

AIR EMISSION PERMIT NO. 06700005- 004
Major Amendment

IS ISSUED TO

Willmar Municipal Utilities

WILLMAR MUNICIPAL UTILITIES
710 Benson Avenue Southwest
Willmar, Kandiyohi County, MN 56201

The emission units, control equipment and emission stacks at the stationary source authorized in this permit amendment are as described in the Permit Applications Table.

This permit amendment, supersedes Air Emission Permit No. **06700005- 003**, and authorizes the Permittee to operate and modify 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.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the SIP under 40 CFR § 52.1220 and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: Federal; Pt 70/Major for NSR;

Operating Permit Issue Date: September 5, 2007

Major Amendment Issue Date: February 25, 2009

Expiration Date: 09/05/2012 – Title I Conditions do not expire.

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

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit Reissuance	05/05/2006	003
Major Amendment	11/18/08 Revised 12/30/08	004

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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:

Permit Action 001 (Total Facility Permit):

Willmar Municipal Utilities is an electricity and steam generation facility. The facility supplies electricity and steam for heating to residents and businesses of the City of Willmar. Emission sources at the facility include four boilers. Boiler #1 is coal fired; Boiler #2 is natural gas fired; Boiler #3 is coal and natural gas fired; and Boiler #4 is fired by natural gas and fuel oil. Boiler #1 is used only as a back up unit, on an emergency basis. Fugitive sources at the facility include coal and ash handling activities.

The facility is an existing major source under New Source Review/Prevention of Significant Deterioration.

Permit Action 002 (Major Amendment):

Permit Action 002 is a MPCA-initiated major amendment under Minn. R. 7007.1600, subp. 1(D) – mandatory reopening that is needed in order to assure compliance with applicable requirements. The amendment incorporates new steam flow limits for Boiler No. 3 and Boiler No. 4 set as a result of performance testing conducted under Minn. R. 7017.2025, subp. 3. This information was sent to the Permittee in a Notice of Compliance letter dated April 7, 2004.

Permit Action 003 (Reissuance):

Willmar Municipal Utilities is an electricity and steam generating facility. The facility supplies electricity and steam for heating to residents and businesses of the City of Willmar. There are four boilers at this facility; boiler one is not operational, boiler two is natural gas, boiler three is coal and the main boiler, and boiler four in natural gas and generates steam.

This permit includes a major amendment which changes the allowable pressure drop change for Boiler 003 (EU 003) from 2-3 inches of water to 1-3 inches of water. This permit establishes coal usage limits (EU 003), a fuel analysis requirement (EU 003), and steam flow monitoring (EU 003 & 004). The fuel oil tank was removed from the facility and the Insignificant Activities Table. Several citations were updated, some clerical errors were corrected, and information was updated in the facility description.

In the previously issued Title V permit, Boiler 2 (EU 002) had a PM limit of .6 lb/MMBtu, and a performance testing requirement based on this limit for PM and opacity. The unit is limited to combusting only natural gas, and the actual PM emissions are significantly lower than the limit. (.015 lb/MMBtu and 0.012 lb/MMBtu heat input from the 8/3/2001 and 4/20/2007 Notices of Compliance, respectively). The performance test requirement for PM and Opacity was removed. EU 002 still has a PM limit of 0.6 lb/MMBtu and is limited to emitting less than 5.74 tons per year of PM.

The facility is a major source under 40 CFR § 52.21 (Prevention of Significant Deterioration), a synthetic minor for HAPs, and considered a major source under the federal operation permits program (40 CFR pt. 70).

Permit Action 004 (Major Amendment):

This permit action authorizes the use of limited amounts of corn cobs and other defined biomass as supplemental renewable fuel source for Boiler No.3. The limited amounts of biomass will be used to conduct trial burns to evaluate operational feasibility and emission factors.

Permit No. 06700005-003 included federally enforceable restrictions on fuel usage and fuel type for Boiler 3. It allowed natural gas and limited amounts of subbituminous coal. This permit amendment authorizes up to 500 tons of defined biomass as a cumulative total over the life of the permit amendment. For the test burns, the biomass would be introduced with air through an existing observation port near the rear of the boiler grate. No modifications to the boiler are necessary for short term testing purposes.

The facility will temporarily add equipment to receive, handle and store biomass. Corn cobs (the principally-desired item for testing) and other authorized biomass are being harvested and stored at an off-site location. WMU will transport limited quantities (e.g., sufficient for 1-2 days of test burns) to the WMU power plant site via dump trucks or farm trucks. The cobs and other authorized biomass will be stored in an outdoor pile at the plant site. Authorized biomass will be moved from the on-site pile to the plant via front end loader. The means of getting the biomass into the plant will involve the addition of temporary equipment (e.g. use of a silage blower and temporary ductwork up to a boiler observation port, use of a portable electric screw conveyor through a plant opening up to the desired boiler elevation). These temporary emission units are being added to the list of insignificant activities as their associated emissions are expected to be no higher than the emissions associated with coal handling at the facility.

Synthetic minor limits on biomass test burns will ensure that this modification remains non-major under NSR and that the entire facility remains non-major under 40 CFR part 63.

This permit action incorporates a mandatory permit reopening action to set limits for Boiler No. 4 pursuant to Minn. R. 7017.2025, subp. 3. The Letter of Compliance dated 3/20/08 served as the 30-day notice to the Permittee of the MPCA's intent to amend the permit. No other permit amendments or notifications are authorized or incorporated into this permit action.

