minn. R. 7007.0800, subp. 4 & 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-28**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: EU 034 Diesel Pump Engine

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300, subp. 2
Permitted Fuel Type: Distillate fuel oil only with a maximum sulfur content of 0.49% by weight. Note that fuel oil with a sulfur content of 0.49% by weight will produce emissions of 0.5 lb. SO ₂ per mmBtu heat input.	Minn. R. 7007.0800, subp. 2
Recordkeeping: The Permittee shall maintain records of the hours of operation of the engine and keep them on-site.	Minn. R. 7007.0800, subp. 4 & 5
Fuel Supplier Certification: The Permittee shall obtain and maintain a fuel supplier certification for each shipment of distillate fuel oil, certifying that the sulfur content does not exceed 0.49% by weight.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-29**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 001 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 005 Coal transfer

GP 002 Coal Handling Units

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity .	40 CFR 60.252(c); Minn. R. 7011.1150
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to .5 inches of water column and less than or equal to 6 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-30**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 005 Coal transfer

GP 002 Coal Handling Units

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity .	40 CFR 60.252(c); Minn. R. 7011.1150
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to .5 inches of water column and less than or equal to 6 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-31**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 003 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 007 Coal Crusher

GP 002 Coal Handling Units

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity .	40 CFR 60.252(c); Minn. R. 7011.1150
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to .5 inches of water column and less than or equal to 6 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-32**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 004 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 008 B&W Coal Bunker

GP 002 Coal Handling Units

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity .	40 CFR 60.252(c); Minn. R. 7011.1150
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to .5 inches of water column and less than or equal to 6 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-33**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 005 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones**Associated Items:** EU 006 B & W Boiler

What to do	Why to do it
LIMITS	hdr
Pressure Drop: greater than or equal to 3.0 inches of water column using 3-hour Rolling Average, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp.4
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 65.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 75.0	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING	hdr
The Permittee shall operate and maintain the cyclone (CE 005) at any time that the process equipment controlled by the cyclone (EU 006) is in operation. The Permittee shall document periods of non-operation of the control equipment.	40 CFR Section 64.3; Minn. R. 7017.0200
The Permittee shall operate and maintain the multiclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall maintain and operate a pressure drop monitoring device that continuously indicates and records the pressure drop across the multiclone. The recording device shall also calculate the three-hour rolling average pressure drop.	40 CFR Section 64.3(b)(4)(ii); Minn. R. 7017.0200
The Permittee shall maintain a continuous hard copy readout or computer disk file of the pressure drop readings and calculated three hour rolling average pressure drop. Recorded values outside the range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	40 CFR Section 64.9(b); Minn. R. 7017.0200
Annual Calibration: The Permittee shall calibrate the pressure drop monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the multiclone or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the multiclone. The Permittee shall keep a record of the type and date of any corrective action taken for each control device.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored multiclone is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Verso Paper Co - Sartell Mill
Permit Number: 00900011 - 005

The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200
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TABLE A: LIMITS AND OTHER REQUIREMENTS**A-35**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 006 Venturi Scrubber**Associated Items:** EU 006 B & W Boiler

GP 006 Venturi Scrubbers subject to CAM

What to do	Why to do it
LIMITS	hdr
Water flow rate: greater than or equal to 2200 gallons/minute using 3-hour Average , unless a new value is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp. 4
Pressure Drop: greater than or equal to 13 inches of water column using 3-hour Rolling Average , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp. 4
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 85.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 85.0	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING (see GP 006)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-36**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 008 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 009 B & W Boiler Ash Handling System

GP 001 Industrial Process Equipment

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 11 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-37**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 009 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 010 B & W Boiler Ash Silo

GP 001 Industrial Process Equipment

GP 007 Fabric Filter not subject to CAM without Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 007)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-38**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 011 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 011 Rail Lime Receiving

GP 001 Industrial Process Equipment

GP 003 Fabric Filters subject to CAM without Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING (see GP 003)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-39**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 012 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 012 Lime Silo

GP 001 Industrial Process Equipment

GP 003 Fabric Filters subject to CAM without Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING (see GP 003)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-40**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 013 Multiple Cyclone w/Fly Ash Reinjection-Common w/Coal Boilers**Associated Items:** EU 018 Bros Boiler

What to do	Why to do it
LIMITS	hdr
Pressure Drop: greater than or equal to 3.5 inches of water column using 3-hour Rolling Average, unless a new range is set pursuant to Minn. R. 7017.0205, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7007.0800, subp.4
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 80.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 80.0	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING	hdr
The Permittee shall operate and maintain the cyclone (CE 013) at any time that the process equipment controlled by the cyclone (EU 018) is in operation. The Permittee shall document periods of non-operation of the control equipment.	40 CFR Section 64.3; Minn. R. 7017.0200
The Permittee shall operate and maintain the multicclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall read and record pressure drop across the multicyclones twice daily.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Calibration: The Permittee shall calibrate the pressure drop monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Periodic Inspections: At least once per calendar year, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	40 CFR Section 64.3; Minn. R. 7017.0200
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the multicclone or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the multicclone. The Permittee shall keep a record of the type and date of any corrective action taken for each control device.	40 CFR Section 64.7(d); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored multicclone is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing pressure drop range, the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring change.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-41**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 014 Venturi Scrubber**Associated Items:** EU 018 Bros Boiler

GP 006 Venturi Scrubbers subject to CAM

What to do	Why to do it
LIMITS	hdr
Water flow rate: greater than or equal to 400 gallons/minute using 3-hour Rolling Average unless a new value is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7011.0510, subp. 1
Pressure Drop: greater than or equal to 6.5 inches of water column using 3-hour Rolling Average unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated.	Minn. R. 7011.0510, subp. 1
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 85.0 percent	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 85.0 percent	Minn. R. 7007.0800, subps. 2 and 14
COMPLIANCE ASSURANCE MONITORING (see GP 006)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-42**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 017 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 017 North Power Plant Ash Silo

GP 001 Industrial Process Equipment

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
Pressure Drop: greater than or equal to .5 inches of water column and less than or equal to 6 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-43**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 019 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 020 Starch Silos

GP 001 Industrial Process Equipment

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
Pressure Drop: greater than or equal to 0.5 inches of water column and less than or equal to 6.0 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-44**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 021 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 026 Chip Cyclones

GP 001 Industrial Process Equipment

GP 004 Fabric Filters subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
Pressure Drop: greater than or equal to 0.2 inches of water column and less than or equal to 4.0 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 004)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-45**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 024 Regenerative Thermal Oxidizer**Associated Items:** EU 027 TMP Refining

