

AIR EMISSION PERMIT NO. 13700028- 004

IS ISSUED TO

City of Virginia

City of Virginia Department Public Utilities
620 South 2nd Street
Virginia, St. Louis County, MN 55792

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	Action Number	Application Date	Issue Date
Total Facility Operating Permit	001	09/18/1995	2/20/98
Major Amendment	002	9/2/1998	1/7/1999
Major Amendment	003	1/8/1999	5/6/1999
Major Amendment	004	12/24/01	see below

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

Permit Type: Federal; Part 70

Issue Date: October 31, 2002

Expiration: February 5, 2003
Title I Conditions do not expire.

Ann M. Foss
Major Facilities Section Manager
Majors and Remediation Division

for Karen A. Studders
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. Certain requirements which have been determined not to apply are listed in Table A of this permit.

Subject to the limitations in 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:

The city of Virginia Department of Public Utilities is a citizen-owned utility providing steam and electricity to businesses and residents of the local Virginia area. The department currently operates any combination of four boilers using coal and/or natural gas as fuel. The three boilers are referred to as Boiler Nos. 7, 9, and 10. Previously Boiler Nos. 7 and Boiler Nos. 10 were permitted as only natural gas-fired boilers, Boiler No. 8 was permitted to burn both coal (subbituminous and bituminous) and natural gas, and Boiler No. 9 was permitted to burn only coal (subbituminous and bituminous). In years past Boiler No. 7 was permitted to burn coal but discontinued doing so back in 1993, with the installation of Boiler No. 10.

The facility was issued a Title V total facility air emissions permit on February 5, 1998, and Amendment No. 1 to that permit was issued on December 22, 1998. Amendment No. 1 (the first amendment to the Title V permit) allowed the Utility to shut down Boiler No. 8, re-permitted coal combustion in Boiler No. 7, and permitted the venting of Boiler No. 7 through the electrostatic precipitator and stack currently used by Boiler No. 8.

Amendment No. 1 was considered a major permit amendment under Minn. R. 7007.1500, subp. 1, because the changes to the Title V permit were: 1) considered significant changes to existing monitoring, reporting, and record keeping, 2) consisted of changes made to emission limitations based on a source-specific determination of ambient impacts, and 3) consisted of changes made to underlying conditions set to avoid Prevention of Significant Deterioration (PSD) permitting.

It is important to note that new PSD permit requirements were not triggered by the addition of coal combustion to Boiler No. 7. Under 40 CFR § 52.21(b)(2)(iii)(e), the addition of a new fuel is exempt from PSD permitting as long as the unit was capable of accommodating this fuel prior to 1975 (which was the case for this boiler). The other requirement necessary to qualify for this PSD exemption is that the fuel handling system, necessary to accommodate this new fuel, had to remain in place and be capable of use with just minimal maintenance. This requirement was also met.

Amendment No. 1 eliminated the applicable requirements for Boiler No. 8 and added similar requirements for Boiler No. 7. In addition, two major changes were made to the permit. First, the Total Facility is subject to a facility-wide Nitrogen Oxide (NO_x) emission limit. That limit was set to limit total facility NO_x emissions to past actual +40 tons when Boiler No. 10 was added. While the NO_x emission limit was not changed, the emission data used in the compliance equation found in the Total Facility section of the permit was amended. The compliance equation requires emission factors for each fuel burned in each boiler. Amendment No. 1 removed the coal combustion emission factor for Boiler No. 8 and added the appropriate coal combustion emission factor for Boiler No. 7. Second, the original Title V permit contained Sulfur Dioxide (SO₂) limits for Boiler No. 7 and Boiler No. 9. The impact of SO₂ emissions on ambient air quality were remodeled as part of the permit application process because the exhaust gas dispersion parameters had changed. Boiler No. 7 will now vent to the existing Boiler No. 8 stack.

Since Boiler No. 7 is smaller and of different design than Boiler No. 8, both the exhaust gas flow rate through the stack and the SO₂ emission rate go down, while the stack temperature goes up. These changes affect the dispersion of pollutants in the atmosphere. As a result of the ambient air quality modeling, the permitted SO₂ limit when the two coal-fired boilers are simultaneously operated was reduced. The new group operating limit is 1.6 lb/MMBtu compared to the previous permit limit of 1.72 lb/MMBtu.