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 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
SOURCE SPECIFIC REQUIREMENTS	hdr
Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 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. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0100; Minn. R. 7007.0800, subp. 2; Minn. R. 7011.0150; Minn. R. 7009.0020
Parameters Used in Modeling: The stack heights, emission rates, and other parameters used in the modeling (from 1991), are listed in Appendix B of this permit. The Permittee must submit to the Commissioner for approval any revisions of these parameters and must wait for a written approval before making such changes. The information submitted must include, at a minimum, the locations, heights and diameters of the stacks, locations and dimensions of nearby buildings, the velocity and temperatures of the gases emitted, and the emission rates. The plume dispersion characteristics due to the revisions of the information must be equivalent to or better than the dispersion characteristics modeled. The Permittee shall demonstrate this equivalency in the proposal. This is a state only requirement and is not enforceable by the EPA or citizens under the CAA.	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
If the information does not demonstrate equivalent or better dispersion characteristics, or if a conclusion cannot readily be made about the dispersion, the Permittee must remodel. For changes that do not involve an increase in an SO2 emission rate and that do not require a permit amendment, this proposal must be submitted as soon as practicable, but no less than 60 days before beginning actual construction of the stack or associated emission unit. For changes involving increases in SO2 emission rates and that require a minor permit amendment, the proposal must be submitted as soon as practicable, but no less than 60 days before beginning actual construction of the stack or associated emission unit. For changes involving increases in SO2 emission rates and that require a permit amendment other than a minor amendment, the proposal must be submitted with the permit application. This is a state only requirement and is not enforceable by the EPA or citizens under the CAA.	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
DETERMINING IF A PROJECT/MOD IS SUBJECT TO NEW SOURCE REVIEW	hdr
These requirements apply where there is a reasonable possibility that a proposed project, analyzed using the actual-to-projected-actual (ATPA) test and found to not be part of a major modification, may result in a significant emissions increase. If the ATPA test is not used for a particular project, or if there is not a reasonable possibility that the proposed project could result in a significant emissions increase, then these requirements do not apply to that project. Even though a particular modification is not subject to New Source Review, 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) and Minn. R. 7007.3000

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

<p>Preconstruction Documentation -- Before beginning actual construction on a project, the Permittee shall document the following information:</p> <ol style="list-style-type: none"> 1. A description of the project 2. Identification of the emission unit(s) whose emissions of an NSR pollutant could be affected 3. A description of the applicability test used to determine that the project is not a major modification for any regulated NSR pollutant, including the baseline actual emissions, the potential emissions, the projected actual emissions, the amount of emissions excluded due to increases not associated with the modification and that the unit(s) 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. <p>The Permittee shall maintain records of this documentation.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>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. The Permittee shall calculate and maintain a record of the sum of the actual and potential (if 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.</p>	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>For any project which includes any EUSGU, the Permittee must submit an annual report to the Agency, within 60 days after the end of the calendar year. The report shall contain:</p> <ol style="list-style-type: none"> a. The name and ID number of the facility, and the name and telephone number of the facility contact person b. The quantified annual emissions analyzed using the ATPA test, plus the potential emissions associated with the same project and analyzed using potential emissions c. Any other information, such as an explanation as to why the summed emissions differ from the preconstruction projection, if that is the case. 	<p>Title I Condition: 40 CFR Section 52.21(r)(6) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
<p>For any project which does not include any EUSGU, the Permittee must submit a report to the Agency if the annual summed (actual plus potential, if applicable) 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> <ol style="list-style-type: none"> a. The name and ID number of the facility, and the name and telephone number of the facility contact person b. The annual emissions (actual plus potential, if any part of the project was analyzed using potential emissions) for each pollutant for which the preconstruction projection and significant emissions rate is exceeded. 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) and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 4 & 5</p>
OPERATIONAL REQUIREMENTS	hdr
<p>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.</p>	<p>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.</p>
<p>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.</p>	<p>Minn. R. 7011.0020</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)</p>
<p>Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.</p>	<p>Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)</p>

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Allowable biomass material (ABM) that has an approval from the MPCA beneficial use of solid waste program in the form of a Standing Beneficial Use Determination when it is used as fuel, must be managed in accordance with Minn. R. 7035.2855, subps. 2, 6, and 7 prior to use as a fuel. These requirements do not apply to on-site storage of agricultural crop residues to be used as fuel and that are traditionally managed by leaving on fields.	Minn. R. 7035.2855
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.	Minn. R. 7017.2025, subp. 3
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
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)

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

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)
If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. These records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.	Minn. R. 7007.1200, subp. 4
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
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
Application for Permit Reissuance: due 180 days before expiration of existing permit.	Minn. R. 7007.0400, subp. 2
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner. The accumulated amount of all ABM combusted in any year must be included in the Emission Inventory Reports.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Willmar Municipal Utilities
Permit Number: 06700005 - 004

Subject Item: EU 001 Boiler No. 1

What to do	Why to do it
This unit is currently inoperable. Prior to any repairs and/or modifications to restore the unit to operable status (including, but not limited to the additional natural gas firing capabilities), an appropriate permit amendment shall be applied for and/or obtained according to rules in effect at the time of the change.	Minn. R. 7007.1150(B)