What to do	Why to do it
LIMITS	hdr
Temperature: greater than or equal to 1630 degrees F using 3-hour Rolling Average at the Combustion Chamber of CE024 unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the three-hour rolling average temperature drops below the minimum temperature limit, the VOC emissions during that time shall be considered uncontrolled until the average temperature limit is once again achieved. This shall be reported as a deviation.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall operate and maintain the thermal oxidizer any time that any process equipment controlled by the thermal oxidizer is in operation except during breakdowns, malfunctions, repairs, and periodic maintenance on the RTO.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. The recording device shall also calculate the three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5
Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment external system components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-46**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 025 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 021 SCA Paper Machines

GP 001 Industrial Process Equipment

GP 007 Fabric Filter not subject to CAM without Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-47**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 026 Fabric Filter - Low Temperature, i.e., T<180 Degrees F**Associated Items:** EU 009 B & W Boiler Ash Handling System

GP 001 Industrial Process Equipment

GP 008 Fabric Filter not subject to CAM with Pressure drop

What to do	Why to do it
LIMITS	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1(B)
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)
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 8.0 inches of water column , unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7007.0200; Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Total Particulate Matter: greater than or equal to 99.0	Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain control equipment such that it achieves a control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.0 percent	Minn. R. 7007.0800, subps. 2 and 14
ADDITIONAL REQUIREMENTS (see GP 008)	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-48**

11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

Subject Item: CE 027 Thermal Oxidizer**Associated Items:** EU 027 TMP Refining

What to do	Why to do it
LIMITS	hdr
Temperature: greater than or equal to 1400 degrees F using 3-hour Rolling Average at the Combustion Chamber of CE027 unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the three-hour rolling average temperature drops below the minimum temperature limit, the VOC emissions during that time shall be considered uncontrolled until the average temperature limit is once again achieved. This shall be reported as a deviation.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall operate and maintain the thermal oxidizer any time that any process equipment controlled by the thermal oxidizer is in operation except during breakdowns, malfunctions, repairs, and periodic maintenance on the RTO.	Title I Condition: Limit to avoid classification as a major source under 40 CFR 52.21
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. The recording device shall also calculate the three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment external system components. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE B: SUBMITTALS**B-1** 11/13/08

Facility Name: Verso Paper Co - Sartell Mill
Permit Number: 00900011 - 005

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

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

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

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

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

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

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

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**B-2** 11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due 45 days after CEMS Relative Accuracy Test Audit (RATA)	MR010, MR011, MR012
Testing Frequency Plan	due 60 days after Initial Performance Test for total particulate matter emissions. The plan shall specify a testing frequency based on the test data and MPCA guidance. Future performance tests based on one-year (12 month), 36 month, and 60 month intervals, or as applicable, shall be required upon written approval of the MPCA.	EU006

TABLE B: RECURRENT SUBMITTALS**B-3** 11/13/08

Facility Name: Verso Paper Co - Sartell Mill

Permit Number: 00900011 - 005

What to send	When to send	Portion of Facility Affected
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Initial Startup of the Monitor	EU006
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar half-year starting 03/31/2002	MR010, MR011, MR012
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 06/11/2003. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 06/11/2003 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX B Insignificant Activities

Facility Name: Verso Paper Co - Sartell

Permit Number: 00900011-005

On-Site Insignificant Activities and Applicable Requirements

- IA01 North Power Plant Stream Condensate Water System
7007.1300 Subp. 4
- IA02 South Power Plant Stream Condensate Water System
7007.1300 Subp. 4
- IA03 Kraft System
7007.1300 Subp. 4
- IA04 Brightening Operations
7007.1300 Subp. 4
- IA05 Sodium Hydrosulfite System
7007.1300 Subp. 3(D), 3(I) and 4
- IA06 No. 3 paper Machine Coating preparation
7007.1300 Subp. 4
- IA07 North Power Plant Coal Handling System
7007.1300 Subp. 3(I)
- IA08 Live Lime Bin
7007.1300 Subp. 3(I)
- IA09 SO₂ removal and PM Scrubber System
7007.1300 Subp. 3(I)
- IA10 Wastewater Sludge System
7007.1300 Subp. 3(I)
- IA11 Miscellaneous Mill Activities
7007.1300 Subp. 3(D), 3(G), 3(H)(4), 3(I) and 4
- IA12 Miscellaneous Mill Activity: Roll Wrap
7007.1300 Subp. 4
- IA13 Miscellaneous Internal combustion Engines: Battery Charger Gas Engine, and 2 Gas-fired Trash Pumps
7007.1300 Subp. 4
- IA14 Water Treatment System
7007.1300 Subp. 4

APPENDIX B Insignificant Activities**Facility Name:** Verso Paper Co - Sartell**Permit Number:** 00900011-005

IA15 Temporary Wood Residue and Sludge Piles

7007.1300 Subp. 4

IA16 Log Storage

7007.1300 Subp. 4

IA17 Coal Stockpile

7007.1300 Subp. 4

IA20 Coal transfer to NNP

7007.1300 Subp. 4

IA21 Infrared Electric Ovens

7007.1300 Subp. 3 (b) (1)

The following insignificant activities are also done by the facility.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane.	Minn. R. 7011.0510/0515
3(H)	Miscellaneous:	
	4. brazing, soldering or welding equipment;	Minn. R. 7011.0710/0715
	5. blueprint copiers and photographic processes;	Minn. R. 7011.0105/0110
	8. cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners.	Minn. R. 7011.0105/0110
3(K)	Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source, such as spray painting of buildings, machinery, vehicles, and other supporting equipment.	Minn. R. 7011.0710/0715

APPENDIX C Modeling Data **Facility Name: Verso Paper Co - Sartell** **Permit Number: 00900011-005**