The existing CEM/COM requirements for Boiler No. 8 now apply to Boiler No. 7. COM requirements have been revised only to reflect recent changes in Minnesota Rules.

Amendment No. 2

This new amendment changed a Title 1 Condition contained and pertained to the requirement to shut down Boiler No. 8. Amendment No. 1 required shutting down of Boiler No. 8 within one day of issuance of the amendment and written notification of the shutdown to the MPCA within 15 days. Initially the requirement to shut down Boiler No. 8 one day after permit issuance was appropriate, but the amendment issuance process extended into the winter heating season causing the Utility to postpone their plans to vent Boiler No. 7 to Boiler No. 8's pollution control equipment until the spring of 1999. Thus the permit condition was changed to reflect the change in construction plans.

Amendment No. 3

This amendment changes the requirement to dispersion model for NO_x and PM₁₀ emissions to a requirement to just model for NO_x. Modeling information is required to be submitted for PM₁₀. This amendment also changes the dates that the NO_x modeling submittals are due.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

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
Nitrogen Oxides: less than 73.08 tons/month using 12-month Rolling Average basis.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21
Recordkeeping: by the 15th day of each month, the Permittee shall record the following information: 1) tons of coal burned in EU 001 during the previous month; 2) tons of coal burned in EU 003 during the previous month; 3) total mmcf (million cubic feet) of natural gas burned in EU 001 during the previous month; 4) total monthly NOx emissions for EU 004 and EU 005 as measured by NOx CEMS. The Permittee shall use these fuel usage records, NOx emissions data, and Equation 1 to determine monthly facility NOx emissions.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5
By the 15th day of each month the Permittee shall calculate and record the monthly NOx emissions using Equation 1: NOx emissions = EF1c(A) + EF1ng(B) + EF3c(C) + y EF1c = 0.007 (EU 001 emission factor for coal; tons NOx/ton coal combusted) EF1ng = 0.275 (EU 001 emission factor for natural gas; tons NOx/mmcf natural gas combusted) EF3c = 0.007 (EU 003 emission factor for coal; tons NOx/ton coal combusted) A = tons of coal burned in EU 001 during the month B = mmcf natural gas burned in EU 001 during the month C = tons of coal burned in EU 003 during the month y = monthly total EU 004 and EU 005 NOx emissions determined by NOx CEMS By the 15th day of each month the Permittee shall calculate and record the monthly 12-month rolling average NOx emission rate. The monthly 12-month rolling average shall be determined by summing the monthly NOx emission rates (determined using the above equation) for the previous 12 months, and dividing by 12.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 4.B.
Revision of Equation 1 Emission Factors: All Equation 1 emission factors shall be revised based on the results of each performance test. The Permittee shall use the most-recent performance test-revised emission factor for calculating emissions, upon receipt of written notification from the MPCA that the performance testing results were valid. For the interim period prior to receipt of any written MPCA notification, the Permittee shall use the factors defined above for Equation 1 in this permit.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Shutdowns: Notify the Commissioner at least 24 hours in advance of 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-2**

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Breakdowns: 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
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
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, such as for system breakdowns, repairs, calibration checks, and zero and span adjustments (as applicable). Monitoring records should reflect any such periods of process shutdown.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
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
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 recurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If you need a permit amendment, submit application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Emission Fees: due 60 days after receipt of an MPCA bill	Minn. R. 7002.0005 through Minn. R. 7002.0095
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Noise: The Permittee shall comply with noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during operation of any emission units. This is a state requirement only and is not federally enforceable.	Minn. R. 7030.0010-7030.0080
The Permittee may be required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR Part 68 which was promulgated on June 20, 1996. The rule will require each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, to design and implement an accidental release prevention program. The RMPs must be submitted to a centralized location as specified by US EPA. The Permittee may obtain the RMP submittal information at http://www.epa.gov/swercepp or by calling 1-800-424-9346. These requirements must be complied with no later than the latest of the following dates: (1) June 21, 1999; (2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or (3) The date on which a regulated substance is first present above a threshold quantity in a process.	40 CFR Part 68
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

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Subject Item: GP 001 Boilers 7 and 9 SO2 limits**Associated Items:** CE 001 Centrifugal Collector - Medium Efficiency