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

Subject Item: EU 002 Boiler No. 2**Associated Items:** SV 002 Boiler 2

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity using 6-minute Average except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Nitrogen Oxides: less than or equal to 0.1 lbs/million Btu heat input using 3-hour block average	Title I Condition: To avoid classification of a previous modification as major under 40 CFR Section 52.21 and Minn. R. 7007.3000
OPERATIONAL REQUIREMENTS	hdr
Fuel Types: Limited to natural gas only.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Fuel Usage: less than or equal to 750 million cubic feet/year using 12-month Rolling Sum of natural gas	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 36 months starting 07/31/2003 to measure NOX. The next test is due on 7/31/09 and every 36 months thereafter.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7017.2020, subp. 1
RECORDKEEPING	hdr
Daily Recordkeeping: Each day, record the quantity of natural gas burned in Boiler #2 during the previous day.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Monthly Recordkeeping: By the 15th of each month, record the quantity of natural gas burned in Boiler #2 during the previous month, and calculate and record the latest 12-month rolling sum. The 12-month rolling sum is calculated by adding the most recent month's natural gas usage in Boiler #2 to the previous 11 months' natural gas usage.	Minn. R. 7007.0800, subp. 4 and 5

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

Subject Item: EU 003 Boiler No. 3**Associated Items:** CE 003 Multiple Cyclone w/o Fly Ash Reinjection - Most Multiclones

MR 001 Boiler 3 - Opacity

MR 002 Boiler 3 - SO₂

SV 003 Boiler 3

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Sulfur Dioxide: less than or equal to 4.0 lbs/million Btu heat input when combusting coal.	Minn. R. 7011.0510, subp. 1
Sulfur Dioxide: less than or equal to 442 lbs/hour using 1-Hour Average . This is a State-only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7009.0020- 7009.0080
Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input using 1-Hour Average . This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7009.0020 - 7009.0080
Opacity: less than or equal to 20 percent opacity using 6-minute Average except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2; 40 CFR Section 64.7
OPERATIONAL REQUIREMENTS	hdr
Fuel Usage: Normal operating conditions: limited to natural gas and subbituminous coal only. Test burn conditions: limited to natural gas, subbituminous coal, corn cobs, corn stover, clean unadulterated wood-based biomass materials (wood chips, bark and sawdust) only. The corn cobs, corn stover and clean unadulterated wood-based biomass materials shall hereafter be referred to as allowable biomass materials or ABM for the purpose of this permit. Chemically processed or chemically-treated biomass materials are not permissible for use as a fuel.	Minn. R. 7007.0800, subp. 4 and 5
Fuel Usage: less than or equal to 75,000 tons/year using 12-month Rolling Sum for coal combustion in EU 003 to be calculated by the 15th day of each month for the previous 12-month period, calculated by adding the most recent month's coal usage in Boiler #3 to the previous 11 months' coal usage.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; Minn. R. 7007.0800 subp 2.
Fuel Analysis: due 30 days after end of each calendar year following Initial Fuel Analysis starting in 2008. Coal analysis must include, but is not limited to, Heating Value, Total Chlorine, Total Fluorine, Mercury, and Manganese. If the concentration of Total Fluorine or Total Chlorine is greater than 114 mg/Kg then a major amendment application must be submitted within 30 days.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; Minn. R. 7007.0800 subp 2.
Steam Flow: less than or equal to 107,434 lbs/hour using 8-hour Block Average unless a new maximum 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 for PM emissions was demonstrated. Downtime of 15 or more minutes is not to be included as operating time. This limit does not apply when combusting only natural gas.	Minn. R. 7017.2025, subp. 3
ABM allowed. The only ABM authorized in this permit for trial burns is: - Agricultural crop residues traditionally managed by leaving on fields (such as corn cobs and stover), which are materials that MPCA has determined are not considered a solid waste, and - Unadulterated wood, wood chips, bark, or sawdust materials that already have an approval from the MPCAs beneficial use of solid waste program in the form of a Standing Beneficial Use Determination (SBUD) Biomass not authorized to be burned by this permit is material that could be considered solid waste and therefore would require to obtain a Case Specific Beneficial Use Determination (CSBUD) from the MPCA pursuant to Minn. R. 7035.2860, subp 2.	Minn. R. 7035.2860, subp. 4(a)