*** AERMOD - VERSION 07026 ***										*** VERSO PAPER SARTELL PM10 TITLE V MODELING										***		06/04/07	
*** AERMOD 5/23/2007										All five years										***		14:57:22	
U:\PROJECTS\DBECKER\PROJECTS\VPCJUN07\VP86_90d.out																							
**This Run Includes: 145 Source(s); 30 Source Group(s); and 2923 Receptor(s)																							
AREA	SRCIDNT	EASTING	NORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	XDIM (M)	YDIM (M)												
VOLUME	SRCIDNT	EASTING	NORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	SYI (M)	SZI (M)												
AREACIRC	SRCIDNT	EASTING	NORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	RADIUS	#VERTS.												
AREAPOLY	SRCIDNT	EASTING	NORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	#VERTS.	SZI (M)												
POINT	SRCIDNT	EASTING	NORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	DIA (M)	DIA (FT)	DEG (K)	DEG (C)	DEG (F)	VS (M/S)	VS (F/M)	ACFM						
POINT	ST901	406411	5052731	308	0.00	0.04	0.16	11.95	39.21	0.910	2.986	295.	22.	72.	20.84	4102.36	28719						
POINT	ST902	406384	5052732	308	0.00	0.02	0.08	12.28	40.29	1.280	4.199	291.	18.	65.	10.26	2019.69	27975						
POINT	ST903	406376	5052724	308	0.00	0.02	0.10	12.28	40.29	1.280	4.199	291.	18.	65.	13.15	2588.58	35854						
POINT	ST904	406393	5052719	308	0.00	0.02	0.08	16.15	52.99	1.280	4.199	291.	18.	65.	10.26	2019.69	27975						
POINT	ST905	406375	5052710	308	0.00	0.02	0.10	16.06	52.69	1.280	4.199	291.	18.	65.	13.13	2584.65	35800						
POINT	ST906	406396	5052706	308	0.00	0.02	0.08	21.55	70.70	1.280	4.199	291.	18.	65.	10.26	2019.69	27975						
POINT	ST907	406403	5052708	308	0.00	0.02	0.08	15.76	51.71	0.910	2.986	291.	18.	65.	20.10	3956.69	27700						
POINT	ST015	406380	5052311	308	5.28	41.90	183.53	91.44	300.00	3.050	10.007	328.	55.	131.	8.04	1582.68	124466						
POINT	ST017	406416	5052341	308	0.42	3.36	14.70	26.37	86.52	0.760	2.493	293.	20.	68.	20.31	3998.03	19522						
POINT	ST022	406418	5052336	308	0.02	0.18	0.77	26.52	87.01	0.270	0.886	333.	60.	140.	4.73	931.10	574						
POINT	ST026	406420	5052326	308	0.04	0.32	1.39	1.52	4.99	0.300	0.984	293.	20.	68.	0.00	0.00	0						
POINT	ST027	406414	5052317	308	0.16	1.26	5.53	24.99	81.99	0.300	0.984	293.	20.	68.	0.00	0.00	0						
POINT	ST217	406276	5052633	308	1.70	13.50	59.13	48.16	158.01	2.440	8.005	322.	49.	120.	10.52	2070.87	104230						
POINT	ST217A	406276	5052633	308	9.00	71.43	312.84	48.16	158.01	2.440	8.005	322.	49.	120.	10.52	2070.87	104230						
POINT	ST335	406362	5052460	308	0.11	0.87	3.82	26.52	87.01	1.280	4.199	334.	61.	142.	14.35	2824.80	39126						
POINT	ST001	406401	5052686	308	0.20	1.62	7.09	30.48	100.00	0.240	0.787	293.	20.	68.	0.00	0.00	0						
POINT	ST003	406484	5052035	308	0.31	2.46	10.78	16.31	53.51	1.390	4.560	293.	20.	68.	9.09	1789.37	29227						
POINT	ST004	406435	5052082	308	0.13	1.03	4.52	9.14	29.99	1.060	3.478	293.	20.	68.	6.37	1253.94	11911						
POINT	ST814	406321	5052623	308	0.01	0.07	0.31	9.39	30.81	0.460	1.509	305.	32.	90.	10.16	2000.00	3578						
POINT	ST008	406393	5052349	308	0.28	2.20	9.63	42.31	138.81	0.760	2.493	293.	20.	68.	0.00	0.00	0						
POINT	ST221	406301	5052619	308	0.02	0.12	0.54	12.56	41.21	0.770	2.526	333.	60.	140.	0.06	11.81	59						
POINT	ST012	406302	5052578	308	0.06	0.50	2.19	10.36	33.99	0.240	0.787	300.	27.	80.	0.00	0.00	0						
POINT	ST1723	406331	5052396	308	0.06	0.48	2.09	2.13	6.99	0.210	0.689	293.	20.	68.	17.16	3377.95	1259						
POINT	RTO	406344	5052653	308	0.00	0.02	0.10	18.29	60.01	1.220	4.003	1119.	846.	1555.	9.50	1870.08	23531						
POINT	OLDRTO	406344	5052653	308	0.00	0.02	0.10	12.19	39.99	1.070	3.510	1119.	846.	1555.	12.41	2442.91	23645						
VOLUME	G1116	406418	5052344	308	0.00	0.00	0.00	2.13	6.99	2.890	11.840												
VOLUME	G1123	406295	5052620	308	0.00	0.00	0.01	0.15	0.49	0.290	0.070												
VOLUME	G1130	406301	5052619	308	0.00	0.00	0.00	2.13	6.99	4.750	0.990												
VOLUME	01004	406489	5052416	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	01005	406482	5052403	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	01006	406476	5052390	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	01007	406470	5052376	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03002	406476	5052442	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03003	406470	5052461	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03004	406465	5052481	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03005	406463	5052501	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03006	406462	5052521	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03007	406460	5052540	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03008	406459	5052560	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03009	406457	5052580	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03010	406455	5052600	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03011	406454	5052620	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03012	406453	5052640	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												
VOLUME	03013	406452	5052660	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420												

APPENDIX C Modeling Data
Facility Name: Verso Paper Co - Sartell
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VOLUME 03014	406452	5052680	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03015	406451	5052700	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03016	406450	5052720	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03017	406449	5052740	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03018	406449	5052760	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03019	406448	5052780	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03020	406447	5052800	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03021	406446	5052820	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03022	406446	5052840	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03023	406445	5052860	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03024	406444	5052880	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03025	406443	5052900	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03026	406434	5052912	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03027	406414	5052913	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03028	406394	5052913	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03029	406381	5052904	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03030	406376	5052884	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03031	406372	5052865	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03032	406367	5052845	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03033	406363	5052826	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03034	406358	5052806	308	0.01	0.06	0.28	1.52	4.99	11.340	1.420
VOLUME 03035	406345	5052774	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME 03036	406352	5052756	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME 03037	406360	5052738	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME 03038	406350	5052788	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 03039	406342	5052769	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 03040	406334	5052751	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 04001	406327	5052733	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 04002	406319	5052714	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06001	406471	5052376	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06002	406452	5052373	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06003	406433	5052369	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07001	406430	5052369	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07002	406410	5052368	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07003	406390	5052367	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07004	406371	5052365	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07005	406351	5052364	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07006	406331	5052363	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07007	406312	5052361	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08001	406313	5052361	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08002	406300	5052356	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08003	406287	5052350	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08004	406278	5052363	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08005	406270	5052376	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08006	406262	5052389	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09001	406262	5052388	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09002	406258	5052403	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09003	406254	5052417	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09004	406250	5052431	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09005	406257	5052442	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09006	406265	5052452	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A001	406251	5052432	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A002	406243	5052446	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A003	406235	5052460	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A004	406228	5052473	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420