CE 002 Electrostatic Precipitator - High Efficiency

CE 003 Electrostatic Precipitator - High Efficiency

EU 001 Boiler #7

EU 003 Boiler #9

SV 002

SV 003

What to do	Why to do it
Sulfur Dioxide: less than or equal to 2.5 lbs/million Btu heat input using 1-Hour Average when only one of the emission units in GP 001 is combusting coal.	Minn. R. 7009.0020 to ensure facility does not cause or contribute to a violation of the sulfur dioxide ambient air standard in Minn. R. 7009.0080; meets requirements of Minn. R. 7011.0510, subp. 1
Sulfur Dioxide: less than or equal to 1.60 lbs/million Btu heat input using 1-Hour Average when both EU 001 and EU 003 are combusting coal. This SO2 limit applies individually to each emission unit.	Minn. R. 7009.0020 to ensure facility does not cause or contribute to a violation of the sulfur dioxide ambient air standard in Minn. R. 7009.0080; meets requirements of Minn. R. 7011.0510, subp. 1
Coal Combustion Monitoring: The Permittee shall record the start and stop dates and times of all coal combustion periods in EU 001 and EU 003. The Permittee may use the data from the SO2 CEM for EU 001 (on SV 002) and the SO2 CEM for EU 003 (on SV 003) to meet this recordkeeping requirement providing the CEM data continuously specifies the time and date. However, when either or both of the CEMs malfunction, the Permittee shall keep a written log of coal combustion in EU 001 and/or EU 003 in place of CEM data, during the CEM malfunction.	Minn. R. 7007.0800, subp. 4

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Subject Item: EU 001 Boiler #7**Associated Items:** CE 001 Centrifugal Collector - Medium Efficiency

CE 002 Electrostatic Precipitator - High Efficiency

GP 001 Boilers 7 and 9 SO2 limits

MR 001

MR 002

MR 006

MR 007

SV 002

What to do	Why to do it
EMISSION AND FUEL TYPE LIMITS	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
Fuels Allowed: natural gas, subbituminous coal, and bituminous coal. Coal shall not be combusted in EU 001 until EU 001 emissions are vented to CE 002 and emitted through SV 002.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Fuel Usage Recordkeeping: by the 15th day of each month, the Permittee shall record the EU 001 fuel usage (for each permitted fuel) for the previous calendar month. The monthly values shall be used in the NOx emissions calculation equation (Equation 1) in the total facility section of this permit.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5
CONTROL EQUIPMENT REQUIREMENTS	hdr
Control Equipment Operating Parameters: operate CE 002 with at least the minimum number of fields in operation during the most recent stack test that measured PM emissions less than or equal to the limit for EU 001. If the number of on-line fields in CE 002 is less than the required minimum, take corrective action as soon as possible to restore the number of online fields to at least the required minimum. Operation of CE 002 is not required when EU 001 is combusting only natural gas.	Minn. R. 7007.0800, subp. 14
Recordkeeping: once each day of operation, record the minimum number of on-line fields for CE 002. Record any corrective action taken upon completion.	Minn. R. 7007.0800, subp. 5
PERFORMANCE TESTING	hdr
Initial Performance Test: due 30 days after Resuming Operation with coal fuel. The test shall measure PM and NOx emissions while burning coal and a separate test shall be conducted to measure NOx emissions while burning natural gas. The NOx tests are for the purpose of determining the NOx emission factor (EF1) for use in Equation 1 in the total facility requirements of this permit.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; Minn. R. 7017.2020, subp. 1
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