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

Alternative Fuel Testing Authorization: The Permittee is authorized to conduct any number of test burns until September 5, 2012, using ABM as supplemental, renewable fuel mixture. The maximum ABM permitted under this paragraph shall be a cumulative total of 500 tons. When combusted under this paragraph, ABM may be fired individually or in any mixture of two or more ABM. ABM may be fired at any as received moisture content, but shall always be co-fired with subbituminous coal. Natural gas may be added for evaluation and testing purposes.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 63 and 40 CFR pt. 52.21, Minn. R. 7007.0800, subp. 4 and 5.
Alternative Fuel Testing Authorization: ABM Test burns may be conducted alone (e.g. to evaluate fuel handling, combustion characteristics, or ash properties, etc.) or in conjunction with stack performance testing to generate pollutant emission factors. If stack performance testing is conducted during an ABM test burn, all Performance Testing requirements of this permit shall apply to such tests.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 63 and 40 CFR pt. 52.21, Minn. R. 7007.0800, subp. 4 and 5, Minn. R. 70.17.2030, subp. 1-4, 7017.2018, and Minn. R. 7017.2035, subp. 1-2.
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 36 months starting 07/31/2003 to measure PM. The next test is due on or before 07/31/2009 and every 36 months thereafter.	Minn. R. 7017.2020, subp. 1
ABM Stack Performance Testing: for PM, following the procedures and reference methods approved by MPCA in the test plan. The test plan, which will define anticipated operating scenarios, will be submitted to determine at what operating load(s), fuel types and rates, and pollution control condition compliance demonstration will be required. COM and CEM records during the performance test will be submitted with the appropriate averaging times reported for compliance demonstration. The performance test shall include MPCA-approved sampling and analysis of all solid fuels combusted during the test for moisture, proximate analysis, and ultimate analysis. Until the time the permittee obtains permanent authorization to combust ABM as part of their normal operation, the test results under this paragraph will not be used to set limits pursuant to Minn. R. 7017.2025, subp. 3, unless the results show non-compliance with any of the requirements in Minn. R. 7011.0510.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 52.21, Minn. R. 7011.0510, Minn. R. 7007.0800, subp. 2, 4 and 5.
ABM Stack Performance Testing: for PM10, PM2.5, NOx, VOC and CO following the procedures and reference methods approved by MPCA in the test plan. The test plan, which will define anticipated operating scenarios, will be submitted to determine at what operating load(s), fuel types and rates, and pollution control condition compliance demonstration will be required. CEM and COM records during the performance test will be submitted with the appropriate averaging times reported for correlation with PM10 and PM2.5 test results. The performance test shall include MPCA-approved sampling and analysis of all solid fuels combusted during the test for moisture, proximate and ultimate analysis. Until the time the permittee obtains permanent authorization to combust ABM as part of their normal operation, the test results under this paragraph will not be used to set limits pursuant to Minn. R. 7017.2025, subp. 3.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 52.21, Minn. R. 7007.0800, subp. 2, 4 and 5
ABM Stack Performance Testing: HCl and HF following the procedures and reference methods approved by MPCA in the test plan. The test plan, which will define anticipated operating scenarios, will be submitted to determine at what operating load(s), fuel types and rates, and pollution control condition compliance demonstration will be required. The performance test shall include MPCA-approved sampling and analysis of all solid fuels combusted during the test for moisture, proximate analysis, Total Chlorine, Total Fluorine, Mercury, alkalinity and ultimate analysis. Until the time the Permittee obtains permanent authorization to combust ABM as part of their normal operation, the test results under this paragraph will not be used to set limits pursuant to Minn. R. 7017.2025, subp. 3.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 63 and 40 CFR pt. 52.21, Minn. R. 7007.0800, subp. 4 and 5
CONTROL EQUIPMENT REQUIREMENTS (CE003)	hdr
The Permittee shall operate and maintain the associated control device at all times that the boiler is combusting coal.	Minn. R. 7007.0800 subps. 2 and 16(J)
The Permittee shall operate and maintain the control device 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; 40 CFR Section 64.3; Minn. R. 7011.0075, subp. 2
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. If the pressure drop is outside the specified pressure drop range limit, this shall be considered a deviation that must be reported in the Semiannual Deviations Report listed in Table B of this permit.	Minn. R. 7007.0800, subp. 4, 5 and 14; 40 CFR Section 64.3; Minn. R. 7017.0200
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 80 percent control efficiency	Minn. R. 7011.0065, subp. 1(A)

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 80 percent control efficiency	Minn. R. 7011.0065, subp. 1(A)
Lead: greater than or equal to 40 percent control efficiency (The operation of this piece of control equipment is not necessary in order for the process to meet any applicable emissions limits for Lead. However, the Permittee wishes to take credit for its operation for the purposes of reporting actual emissions for emission inventory. Therefore, in order for the Lead to be considered controlled for the purposes of emissions inventory, the control device must comply with the requirements of this permit during the time credit for control is taken.)	Minn. Stat. 116.07, subd. 4a; Equipment used under Minn. R. 7019.3020 (F) and Minn. R. 7019.3050
Pressure Drop: greater than or equal to 1 inches of water column and less than or equal to 3.0 inches of water column	Minn. R. 7011.0080; 40 CFR Section 64.7
Recordkeeping of Pressure Drop. The pressure drop shall be measured manually at least once every 8 hours each operating day. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit. Recorded values outside the pressure drop range specified in this permit are considered Deviations as defined by Minn. R. 7007.0100, subp. 8a.	Minn. R. 7011.0080; 40 CFR Section 64.3; Minn. R. 7017.0200
Pressure Drop Monitoring: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the Permittee shall continuously monitor the pressure drop across the Multiclone (CE 003) when Boiler 003 (EU 003) is in operation. Monitoring data shall be used in assessing the control device operation as required by 40 CFR Section 64.7(c).	40 CFR Section 64.7(c); Minn. R. 7017.0200; Minn. R. 7011.0075, subp. 5(b)
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded opacity is above 20 percent; - the recorded pressure drop is outside the required operating range; or - the Multiclone (CE 003) 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 Multiclone. The Permittee shall keep a record of the type and date of any corrective action taken.	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, including maintaining necessary parts for routine repairs of the monitoring equipment, when the monitored multiclone is in operation.	40 CFR Section 64.7(b); Minn. R. 7017.0200
The Permittee shall calibrate each 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 exceedance (as defined in 40 CFR Section 64.1) 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 changes.	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 exceedances (as defined in 40 CFR Section 64.1), as applicable, and the corrective actions 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
CEMS and COMS REQUIREMENTS (MR001 and MR002)	hdr
Emissions Monitoring: The owner or operator shall use a CEMS to measure SO2 emissions and a COMS to measure opacity emissions from EU003.	(CEMS & COMS) Minn. R. 7017.1006; (COMS) Minn. R. 7011.1260, subp. 3; 40 CFR Section 64.7(c); Minn. R. 7017.0200