APPENDIX C Modeling Data
Facility Name: Verso Paper Co - Sartell
Permit Number: 00900011-005

VOLUME	10001	406320	5052698	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10002	406322	5052679	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10003	406322	5052659	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10004	406319	5052639	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10005	406468	5052360	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10006	406469	5052340	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10007	406470	5052320	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10008	406471	5052300	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10009	406472	5052280	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10010	406473	5052260	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10011	406474	5052241	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10012	406475	5052221	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10013	406476	5052201	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10014	406478	5052181	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10015	406482	5052161	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10016	406492	5052144	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10017	406501	5052126	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	10018	406510	5052108	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	11001	406519	5052090	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	11002	406526	5052072	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	12001	406532	5052053	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	12002	406539	5052034	308	0.01	0.06	0.27	1.52	4.99	11.340	1.420
VOLUME	12003	406462	5052107	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	12004	406471	5052089	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13001	406480	5052071	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13002	406489	5052053	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13003	406433	5052284	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13004	406433	5052264	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13005	406436	5052244	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13006	406439	5052224	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13007	406443	5052205	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13008	406449	5052185	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13009	406454	5052166	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13010	406457	5052146	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13011	406460	5052127	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13012	406430	5052364	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14001	406431	5052344	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14002	406431	5052324	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14003	406432	5052304	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14004	406546	5052015	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15001	406562	5052005	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15002	406581	5052012	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15003	406599	5052019	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15004	406607	5052030	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15005	406625	5052034	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
VOLUME	15006	406646	5052041	308	0.01	0.07	0.31	1.52	4.99	11.340	1.420
TOTAL					18.43	146.30	640.78				
SUMP=					17.83	141.49	619.71				
SUMV=					0.61	4.81	21.07				

APPENDIX C Modeling Data **Facility Name: Verso Paper Co - Sartell** **Permit Number: 00900011-005**

*** AERMOD - VERSION 07026 *** *** VERSO PAPER SARTELL | PM10 TITLE V MODELING
 *** AERMOD | 5/23/2007 All five years

*** 06/06/07
 *** 11:55:47

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**This Run Includes: 145 Source(s);				31 Source Group(s); and				2923 Receptor(s)									
AREA	SRCIDNT	EASTINGNORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	XDIM (M)	YDIM (M)							
VOLUME	SRCIDNT	EASTINGNORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	SYI (M)	SZI (M)							
AREACIRC	SRCIDNT	EASTINGNORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	RADIUS	#VERTS.							
AREAPOLY	SRCIDNT	EASTINGNORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	#VERTS.	SZI (M)							
POINT	SRCIDNT	EASTINGNORTHING	ELEV (M)	G/SEC	#/HOURL	T/YEAR	HGT (M)	HGT (FT)	DIA (M)	DIA (FT)	DEG (K)	DEG (C)	DEG (F)	VS (M/S)	VS (F/M)	ACFM	
POINT	ST901	406411	5052731	308	0.00	0.04	0.16	11.95	39.21	0.910	2.986	295.	22.	72.	20.84	4102.36	28719
POINT	ST902	406384	5052732	308	0.00	0.02	0.08	12.28	40.29	1.280	4.199	291.	18.	65.	10.26	2019.69	27975
POINT	ST903	406376	5052724	308	0.00	0.02	0.10	12.28	40.29	1.280	4.199	291.	18.	65.	13.15	2588.58	35854
POINT	ST904	406393	5052719	308	0.00	0.02	0.08	16.15	52.99	1.280	4.199	291.	18.	65.	10.26	2019.69	27975
POINT	ST905	406375	5052710	308	0.00	0.02	0.10	16.06	52.69	1.280	4.199	291.	18.	65.	13.13	2584.65	35800
POINT	ST906	406396	5052706	308	0.00	0.02	0.08	21.55	70.70	1.280	4.199	291.	18.	65.	10.26	2019.69	27975
POINT	ST907	406403	5052708	308	0.00	0.02	0.08	15.76	51.71	0.910	2.986	291.	18.	65.	20.10	3956.69	27700
POINT	ST015	406380	5052311	308	5.28	41.90	183.53	91.44	300.00	3.050	10.007	328.	55.	131.	8.04	1582.68	124466
POINT	ST017	406416	5052341	308	0.42	3.36	14.70	26.37	86.52	0.760	2.493	293.	20.	68.	20.31	3998.03	19522
POINT	ST022	406418	5052336	308	0.02	0.18	0.77	26.52	87.01	0.270	0.886	333.	60.	140.	4.73	931.10	574
POINT	ST026	406420	5052326	308	0.04	0.32	1.39	1.52	4.99	0.300	0.984	293.	20.	68.	0.00	0.00	0
POINT	ST027	406414	5052317	308	0.16	1.26	5.53	24.99	81.99	0.300	0.984	293.	20.	68.	0.00	0.00	0
POINT	ST217	406276	5052633	308	1.70	13.50	59.13	48.16	158.01	2.440	8.005	322.	49.	120.	10.52	2070.87	104230
POINT	ST217A	406276	5052633	308	9.00	71.43	312.84	48.16	158.01	2.440	8.005	322.	49.	120.	10.52	2070.87	104230
POINT	ST335	406362	5052460	308	0.11	0.87	3.82	26.52	87.01	1.280	4.199	334.	61.	142.	14.35	2824.80	39126
POINT	ST001	406401	5052686	308	0.20	1.62	7.09	30.48	100.00	0.240	0.787	293.	20.	68.	0.00	0.00	0
POINT	ST003	406484	5052035	308	0.31	2.46	10.78	16.31	53.51	1.390	4.560	293.	20.	68.	9.09	1789.37	29227
POINT	ST004	406435	5052082	308	0.13	1.03	4.52	9.14	29.99	1.060	3.478	293.	20.	68.	6.37	1253.94	11911
POINT	ST814	406321	5052623	308	0.01	0.07	0.31	9.39	30.81	0.460	1.509	305.	32.	90.	10.16	2000.00	3578
POINT	ST008	406393	5052349	308	0.28	2.20	9.63	42.31	138.81	0.760	2.493	293.	20.	68.	0.00	0.00	0
POINT	ST221	406301	5052619	308	0.02	0.12	0.54	12.56	41.21	0.770	2.526	333.	60.	140.	0.06	11.81	59
POINT	ST012	406302	5052578	308	0.06	0.50	2.19	10.36	33.99	0.240	0.787	300.	27.	80.	0.00	0.00	0
POINT	ST1723	406331	5052396	308	0.06	0.48	2.09	2.13	6.99	0.210	0.689	293.	20.	68.	17.16	3377.95	1259
POINT	RTO	406344	5052653	308	0.00	0.02	0.10	18.29	60.01	1.220	4.003	1119.	846.	1555.	9.50	1870.08	23531
POINT	OLDRTO	406344	5052653	308	0.00	0.02	0.10	12.19	39.99	1.070	3.510	1119.	846.	1555.	12.41	2442.91	23645
VOLUME	G1116	406418	5052344	308	0.00	0.00	0.00	2.13	6.99	2.890	11.840						
VOLUME	G1123	406295	5052620	308	0.00	0.00	0.01	0.15	0.49	0.290	0.070						
VOLUME	G1130	406301	5052619	308	0.00	0.00	0.00	2.13	6.99	4.750	0.990						
VOLUME	01004	406489	5052416	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	01005	406482	5052403	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	01006	406476	5052390	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	01007	406470	5052376	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03002	406476	5052442	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03003	406470	5052461	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03004	406465	5052481	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03005	406463	5052501	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03006	406462	5052521	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03007	406460	5052540	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03008	406459	5052560	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03009	406457	5052580	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03010	406455	5052600	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03011	406454	5052620	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						
VOLUME	03012	406453	5052640	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420						