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

<p>Boiler Alternative Operating Conditions for Performance Testing:</p> <p>Alternative Operating Conditions during testing are defined as 90% to 100% of the boiler's maximum normal (continuous) operating load or the maximum permitted operating rate, whichever is lower. The basis for this number must be included in the test plan. If testing is conducted at the alternative operating condition established, an operating limit will not be established as a result of performance testing.</p> <p>In no case will the new operating rate limit be higher than allowed by an existing permit condition.</p>	Minn. R. 7017.2025, subp. 2(A) and 3(B)
<p>Boiler Operating Conditions Not Meeting the Alternative Operating Conditions During Performance Testing:</p> <p>If performance testing is not conducted at or above the established alternative operating condition, then the boiler operating rate will be limited on an 8-hour block average based on the following:</p> <p>(1) If the results of the performance test are greater than 80% of any applicable emission limit for which compliance is demonstrated, then boiler operation will be limited to the tested operating rate.</p> <p>(2) If results are less than or equal to 80% of all applicable emission limits for which compliance is demonstrated, boiler operation will be limited to 110% of the tested operating rate.</p> <p>In no case will the new operating rate limit be higher than allowed by an existing permit condition.</p>	Minn. R. 7017.2025, subp. 3(B)
<p>STET (Short Term Emergency and Testing) Operating hours limit:</p> <p>The boiler may operate up to 40 hours per year to demonstrate the Uniform Rating of Generating Equipment (URGE) capacity and to meet emergency energy supply needs. Maintain documentation of all STET operation to demonstrate compliance with this limit. The boiler must meet emission limits during STET operation.</p>	Minn. R. 7007.0800, subp. 2
<p>STET Operation Definition that applies to Boilers that Meet or do Not Meet the Alternative Operating Condition for Performance Testing:</p> <p>If performance test results demonstrate compliance at 80% or less of any applicable emission limits for any tested pollutant, STET operation is defined as operation beyond 110% of the average operating rate achieved during that performance test.</p> <p>If performance test results demonstrate compliance at greater than 80% any applicable emission limit for any tested pollutant, STET operation is defined as operation beyond 100% of the average operating rate achieved during that performance test.</p> <p>In no case will STET operation be higher than allowed by an existing permit condition.</p>	Minn. R. 7007.0800, subp. 2
<p>The results of a performance test are not final until issuance of a review letter by MPCA, unless specified otherwise by Minn. R. 7017.2001-7017.2060.</p>	Minn. R. 7017.2020, subp. 4
CONTINUOUS MONITORING REQUIREMENTS	hdr
<p>Emission Monitoring: The Permittee shall use a COMS on SV 002 to measure opacity emissions from EU 001, upon commencing coal combustion.</p>	Minn. R. 7017.1000, subp. 1; Minn. R. 7007.0800, subp. 2
<p>COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to six-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the six-minute averaging period.</p>	Minn. R. 7007.0800, subp. 2
<p>COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks and zero and span adjustments, all COMS shall be in continuous operation while the boiler is operating (combusting fuel).</p>	Minn. R. 7007.0800, subp. 2
<p>COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the CD exceeds the twice specification of PS-1 of 40 CFR pt. 60, Appendix B.</p>	Minn. R. 7017.1000
<p>COMS Calibration Error Audit: due before end of each calendar half-year starting 12/22/1998. Conduct audits at least 3 months apart but no greater than 8 months apart.</p>	Minn. R. 7007.0800, subp. 2
<p>Emissions Monitoring: The Permittee shall use a SO2 CEMS on SV 002 to measure SO2 emissions from EU 001, upon commencing coal combustion.</p>	Minn. R. 7017.1000, subp. 1; Minn. R. 7007.0800, subp. 2

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks and zero and span adjustments, all CEMS shall be in continuous operation while the boiler is operating (combusting fuel).	Minn. R. 7007.0800, subp. 2
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.	Minn. R. 7007.0800, subp. 2; Minn. R. 7017.1000, subp. 5
CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 12/22/1998 . Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7007.0800, subp. 2
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 12/22/1998 . 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 and Appendix F.	Minn. R. 7007.0800, subp. 2
Recordkeeping: The owner or operator must retain records of all CEMS/COMS monitoring data and support information for a period of five (5) years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: City of Virginia Dept Public Utilities
Permit Number: 13700028 - 004

What to do	Why to do it
Cease Operation: due 2 days before Equipment Removal and/or Dismantlement (cease operation of EU 002 at least 2 days prior to disconnection of the EU 002 ductwork that vents emissions to CE 002). Under no circumstance shall EU 002 be operated without venting emissions to CE 002, nor shall EU 002 be operated after EU 001 commences coal combustion.	Title I Condition: 40 CFR Section 52.21(b)(3)(vi)

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Subject Item: EU 003 Boiler #9**Associated Items:** CE 003 Electrostatic Precipitator - High Efficiency