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

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. 7017.1170, subp. 3
Cylinder Gas Audit: due before end of each calendar half-year starting 09/05/2007 . Conduct CGA at least 3 months apart and 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
Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar half-year following Cylinder Gas Audit (CGA).	Minn. R. 7017.1180, subp. 1
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year starting 09/05/2007 . 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. 7017.1170, subp. 5
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA).	Minn. R. 7017.1180, subp. 2
Relative Accuracy Test Audit (RATA) Results Summary: due 30 days after end of each calendar quarter in which the CEMS RATA was conducted.	Minn. R. 7017.1180, subp. 3
CEMS Continuous Operation: CEMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. A CEMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime as listed in items A, B, C, and D of Minn. R. 7017.1090, subp. 2.	Minn. R. 7017.1090, subp. 1
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 twice the specification of PS-1 of 40 CFR pt. 60, Appendix B.	Minn. R. 7017.1210, subp. 2; 40 CFR Section 60.13(d)
COMS Calibration Error Audit: due before end of each calendar half-year starting 09/05/2007 . Conduct three point calibration error audits at least 3 months apart but no greater than 8 months apart. Filter values used shall correspond to approximately 11%, 20%, and 37% opacity.	Minn. R. 7017.1210, subp. 3
COMS Calibration Error Audit Results Summary: due 30 days after end of each calendar half-year following COMS Calibration Error Audit.	Minn. R. 7017.1220
COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to 6 minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the 6 minute averaging period.	Minn. R. 7017.1200, subp. 1 , 2, & 3 40 CFR Section 60.13(e)(1); 40 CFR Section 60.13(h); 40 CFR Section 64.7(c); Minn. R. 7017.0200
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 40 CFR pt. 60, Appendix F, section 3.	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
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record, and maintain the total quantity of all coal used at the facility. This shall be based on written usage logs.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21; Minn. R. 7007.0800 subps. 4 and 5
Monthly Recordkeeping: By the 15th day of each month, calculate and record the coal usage for the previous month and the previous 12-month period. The 12-month rolling sum is calculated by adding the most recent month's coal usage in Boiler #3 to the previous 11 months' coal usage.	Minn. R. 7007.0800 subps. 4 and 5
Steam Flow: Each day of operation, calculate and record the steam production rate for each 8-hour Block Average. Divide the total quantity of steam flow in each 8-hour block by the total operating time in the 8-hour block. Down time of 15 or more minutes is not to be included as operating time.	Minn. R. 7007.0800, subps. 4 and 5
Recordkeeping: Calculate, record and maintain the total usage of ABM for all test burns, whether or not stack performance testing is conducted. For each ABM test burn, record the total weight, and type(s) of ABM fired, approximate moisture content(s) of each type of ABM fired, hourly mass rate and heat input of ABM and coal, and heat input of natural gas (if fired) during the test burn. Record the starting and end times of the ABM test burn and indicate whether the test burn was conducted in conjunction with stack performance testing.	Title I Condition: to avoid classification as a major source under 40 CFR pt. 63 and 40 CFR pt. 52.21, Minn. R. 7007.0800, subp. 4 and 5.

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

REPORTS / SUBMITTALS	hdr
The accumulated amount of all ABM combusted in any year must be included in the Emission Inventory Reports.	Minn R. 7019.3000 through Minn. R. 7019.3100
Final ABM Fuel Usage Report. The permittee shall notify the MPCA within 30 days of when it reached the 500 tons limit on ABM authorized for test burns by this permit action.	Minn. R. 7007.0800, subp. 2