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VOLUME 03013	406452	5052660	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03014	406452	5052680	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03015	406451	5052700	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03016	406450	5052720	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03017	406449	5052740	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03018	406449	5052760	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03019	406448	5052780	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03020	406447	5052800	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03021	406446	5052820	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03022	406446	5052840	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03023	406445	5052860	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03024	406444	5052880	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03025	406443	5052900	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03026	406434	5052912	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03027	406414	5052913	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03028	406394	5052913	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03029	406381	5052904	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03030	406376	5052884	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03031	406372	5052865	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03032	406367	5052845	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03033	406363	5052826	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03034	406358	5052806	308	0.00	0.03	0.15	1.52	4.99	11.340	1.420
VOLUME 03035	406345	5052774	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME 03036	406352	5052756	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME 03037	406360	5052738	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME 03038	406350	5052788	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 03039	406342	5052769	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 03040	406334	5052751	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 04001	406327	5052733	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 04002	406319	5052714	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06001	406471	5052376	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06002	406452	5052373	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 06003	406433	5052369	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07001	406430	5052369	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07002	406410	5052368	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07003	406390	5052367	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07004	406371	5052365	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07005	406351	5052364	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07006	406331	5052363	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 07007	406312	5052361	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08001	406313	5052361	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08002	406300	5052356	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08003	406287	5052350	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08004	406278	5052363	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08005	406270	5052376	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 08006	406262	5052389	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09001	406262	5052388	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09002	406258	5052403	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09003	406254	5052417	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09004	406250	5052431	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09005	406257	5052442	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 09006	406265	5052452	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A001	406251	5052432	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A002	406243	5052446	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME 9A003	406235	5052460	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420

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VOLUME	9A004	406228	5052473	308	0.00	0.00	0.01	1.52	4.99	11.340	1.420
VOLUME	10001	406320	5052698	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10002	406322	5052679	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10003	406322	5052659	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10004	406319	5052639	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10005	406468	5052360	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10006	406469	5052340	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10007	406470	5052320	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10008	406471	5052300	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10009	406472	5052280	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10010	406473	5052260	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10011	406474	5052241	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10012	406475	5052221	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10013	406476	5052201	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10014	406478	5052181	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10015	406482	5052161	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10016	406492	5052144	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10017	406501	5052126	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	10018	406510	5052108	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	11001	406519	5052090	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	11002	406526	5052072	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	12001	406532	5052053	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	12002	406539	5052034	308	0.00	0.03	0.14	1.52	4.99	11.340	1.420
VOLUME	12003	406462	5052107	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	12004	406471	5052089	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13001	406480	5052071	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13002	406489	5052053	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	13003	406433	5052284	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13004	406433	5052264	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13005	406436	5052244	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13006	406439	5052224	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13007	406443	5052205	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13008	406449	5052185	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13009	406454	5052166	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13010	406457	5052146	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13011	406460	5052127	308	0.00	0.02	0.10	1.52	4.99	11.340	1.420
VOLUME	13012	406430	5052364	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14001	406431	5052344	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14002	406431	5052324	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14003	406432	5052304	308	0.00	0.01	0.05	1.52	4.99	11.340	1.420
VOLUME	14004	406546	5052015	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15001	406562	5052005	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15002	406581	5052012	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15003	406599	5052019	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15004	406607	5052030	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15005	406625	5052034	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
VOLUME	15006	406646	5052041	308	0.01	0.04	0.18	1.52	4.99	11.340	1.420
TOTAL					18.18	144.26	631.82				
SUMP=					17.83	141.49	619.71				
SUMV=					0.35	2.76	12.11				