GP 001 Boilers 7 and 9 SO2 limits

MR 003

MR 004

MR 008

MR 009

SV 003

What to do	Why to do it
EMISSION AND FUEL LIMITS	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
Fuels Allowed: subbituminous coal, bituminous coal, and oily cellulose-based sorbents (including oily rags).	Minn. R. 7007.0800, subp. 2
Fuel Usage Limit: The Permittee shall not combust more than 500 pounds per year of oily cellulose-based sorbents (oily rags) in EU 003.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
Fuel Usage Recordkeeping: by the 15th day of each month the Permittee shall record the type and quantity of fuels burned in EU 003 during the previous month. The monthly records shall be used in the NOx emission calculation equation (Equation 1) in the total facility section of this permit.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5
CONTROL EQUIPMENT REQUIREMENTS	hdr
Control Equipment Operating Parameters: operate CE 003 with at least the minimum number of fields in operation during the most recent stack test that measured PM emissions less than or equal to the limit for EU 003. If the number of on-line fields in CE 003 is less than the required minimum, take corrective action as soon as possible to restore the number of online fields to at least the required minimum.	Minn. R. 7007.0800, subp. 14
Record keeping: once each day of operation, record the minimum number of on-line fields for CE 003. Record any corrective action taken upon completion.	Minn. R. 7007.0800, subp. 5
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months starting 01/31/98 to measure particulate matter emissions. The particulate matter emissions tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
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
Boiler Alternative Operating Conditions for Performance Testing: Alternative Operating Conditions during testing are defined as 90% to 100% of the boiler's maximum normal (continuous) operating load or the maximum permitted operating rate, whichever is lower. The basis for this number must be included in the test plan. If testing is conducted at the alternative operating condition established, an operating limit will not be established as a result of performance testing. In no case will the new operating rate limit be higher than allowed by an existing permit condition.	Minn. R. 7017.2025, subp. 2(A) and 3(B)

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

<p>Boiler Operating Conditions Not Meeting the Alternative Operating Conditions During Performance Testing:</p> <p>If performance testing is not conducted at or above the established alternative operating condition, then the boiler operating rate will be limited on an 8-hour block average based on the following:</p> <p>(1) If the results of the performance test are greater than 80% of any applicable emission limit for which compliance is demonstrated, then boiler operation will be limited to the tested operating rate.</p> <p>(2) If results are less than or equal to 80% of all applicable emission limits for which compliance is demonstrated, boiler operation will be limited to 110% of the tested operating rate.</p> <p>In no case will the new operating rate limit be higher than allowed by an existing permit condition.</p>	Minn. R. 7017.2025, subp. 3(B)
<p>STET (Short Term Emergency and Testing) Operating hours limit:</p> <p>The boiler may operate up to 40 hours per year to demonstrate the Uniform Rating of Generating Equipment (URGE) capacity and to meet emergency energy supply needs. Maintain documentation of all STET operation to demonstrate compliance with this limit. The boiler must meet emission limits during STET operation.</p>	Minn. R. 7007.0800, subp. 2
<p>STET Operation Definition that applies to Boilers that Meet or do Not Meet the Alternative Operating Condition for Performance Testing:</p> <p>If performance test results demonstrate compliance at 80% or less of any applicable emission limits for any tested pollutant, STET operation is defined as operation beyond 110% of the average operating rate achieved during that performance test.</p> <p>If performance test results demonstrate compliance at greater than 80% any applicable emission limit for any tested pollutant, STET operation is defined as operation beyond 100% of the average operating rate achieved during that performance test.</p> <p>In no case will STET operation be higher than allowed by an existing permit condition.</p>	Minn. R. 7007.0800, subp. 2
<p>The results of a performance test are not final until issuance of a review letter by MPCA, unless specified otherwise by Minn. R. 7017.2001-7017.2060.</p>	Minn. R. 7017.2020, subp. 4
CONTINUOUS MONITORING REQUIREMENTS	hdr
<p>Emission Monitoring: The Permittee shall use a COMS to measure opacity emissions from EU 003.</p>	Minn. R. 7017.1000, subp. 1; Minn. R. 7007.0800, subp. 2
<p>COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to six-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the six-minute averaging period.</p>	Minn. R. 7007.0800, subp. 2
<p>COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks and zero and span adjustments, all COMS shall be in continuous operation while the boiler is operating (combusting fuel).</p>	Minn. R. 7007.0800, subp. 2
<p>COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the calibration drift (CD) exceeds the twice specification of PS-1 of 40 CFR pt. 60, Appendix B.</p>	Minn. R. 7017.1000
<p>COMS Calibration Error Audit: due before end of each calendar half-year starting 12/22/1998. Conduct audits at least 3 months apart but no greater than 8 months apart.</p>	Minn. R. 7007.0800, subp. 2
<p>Emissions Monitoring: The Permittee shall use a SO2 CEMS to measure SO2 emissions from EU 003.</p>	Minn. R. 7017.1000, subp. 1; Minn. R. 7007.0800, subp. 2
<p>CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks and zero and span adjustments, all CEMS shall be in continuous operation while the boiler is operating (combusting fuel).</p>	Minn. R. 7007.0800, subp. 2
<p>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.</p>	Minn. R. 7007.0800, subp. 2; Minn. R. 7017.1000, subp. 5
<p>CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 12/22/1998. Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F.</p>	Minn. R. 7007.0800, subp. 2