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

02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

Subject Item: EU 004 Boiler No. 4**Associated Items: SV 004 Boiler 4**

What to do	Why to do it
EMISSION LIMITS	hdr
Nitrogen Oxides: less than or equal to 0.2 lbs/million Btu heat input whenever fuel oil is combusted.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
Nitrogen Oxides: less than or equal to 0.15 lbs/million Btu heat input whenever natural gas is combusted.	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity using 6-minute Average except for one six-minute period per hour of not more than 27 percent opacity. This limit does not apply during periods of startup, shutdown, or malfunction.	40 CFR Section 60.43c(c); Minn. R. 7011.0570
OPERATIONAL LIMITS	hdr
Fuel Usage: limited to natural gas or fuel oil only.	Minn. R. 7007.0800, subp. 4 and 5
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight sulfur in fuel oil.	40 CFR Section 60.42c(d)
Fuel Usage: less than or equal to 261,143 gallons/year using 12-month Rolling Sum Fuel Oil	Title I Condition: To avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Natural Gas Fuel Usage: less than or equal to 463 million cubic feet/year using 12-month Rolling Sum	Title I Condition: To avoid classification of as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Steam Flow: less than or equal to 50,600 lbs/hour using 8-hour Block Average unless a new maximum 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 for NOx emissions was demonstrated while burning natural gas. Downtime of 15 or more minutes is not to be included as operating time.	Minn. R. 7017.2025, subp. 3
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 36 months starting 07/31/2003 to measure NOx emissions while combusting natural gas. The next test is due on or before 7/31/09 and every 36 months thereafter.	Title I Condition: Monitoring of limit taken to avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1
Performance Test: due 180 days after Startup of fuel oil combustion, to measure NOx emissions while combusting fuel oil, but no later than 60 days after reaching maximum capacity.	Title I Condition: Monitoring of limit taken to avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7017.2020, subp. 1
Performance Test: due 180 days after Startup combusting fuel oil, not to exceed 60 days after reaching maximum capacity while burning fuel oil, to measure opacity emissions while combusting fuel oil.	40 CFR Section 60.8(a); Minn. R. 7017.2020, subp. 1
MONITORING	hdr
Maintain records of the amount of each type of fuel combusted each month.	Title I Condition: Monitoring for limit taken to avoid classification as major modification under 40 CFR Section 52.21; 40 CFR Section 60.48c(g) & (i); Minn. R. 7007.0800, subp. 5
Fuel Oil Usage: By the 15th day of each month, calculate and record the new 12-month rolling sum of fuel oil used.	Title I Condition: Monitoring for limit taken to avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Natural Gas Usage: By the 15th day of each month, calculate and record the new 12-month rolling sum of natural gas used.	Title I Condition: Monitoring for limit taken to avoid classification as major modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Fuel Supplier Certification: for each delivery of distillate fuel oil, the owner/operator shall obtain from the fuel supplier a written certification including: (i) The name of the fuel supplier, and (ii) a statement from the oil supplier that the fuel oil complies with the specifications for distillate fuel oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1)
Steam Flow: Each day of operation, calculate and record the steam production rate for each 8-hour Block Average. Divide the total quantity of steam flow in each 8-hour block by the total operating time in the 8-hour block. Down time of 15 or more minutes is not to be included as operating time.	Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Willmar Municipal Utilities
Permit Number: 06700005 - 004

Subject Item: FS 002 Western Coal Pile

What to do	Why to do it
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. 7011.1110

TABLE B: SUBMITTALS

B-1 02/25/09

Facility Name: Willmar Municipal Utilities
Permit Number: 06700005 - 004

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

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 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

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.

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**B-2** 02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 004

What to send	When to send	Portion of Facility Affected
Notification	due 10 days after Startup combusting fuel oil.	EU004
Testing Frequency Plan	due 60 days after Performance Test for NOX and opacity emissions while combusting fuel oil. 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.	EU004

TABLE B: RECURRENT SUBMITTALS**B-3** 02/25/09

Facility Name: Willmar Municipal Utilities

Permit Number: 06700005 - 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 09/05/2007 (Submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	EU003
Quarterly Report	due 30 days after end of each calendar quarter starting 09/05/2007 . The reports shall include the following information: (1) Calendar dates covered in the reporting period, and (2) Records of fuel supplier certifications, and a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period.	EU004
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 09/05/2007 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 09/05/2007 (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**Facility Name:** Willmar Municipal Utilities**Permit Number:** 06700005-004

The following stack parameters were used in the model included in the permit application received December 24, 1990, for construction of Boiler #4. Revision of any of these parameters must result in plume dispersion characteristics equivalent to or better than the plume dispersion characteristics modeled for the December 1990 application. Revision of any of these parameters may require a permit amendment.

The modeling information request was submitted on 10/19/2004 (on time). This information was reviewed and verified as correct.

Table 1 – Modeled Parameters

SV ID No.	Modeled Height (feet)	Modeled Diameter (feet)	Modeled Temperature (°F)	Modeled Air Flow (acfm)	Modeled SO₂ (lb/hr)
001	108.0	5.3	320	25000	148.0 (24-hour average)
003	129.0	5.42	340	66000	442.0 (1-hour average)

Appendix C**Facility Name:** Willmar Municipal Utilities**Permit Number:** 06700005-004**Insignificant Activities and Applicable Requirements**

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(G)	Emissions from a laboratory, as defined in the subpart. <ul style="list-style-type: none">• Water testing agents used in the laboratory	Minn. R. 7011.0710/0715
3(H)	Miscellaneous: 4. brazing, soldering or welding equipment; <ul style="list-style-type: none">• Facility operates soldering and welding equipment	Minn. R. 7011.0710/0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of carbon monoxide; and 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone. <ul style="list-style-type: none">• Transfer of coal from coal piles to coal hopper – calculated PTE = 0.001362 tpy PM• Temporary equipment to receive, handle and store biomass is expected to have emission rates no higher than the emissions from handling coal.• Train unloading (coal) – calculated PTE = 0.02 tpy PM• Emergency generator – calculated PTE 0.005 ton PM/year, 0.005 ton SO₂/year, 0.08 ton NO_x/year, 0.006 ton VOC/year, 0.02 ton CO/year	Minn. R. 7011.1110 Minn. R. 7011.1110 Minn. R. 7011.2300
4	If a facility is applying for a part 70 permit, emissions units with emissions less than all the following limits but not included in subpart 2 must be listed in a part 70 permit application: B. potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs; <ul style="list-style-type: none">• Ash loading (into trucks) – calculated PTE = 1.4 tpy, actual emissions = 0.33 tpy	Minn. R. 7011.1110

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 06700005-004

This technical support document (TSD) is intended for all parties interested in the draft/proposed 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 draft/proposed permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 4931)
Willmar Municipal Utilities 704 Litchfield Avenue SW PO Box 937 Willmar, Minnesota 56201	Willmar Municipal Utilities 710 Benson Avenue SW Willmar, Minnesota 56201 Kandiyohi County
Contact: Kenneth Nash Phone: (320) 235-4422	

1.2. Description of the Permit Action

Willmar Municipal Utilities is an electricity and steam generating facility. The facility supplies electricity and steam for heating to residents and businesses of the City of Willmar. The facility is located in an area that is designated in attainment with ambient air standards or unclassified for all pollutants. The facility is a major source under 40 CFR § 52.21 (Prevention of Significant Deterioration), a synthetic minor for HAPs, and considered a major source under the federal operation permits program (40 CFR pt. 70).