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*** AERMOD - VERSION 07026 ***      *** VERSO PAPER SARTELL | SO2 TITLE V MODELING      ***      06/05/07
*** AERMOD | 6/05/2007              ***      14:34:47
U:\PROJECTS\DBECKER\PROJECTS\VPCJUN07\VSaS86f.OUT
**This Run Includes:      5 Source(s);      5 Source Group(s); and      2924 Receptor(s)
  AREA SRCIDNT EASTINGNORTHING ELEV(M) G/SEC #/HOURL T/YEAR HGT(M) HGT(FT) XDIM(M) YDIM(M)
  VOLUME SRCIDNT EASTINGNORTHING ELEV(M) G/SEC #/HOURL T/YEAR HGT(M) HGT(FT) SYI(M) SZI(M)
AREACIRC SRCIDNT EASTINGNORTHING ELEV(M) G/SEC #/HOURL T/YEAR HGT(M) HGT(FT) RADIUS #VERTS.
AREAPOLY SRCIDNT EASTINGNORTHING ELEV(M) G/SEC #/HOURL T/YEAR HGT(M) HGT(FT) #VERTS. SZI(M)
  POINT SRCIDNT EASTINGNORTHING ELEV(M) G/SEC #/HOURL T/YEAR HGT(M) HGT(FT) DIA(M) DIA(FT) DEG(K) DEG(C) DEG(F) VS(M/S) VS(F/M) ACFM
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POINT ST015      406380 5052311      308      62.75 498.00 2181.12      91.44 300.00      3.050 10.007      328.      55.      131.      8.04 1582.68 124466
POINT ST217      406276 5052633      308      0.01      0.08      0.35      48.16 158.01      2.440 8.005      322.      49.      120.      5.26 1035.43 52115
POINT ST217A     406276 5052633      308     17.99 142.80 625.44      48.16 158.01      2.440 8.005      322.      49.      120.      5.26 1035.43 52115
POINT ST335      406362 5052460      308      0.00      0.00      0.01      26.52 87.01      1.280 4.199      334.      61.      142.     14.35 2824.80 39126
POINT RTO        406344 5052653      308      0.00      0.00      0.01      18.29 60.01      1.220 4.003     1119.     846.     1555.      9.50 1870.08 23531
TOTAL                                80.75 640.89 2806.93

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APPENDIX C Modeling Data
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APPENDIX C Modeling Data
Facility Name: Verso Paper Co - Sartell
Permit Number: 00900011-005

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 00900011-005

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

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2621)
Verso Paper Co 100 E Sartell St. Sartell MN, 56377	100 E Sartell St Sartell Benton County
Contact: Patricia Hansen Environmental Program Manager Phone: 320-240-7576	

1.2. Description of the Permit Action

This permit action is the reissuance the Part 70 permit.

1.3. Description of facility

International Paper operates a thermo-mechanical pulp (TMP) and paper mill in Sartell, Minnesota. The mill site includes 66 acres adjacent to the Mississippi River. The mill converts hardwood and softwood logs into wood pulp and paper through a variety of process operations.

Logs are received at the mill from rail or truck delivery systems, sorted and stored and transferred to the subsequent operations. Logs are first debarked and then processed through a chipping and screening operation. The chips are stored and/or directly transferred to the TMP operation. The TMP process uses steam and mechanical processing to produce pulp. Steam from the TMP process is provided by one of three on-site boilers operated in the Utilities area. The boilers are capable of burning a variety of fuels including natural gas, wood waste, coal and/or sludge, and specification waste oil.

The pulp produced in the TMP process is washed and brightened using water and chemicals. The brightened pulp is stored and transferred to one of three paper machines. The paper machines produce a variety of paper grades using the pulp on-site or a blend of kraft or other

imported materials. The mill also contains a finishing area where paper is trimmed and cut to size prior to shipment to off-site customers.

Emissions from the facility include particulates from coal, lime, and ash handling and/or burning; and sulfur dioxide, nitrogen oxides, carbon monoxide and hazardous air pollutants from the coal and natural gas-fired boilers.

1.3 Description of any Changes Allowed with this Permit Issuance

This permit only incorporates previously authorized changes to the facility. There are no new permit changes.

The following changes are also added to this permit:

- Corrected COMS Alternative Monitoring reference from 40 CFR 60.143(b) to 40 CFR 60.13(b).
- Added Regenerative Thermal Oxidizers CE024 (backup) and CE027 (primary) as an associated items to TMP refining (EU027).
- Incorporated requirements for permit authorized Diesel Pump Engine.
- Incorporated requirements for permit authorized pneumatic ash handling system (EU009)
- Update to reflect current MPCA templates and standard citation formatting.
- Compliance Assurance Monitoring (CAM) requirements have been added.
- Remove completed requirements.
- Update data in Delta for existing emission units, control equipments, and stack vents.
- Update the efficiencies for control equipment.

1.4 Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit and to be Included in the Part 70 Permit

Permit Number and Issuance Date	Action Authorized
00900011-002 September 10, 2003	Administrative amendment
00900011-003 January 25, 2005	Administrative amendment

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

The potential to emit for this facility has changed from the last permit because of updated emission factors. The increases in PTE of criteria pollutants are not due this rather then modification to the facility.

	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	381	321	2624	1221	817	270	1.19	87	269
Total Facility Actual Emissions (2006)	104	45.0	816	674	356	220	0.04	104	45.0

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC		
Part 70 Permit Program	PM, PM ₁₀ , SO ₂ , NO _x , CO, VOC		
Part 63 NESHAP	Single and Total HAPs		

2. Regulatory and/or Statutory Basis

New Source Review

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

Part 70 Permit Program

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

New Source Performance Standards (NSPS)

EU006 B&W boiler is subject to 40 CFR Part 60, Subpart D. EU019 Package Boiler is subject to 40 CFR Dc (specifically 60.48c).

Compliance Assurance Monitoring (CAM)

The facility has Control Equipment that CAM now applies. Units subject to CAM requirements are in GP003, GP004, GP005, GP006.

Environmental Assessment Worksheet (EAW)/Environmental Impact Statement (EIS):

In this permit action (PER 005), Verso Paper Co did not make many modification and therefore did not have potential for air emissions to increase in excess of 100 tpy. Therefore, both EAW and EIS are not required at this time.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility is a major source of HAPs.

Verso Paper Co is an affected facility under 40 CFR 63 Subpart S; the Pulp and Paper Production (non-chemical) NESHAP (compliance 4/16/01). However, the Sartell mill uses no chlorine or chlorinated compounds for bleaching and is exempt from the standards in 40 CFR 63.445, but the general provisions of 40 CFR Part 63, subpart A do apply as per 40 CFR 63.440(g). The mill is in compliance with all provisions of Subpart S.

Verso Paper Co is not an affected facility under 40 CFR Subpart JJJJ; Paper and Other Web Coating NESHAP (compliance 12/5/05). The facility is not an affected facility because it only uses water-based clays, starch, and latex in the web coating process. This determination is based upon the November 19, 2003 letter from U.S. EPA's Office of Enforcement and Compliance Assurance. The EPA letter can be found as attachment to the TSD.

The facility will be subject to the pending NESHAP, 40 CFR pt. 63, subp. DDDDD "Industrial Boilers" category standards, as it applies, after promulgation as a final rule.