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 12/22/1998 . 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 and Appendix F.	Minn. R. 7007.0800, subp. 2
Recordkeeping: The owner or operator must retain records of all CEMS/COMS monitoring data and support information for a period of five (5) years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7007.0800, subp. 5

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

10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

Subject Item: EU 004 Boiler #10**Associated Items:** CE 004 Modified Furnace or Burner Design

CE 005 Flue Gas Recirculation

CE 006 Low Excess - Air Firing

MR 005

MR 010

SV 004

What to do	Why to do it
EMISSION AND FUEL TYPE LIMITS	hdr
Total Particulate Matter: less than or equal to 0.03 lbs/million Btu heat input	40 CFR Section 60.42a(a)(1)
Opacity: less than or equal to 20 percent opacity using 6 Minute Average except for one 6-minute period per hour of not more than 27 percent opacity.	40 CFR Section 60.42a(b)
Sulfur Dioxide: less than or equal to 0.20 lbs/million Btu heat input using 30-day Rolling Average	40 CFR Section 60.43a(b)(2)
Nitrogen Oxides: less than or equal to 0.10 lbs/million Btu heat input using 30-day Rolling Average	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; meets requirements of 40 CFR Section 60.44a(a)(1)
Fuels Allowed: EU 004 fuel is restricted to natural gas only.	Minn. R. 7007.0800, subp 2
CONTINUOUS EMISSIONS MONITORING	hdr
Emissions Monitoring: The Permittee shall use a NOx CEMS to measure NOx emissions from EU 004, and record the output of the system.	Title I Condition: to limit NOx emissions increase to less than the significant level in 40 CFR Section 52.21; ensures compliance with 40 CFR Section 60.47a(c)
Emissions Monitoring: The owner or operator shall operate and maintain a CO2 or O2 CEMS at the location of the NOx CEMS, and record the output of the system.	40 CFR Section 60.47a(d)
CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks and zero and span adjustments, all CEMS shall be in continuous operation while the boiler is operating (combusting fuel).	40 CFR Section 60.47a(e); 40 CFR Section 60.13(e)
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.	40 CFR Section 60.48a(d); 40 CFR pt. 60, Appendix F, section 4.1; 40 CFR Section 60.13(d)(1)
CEMS Cylinder Gas Audit (CGA): due before end of each calendar half-year starting 12/22/1998 . Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F.	40 CFR Section 60.48a(d); 40 CFR pt. 60, Appendix F, section 5.1.2
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 12/22/1998 . 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 and Appendix F.	40 CFR Section 60.48a(d); 40 CFR pt. 60, Appendix F, section 5.1.1
RECORDKEEPING	hdr
Recordkeeping: The owner or operator must retain records of all CEMS/COMS monitoring data and support information for a period of five (5) years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	40 CFR Section 60.7(f); Minn. R. 7007.0800, subp. 5

TABLE B: SUBMITTALS

B-1 10/31/02

Facility Name: City of Virginia Dept Public Utilities
Permit Number: 13700028 - 004

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

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

Send any application for a permit or permit amendment to:

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

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

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

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

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

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

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**B-2** 10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Information	due before 01/05/2003. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for PM10). This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Computer Dispersion Modeling Protocol	due before 09/15/2002 for NOx dispersion modeling. The protocol will describe the proposed modeling methodology and input data in accordance with all requirements of 40 CFR pt. 51, App. W. The protocol may be based on proposed operating conditions under the next permit term if necessary.	Total Facility
Computer Dispersion Modeling Results	due before 01/05/2003 for NOx dispersion modeling.	Total Facility
Fugitive Control Plan	due 30 days after permit issuance (for permit number 13700028-002). The plan shall identify all fugitive emission sources, primary and contingent control measures, and records kept, if any.	Total Facility
Notification	due 15 days after Cease Operation (notification due no later than 15 days after shutdown of EU 002).	EU002
Relative Accuracy Test Audit (RATA) Notification	due 30 days before CEMS Relative Accuracy Test Audit (RATA)	EU001, EU003, EU004
Testing Frequency Plan	due 60 days after Initial Performance Test for PM and NOx emissions. The plan shall specify a testing frequency using the initial PM and NOx performance test data and MPCA guidance. Future performance tests based on year (12-month), 36-month, and 60-month intervals, or as applicable shall be required on written approval by MPCA per Minn. R. 7017.2020, subp. 1.	EU001

TABLE B: RECURRENT SUBMITTALS**B-3** 10/31/02

Facility Name: City of Virginia Dept Public Utilities

Permit Number: 13700028 - 004

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 starting 02/05/1998 (Submit Deviations Reporting Form DRF-1 as amended) for sulfur dioxide and opacity. The EERs shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdowns, and malfunctions.	EU001, EU003
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter starting 12/22/1998 (Submit Deviations Reporting Form DRF-1 as amended) for NOx emissions. The EERs shall indicate all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdowns, and malfunctions.	EU004
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar half-year following COMS Calibration Error Audit.	EU001, EU003
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar half-year following CEMS Cylinder Gas Audit (CGA).	EU001, EU003
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar half-year following CEMS Cylinder Gas Audit (CGA).	EU004
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 02/05/1998	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 02/05/1998 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year starting 02/05/1998	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA)	EU001
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA)	EU004
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).	EU003

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 13700028-004

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1. General Information

1.1. Applicant and Stationary Source Location:

Owner/Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 4911)
City of Virginia Dept. of Public Utilities 620 South Second Street P.O. Box 1048 Virginia, Minnesota 55792	City of Virginia Dept. of Public Utilities 620 South Second Street P.O. Box 1048 Virginia, Minnesota 55792

Contact: Mr. Douglas J. Ganoe, Director of Operations

1.2. Description Of The Facility

The City of Virginia Department of Public Utilities is a citizen-owned utility providing steam and electricity to businesses and residents of the local Virginia area. The department currently operates any combination of three boilers using coal and/or natural gas as fuel. The four boilers are referred to as Boiler No. 7, 9, and No. 10. Currently Boilers No. 7 and No. 10 are natural gas-fired boilers, Boiler No. 7 can also burn both coal (subbituminous and bituminous), and Boiler No. 9 can burn only coal (subbituminous and bituminous). Boiler 8 is physically disconnected from the Utility System.

1.3 Description of the Activities Allowed By This Permit Action

This plan changes the dispersion modeling requirements in the permit. The initial total facility permit required dispersion modeling of NOx and PM10 emissions. This amendment changes the requirement to NOx modeling only, and requires submittal of modeling data as specified by MPCA guidance for Modeling Information Requests.

2. Regulatory and/or Statutory Basis

The MPCA currently requires certain facilities to perform dispersion modeling. Modeling is required for a permit that allows total facility potential emissions of 100 tpy or more of PM10, SO2 and/or NOx and the most recent AQ/QC'd total facility actual emissions are greater than

Permit Action Number:

Date: 2/21/2007

equal to 100 tpy, 250 tpy, or 1000 tpy of PM10, SO2 or NOx respectively. If the actual emission threshold is exceeded for only one of the pollutants, full modeling would still be required for each of the three pollutants for which the total facility potential emissions exceeds 100 tpy.

The actual emission threshold is exceeded for SO2 only, however, as stated above, if the actual emission threshold is exceeded for only one of the pollutants, full modeling would still be required.

Accordingly, the permit does not change the requirement for Virginia to perform dispersion modeling for NOx emissions (actual emissions are over 400 tpy.)

However, since the PM10 potential emissions are just slightly over the threshold, actual PM10 emissions are only about 20 tpy, and the facility has no ground level fugitive emission sources, the permit requirement for PM10 dispersion modeling is being waived. Instead, the company will be required to submit modeling information only.

3. Conclusion

Based on the information provided by Virginia Public Utilities, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 13700028-004 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: Jenny L. Reinertsen, Bob Beresford