Emission sources at the facility include Boiler No.1 (coal-fired), Boiler No. 2 (natural gas-fired), Boiler No. 3 (coal and gas-fired), Boiler No. 4 (gas and oil-fired), and fugitive sources including coal and ash handling systems. Boilers 2 and 3 serve generators producing electricity; Boiler 4 supplies steam only. Boiler 1 has been out of service for over 10 years and is not currently authorized to operate as it will require major physical modifications in the event the facility chooses to operate it in the future. Boiler 2 has the ability to use a Multiclone to remove PM but it is not in use because Boiler 2 is limited to burn only natural gas and it is seldom used. Boiler 3 is the main emission unit and has coal usage limits in order to remain minor for HAPs. Boiler No.3 has a Multiclone as control equipment which removes PM. The fuel oil tank has been removed from the facility, but a transport could be hooked up to boiler 4 and fuel oil burned

without a permit amendment. A major permit amendment would be needed to install a new fuel oil tank.

This permit action authorizes the use limited amounts of corn cobs and other defined biomass as supplemental renewable fuel source for Boiler No.3. The limited amounts of biomass will be used to conduct trial burns to evaluate operational feasibility and emission factors.

1.3 Description of the Activities Allowed by this Permit Action

This permit action is a major amendment.

Permit No. 06700005-003, included federally enforceable restrictions on fuel usage and fuel type for Boiler 3. It allowed natural gas and limited amounts of subbituminous coal. This permit amendment authorizes up to 500 tons of defined biomass as a cumulative total over the life of the permit amendment. For the test burns, the biomass would be introduced with air through an existing observation port near the rear of the boiler grate. No modifications to the boiler are necessary for short term testing purposes.

The facility will temporarily add equipment to receive, handle and store biomass. Corn cobs (the principally-desired item for testing) and other authorized biomass are being harvested and stored at an off-site location. WMU will transport limited quantities (e.g., sufficient for 1-2 days of test burns) to the WMU power plant site via dump trucks or farm trucks. The cobs and other authorized biomass will be stored in an outdoor pile at the plant site. The expectation is that most of any loose material would be separated from the authorized biomass at the time of harvesting; therefore, minimal windblown dust issues are expected from biomass storage in a pile. Authorized biomass will be moved from the on-site pile to the plant via front end loader. The means of getting the biomass into the plant will involve the addition of temporary equipment (e.g. use of a silage blower and temporary ductwork up to a boiler observation port, use of a portable electric screw conveyor through a plant opening up to the desired boiler elevation). These temporary emission units are being added to the list of insignificant activities as their associated emissions are expected to be no higher than the emissions associated with coal handling at the facility.

Synthetic minor limits on biomass will ensure that this modification remains non-major under NSR and that the entire facility remains non-major under 40 CFR part 63 and 40 CFR § 52.21.

This permit action incorporates a mandatory permit reopening action (DQ # 1968) to set limits for Boiler No.4 pursuant to Minn. R. 7017.2025, subp. 3. The Letter of Compliance dated 3/20/08 served as the 30-day notice to the permittee of the MPCA's intent to amend the permit. No other permit amendments or notifications are authorized or incorporated into this permit action.

1.4. Facility Emissions:

Table 1. Title I Emissions Increase Summary

Pollutant	Limited Emissions Increase from the Modification (tpy)	Source-wide Contemporaneous Increases and Decreases* (tpy)	Net Emissions Increase (tpy)	PSD/112(g) Significant Thresholds for major sources	NSR/112(g) Review Required? (Yes or No)
PM	2.1	N/A	2.1	25	No
PM ₁₀	0.77	N/A	0.77	15	No
PM _{2.5}	0.48	N/A	0.48		No
NO _x	0.78	N/A	0.78	40	No
SO ₂	0.09	N/A	0.09	40	No
CO	2.12	N/A	2.12	100	No
Ozone (VOC)	0.06	N/A	0.06	40	No
Lead	3.7E-04	N/A	3.7E-04	0.6	No
H ₂ SO ₄	2.9E-03	N/A	2.9E-03	7.0	No
Individual HAPs (**)	1.3	N/A	1.3	10	No
Total HAPs,	1.4	NA	1.4	25	No

* Other emission changes during the contemporaneous period as defined by 40 CFR § 52.21, 40 CFR § 52.24 or 40 CFR pt. 51.

** The largest change in individual HAP is for HCl. There is a large variability in Cl content values reported in current data bases for biofuels. This number represents a reasonably conservative estimate based on the very limited available information for corn cobs.

Table 2. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ Tpy(*)	PM _{2.5} tpy (**)	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	599.1	323.7	329.5	1936.4	622.6	267.6	7	1.8	13.1
Total Facility Actual Emissions (2006)	76.91	31.81	Not Reported	834.6	173.39	136.82	1.23	HAPs not reported in emission inventory	

(*) Emission factors and control efficiencies for PM₁₀ from coal for Boiler No. 3 were updated and corrected to account for organic condensibles and this accounts for the difference in the documented potential to emit.