Minnesota State Rules

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

- Minn. R. 7011.0510 Standards of Performance for Existing Indirect Heating Equipment
- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment
- Minn. R. 7011.1150 Standards of Performance For New Out-state Coal Handling Facilities.
- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0710 Standards of Performance for Pre-1969 Industrial Process Equipment
- Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

Table 3. Regulatory Overview of Facility

EU, GRP, or SV #	Applicable Regulations	Comments:
GP001	Minn. R. 7007.0715	Standards of Performance for Post-1969 Industrial Process Equipment
GP002	Minn. R. 7011.1150	Standards of Performance For New Out-state Coal

		Handling Facilities. The baghouses are not required to meet the limits, so no pressure drop ranges are required in the permit.
EU006	40 CFR Part 60, Subpart D 40 CFR 61.52	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971. The provisions of this subpart are applicable to those stationary sources which incinerate or dry wastewater treatment plant sludge
EU015, EU018	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment
EU017	Minn. R. 7007.0710	Standards of Performance for Pre-1969 Industrial Process Equipment
EU019	40 CFR 60.48c	Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
EU024, EU027, EU028	40 CFR 52.21	Prevention of Significant Deterioration. Production limits
EU024	Minn. R. 7011.0610	Standards of Performance for New Indirect Heating Equipment
EU032	Minn. R. 7011.2300	Standards of Performance For Stationary Internal Combustion Engines
GP003, GP004, GP005, GP006	40 CFR Part 64.3	Compliance Assurance Monitoring

3. Technical Information

Sulfur content

Sulfur content testing for fuels burned in B&W boiler (EU006). Conduct daily fuel sampling and analysis to determine compliance with SO₂ limit, beginning within 2 operating days whenever the SO₂ monitor is out of service or out of calibration. Collect separate coal samples in accordance with an approved ASTM method. Wood waste and sludge % sulfur content shall be based on historic testing values of .04% and .011% respectfully. These values are based on data provided by the permittee. These values come from the average of 83 tests done between 2001 and 2007 which was then multiplied by a safety factor of 1.2.

Unpermitted insignificant modification (2005-2008)

Emissions Increase Analysis was done on all insignificant modifications made to Paper machine #3. Calculations are included in attachment 1 of the TSD. Calculations show that some of the

projects possibly did not qualify as insignificant modifications. Compliance and Enforcement has determined that these modifications did not violate and permit requirements or limits.

SCA Paper Machine (EU021)

This emission unit actually consists of paper machine #1, paper machine #2, and two Super Calendaring Machines. This is a deviation from normal permitting practice that would normally separate all of these machines as their own emission unit. Stack tests were performed to develop accurate emission factors for these operations. The equipment share common stacks that could not easily be separated.

Modeling

Verso Paper Co submitted required Title V air modeling data June 13, 2007. Modeling parameters are found in appendix C of the permit.

Other updates and corrections

- Corrected COMS Alternative Monitoring reference from 40 CFR 60.143(b) to 40 CFR 60.13(b).
- Added Regenerative Thermal Oxidizers CE024 (backup) and CE027 (primary) as an associated items to TMP refining.
- Incorporated requirements for permit authorized Diesel Pump Engine.
- Incorporated requirements for permit authorized pneumatic ash handling system (EU009)

3.1 Calculations of Potential to Emit

The potential to emit for this facility has changed from the last permit because of updated emission factors. Most of the increases in PTE of criteria pollutants are not due modifications to the facility but rather updated emissions factors. Attachment 1 to this TSD summarizes the PTE of the Facility. Attachment 1 also contains detailed spreadsheets and supporting information on modification made to paper machine #3 prepared by the MPCA and the Permittee.

Emission calculations are based from emission factors from many sources. Most calculations use factors found in the AP-42/Webfire databases.

National Council for Air and Stream Improvement (NCASI) Technical Bulletin 858 Table 20A&B emission factors are used to calculate Hazardous Air Pollutants (HAP) PTE for EU 006 (B&W boiler). NCASI Technical Bulletin 740 Emission factor are used to calculate HAP emissions from EU024(Paper Machine #3). NCASI Technical Bulletin

738 emission factors are used to calculate HAP emissions from EU027(TMP Refining) and EU028(TMP Screening).

There are also facility specific emission factors that have been derived from testing. These facility specific emission factors apply to EU001(Wood Processing), hydrogen chloride and hydrogen fluoride only for EU006(B&W Boiler), EU021(SCA Paper Machine), VOC emissions for EU027(TMP Refining) and EU028(TMP Screening).

Title I limits also effect the EU006(B&W boiler), EU024(Paper Machine #3), EU027(TMP Refining), and EU028(TMP Screening).

3.2 Periodic Monitoring

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

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

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

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

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
GP 001 (industrial process equipment)	PM \leq 0.30 grains/dry standard cubic foot	Control Equipment O & M Daily record keeping	Due to the nature of the process it is very unlikely that the limit will be exceeded.
EU001 (Wood processing)	PM \leq 0.30 grains/dry standard cubic foot Minn. R. 7011.0715, subp. 1(A)		Due to the nature of the process it is very unlikely that the limit will be exceeded.

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
EU006 (B&W Boiler)	PM \leq 0.10 lbs/MMBtu 40 CFR part 60 Subpart D	Control Equipment O & M Daily record keeping	Stack tests have confirmed emission factors.
EU006 (B&W Boiler)	SO ₂ \leq 1.2 lbs/MMBtu Nox \leq 0.70 lbs/MMBtu 40 CFR part 60 Subpart D	Continuous emissions monitors	
EU015 (Wickes Boiler)	PM \leq 0.60 lbs/MMBtu SO ₂ \leq 4.0 lbs/MMBtu Minn. R. 7011.0510, subp. 1	Control Equipment O & M Daily record keeping	Control equipment and recordkeeping when combusting fuels other than natural gas. It is very unlikely that these limit will be violated.
EU016 (North Power Plant Ash handling)	PM \leq 0.30 grains/dry standard cubic foot Minn. R. 7011.0715, subp. 1(A)	Record keeping	Water sprayers will be needed when the system is in operation.
EU018 (Bros Boiler)	PM \leq 0.60 lbs/MMBtu Minn. R. 7011.0510, subp. 1	Control Equipment O & M Daily record keeping	Due to the nature of the process it is very unlikely that the limit will be exceeded.
EU018 (Bros Boiler)	SO ₂ \leq 1.2 lbs/MMBtu Minn. R. 7007. 0800 subp. 2 (modeling limit)	Control Equipment O & M Daily record keeping 12 month rolling sum	The facility modeled at this limit to show compliance with national ambient air quality standards.
EU021 (SCA paper machine)	PM \leq 0.30 grains/dry standard cubic foot Minn. R. 7011.0715, subp. 1(A)	Good operating and maintenance practices	Due to the nature of the process it is very unlikely that the limit will be exceeded.
EU024 (Paper Machine 3)	Product produced \leq 800 tons Title I Condition: Limit to avoid classification as	12 month rolling sum	Limit taken to avoid classification as a major modification under PSD.

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	a major source status 40 CFR 52.21.		
EU024 (Paper Machine 3)	Stream consumption \leq 203 MMBtu/day Title I Condition: Limit to avoid classification as a major source status 40 CFR 52.21.	Calculations Recordkeeping	Limit taken to avoid classification as a major modification under PSD.
EU024 (Paper Machine 3)	PM \leq 0.30 grains/dry standard cubic foot Minn. R. 7011.0715, subp. 1(A)	Good operating and maintenance practices	Due to the nature of the process it is very unlikely that the limit will be exceeded.
EU027 (TMP Refining)	VOC \leq 0.10 lb/product produced Title I Condition: Limit to avoid classification as a major source under	Control Equipment O & M Daily record keeping 12 month rolling sum	Testing is required to show compliance.
EU028 (TMP Screening and Cleaning)	Production \leq 468 tons/day Title I Condition: Limit to avoid classification as a major source status	Daily recordkeeping	Daily combined output of both TMP lines.
EU032 (welding generator) EU034 (Diesel Pump Engine) EU035 (emergency Generators)	SO ₂ \leq 0.5 lbs/MMBtu Minn. R. 7011.2300, subp. 2	Recordkeeping Fuel certification	Due to low sulfur content of available fuel it is very unlikely that the limit will be violated.

3.3 Insignificant Activities

Verso paper Co. has several operations which are classified as insignificant activities. These are listed in Appendix B to the permit.

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

Table 5. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Space heaters fueled by kerosene, natural gas or propane	PM, variable depending on airflow Opacity \leq 20% with exceptions (Minn. R. 7011.0610)	For these units based on the fuels used and published emissions factors, it is highly unlikely that they could violate the applicable requirement. These units are vented inside a building, so testing is not feasible.
Brazing, soldering or welding equipment	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	Opacity \leq 20% (Minn. R. 7011.0110)	While no emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into the building, so monitoring or testing is not feasible.
Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners	PM, variable depending on airflow Opacity \leq 20% (Minn. R.	For these units, there are some factors available for the burners, but very little information regarding the cleaning operation itself. However, based on general knowledge of how they operate, it is highly unlikely that they

Insignificant Activity	General Applicable Emission limit	Discussion
	7011.0610 + Minn. R. 7011.0715)	could violate the applicable requirement or that testing would be feasible.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities	PM, variable depending on airflow or process weight rate Opacity \leq 20% (Minn. R. 7011.0715)	While spray equipment will have the potential to emit particulate matter, these particular activities are those not associated with production, so they would be infrequent and usually occur outdoors. Testing or monitoring is not feasible.

3.4 Permit Organization

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

3.5 Comments Received

Public Notice Period: September 27, 2008 – October 27, 2008

EPA 45-day Review Period: September 27, 2008 – November 12, 2008

Comments were not received from the public during the public notice period. Comments were not received from EPA during their review period.

3.6 Permit Shield

Permit Shield: International Paper asked that MPCA place several permit shield requests into the Title V permit. The Title V permit is a compilation of the requirements that do apply to the facility. MPCA does not place all of the conditions that do not apply, in a permit. The permit shield is for those requirements that do apply to a facility. The shield says that if you comply with the requirements in your permit that are written to ensure compliance with a specific rule,

then you are in compliance with the rule. If the requirement does not apply, then it is not in the permit. If we shielded from everything that did not apply to a facility we would have to include the entire Code of Federal Regulations in every permit. Also, there does not seem to be a need to place a shield in the permit for any of the requests as it seems obvious that they do not apply. Take for instance the first example, a shield from subpart Db. If the unit was constructed prior to June 19, 1984 and there have been no modifications to the unit, then the subpart does not apply as per the applicability section of the subpart unless the unit has been modified since that date. If it has not been modified, then there is no need for a shield. If it has been somehow modified since that date, then we would not provide a shield in the permit.

International Paper Sartell requested that the following shields be placed in the permit. These requests have been placed in the TSD with some MPCA comments.

- Shield from 40 CFR 60 Subpart Db; 40 CFR 61 Subpart E, except 61.52(b), 61.54(e); Minnesota Rules 7011.1201-1285; Minnesota Rules 7011, except 7011.0555 for No. 3 Power Boiler. (none of these requirements are used in the current permit for these units)
- Shield from 40 CFR 60 & 61 for Wickes Boiler & Bros Boiler (These requirements are not cited in the current permit for the Wickes and Bros boilers)
- Shield from 40 CFR 60.42c-60.47c, 60.48c (except 60.48c(a)(1) and 60.48c(g)); 40 CFR 60, Subpart Dc; Minnesota Rule 7011.0555 to 7011.0570 for Package Boiler. (The citations for the Package Boiler in the current permit are 40 CFR 60.48c(a) and 60.48c(g))
- Shield from 40 CFR 60 Subpart K. The facility has no petroleum storage tanks that this would apply.
- Shield from 40 CFR 60 Subpart Ka. The facility has no petroleum storage tanks that this would apply.
- Shield from 40 CFR 60 Subpart Kb. The facility has no petroleum storage tanks that this would apply.
- Shield from 40 CFR 60 Subpart BB. The facility does not utilize the Kraft pulping process.
- Shield from 40 CFR 63 Subpart ZZZZ. The facility does not have unit subject to this subpart.
- Shield from 40 CFR 63 Subpart JJJJ. The facility does not coat with produces that would make them subject to this subpart.
- Shield from 40 CFR 63 Subpart HHHHH. The facility does not do any of the activities regulated by this subpart.

4. Conclusion

Based on the information provided by Verso paper Company, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission

Permit No. 00900011-005 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Benjamin Klismith (permit writer/engineer)
David Crowell (enforcement)
Andrew Place (stack testing)
Hein Le (peer reviewer)

AQ File No. 1004A; DQ 1801, 957, 1158, 1226

Attachments: 1. PTE Calculation and Emission Increase Analysis calculation Spreadsheets
2. Facility Description and CD-01 Forms
3. November 19, 2003 EPA Letter (subpart JJJJ)