(**)PM_{2.5} for the operation authorized by permit No. 06700005-003, is considered equal to PM₁₀. Emissions data for the modification authorized by this permit included PM_{2.5} and thus, this emissions increase was added to the emissions rate of PM₁₀ for the existing facility as a conservative estimate of PM_{2.5} authorized by this permit action.

Table 3. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	SO ₂ , PM, PM ₁₀ , NO _x , CO	NA	VOC's, Pb
Part 70 Permit Program	SO ₂ , PM, PM ₁₀ , NO _x , CO	NA	VOC's, Pb
Part 63 NESHAP	NA	HAPs	NA

2. Regulatory and/or Statutory Basis

New Source Review

The facility is an existing major source under federal New Source Review/Prevention of Significant Deterioration (PSD) program (40 CFR § 52.21). The facility is located in an area that is designated as attainment or unclassified for all pollutants. As of the time of this permit, no modifications requiring Best Available Control Technology (BACT) have been made or proposed at the facility. Boiler No. 2 and Boiler No. 4 are each subject to Title I conditions imposed at the time of modification (in the case of Boiler No. 2) and construction (in the case of

Boiler No. 4) such that the modification/construction were not considered major modifications under PSD. This permit action includes synthetic minor limits on the amount of biomass authorized that will ensure that the proposed modification does not trigger PSD and that the entire facility remains as a non-major source under 40 CFR part 63.

Part 70 Permit Program

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

New Source Performance Standards (NSPS)

Boiler No. 4 is subject to the Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR 60, Subpart Dc). This permit action does not change anything about this emission unit.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

There are no promulgated NESHAPs applicable to this facility. Coal usage limits and HAP coal content restrictions have been applied to prevent EU004 of this facility from being subject to the industrial boiler NESHAP (40 CFR 63, Subpart DDDDD).

Acid Rain Requirements (40 CFR 72)

The facility is not subject to Acid Rain requirements. None of the units is listed in tables 1, 2, or 3 of 40 CFR § 73.10 (40 CFR § 72.6(a)(1) and (2)); none of the units serves a generator with a nameplate capacity of 25 MW or greater (EU001 serves a generator of 4 MW, EU002 serves a generator of 7.5 MW, EU003 serves a generator of 17.8 MW, and EU004 does not serve a generator) (40 CFR § 72.6(a)(2) and (3)).

Minnesota State Rules

Several State Standards of Performance apply to portions of this facility. These include:

- Minn. R. 7011.0500 to 7011.0553 – New and Existing Indirect Heating Fossil Fuel Burning Equipment.
- Minn. R. 7011.0700 to 7011.0735 – Pre- and Post-1969 Industrial Process Equipment
- Minn. R. 7011.2300 – Stationary Internal Combustion Engines
- Minn. R. 7011.1110 – Existing Outstate Coal Handling Facilities

Table 4. Regulatory Overview of Units Affected by the Modification/Permit Amendment

EU, GP, or SV	Applicable Regulations	Comments:
EU003	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment. Since does not need any physical or operational change for the short term trials it remains existing indirect heating equipment. In addition, the estimated PM emission factor for the proposed biomass is lower than the emission factor for coal.
EU003	Minn. R. 7009.0020	SO ₂ limit set as a result of computer dispersion modeling completed at the time of construction of EU004 (which is not a major source of SO ₂ itself). The estimated sulfur content of the biomass is lower than the sulfur content in coal and thus, this modification does not affect this limit.
EU003	Title I limit to avoid NESHAPs	The facility is limited to burning a maximum of 75,000 tpy of coal in order to stay minor source for HAPs .
EU003	Title I limit to avoid NESHAPS and NSR	The facility is limited to burning a maximum of 500 tons of accumulated biomass over the life of the permit amendment.
EU003	Title I limit to avoid NESHAPs	Annual fuel analysis of coal and Total Chlorine and Total Fluorine coal content trigger levels remains. Coal reports show chlorine levels well below the permit amendment trigger level in the permit. Limit on total Chlorine and total Fluorine content in biomass was not imposed because calculations show the facility will remain below thresholds with good margin even at the highest values of Cl and F found in databases for wood and other biofuels.
EU 003	Minn. R. 7007.0800, subp. 2, subp., subp. 5, Minn. R. 70.17.2030, subp. 1-4, 7017.2018, and Minn. R. 7017.2035, subp. 1-2	Biomass fuel testing pre-authorization for the purpose of generating emission factors. Required record keeping and reporting for trial burns, fuel analysis and emission testing to generate emission factors.

3. Technical Information

3.1 Calculations of Potential to Emit and Emissions Increase Analysis

Most calculations for fossil fuels were done using the emission factors from the most recent revision of AP-42 and FIRE. Some calculations for fossil fuels were done using information from a fuel analysis and AP-42 equations.

For a worst estimate of annual emissions from biomass, it is assumed that all 500 tons could be combusted in a single year. No other emissions data for corn cobs was found and thus surrogate emissions data from other biomass fuels, either corn-based (e.g., stover) or wood-based emission factors were consulted. An additional factor of 2.0 was applied to emission factors for criteria pollutants selected as representative of the proposed biomass.

The emission factors for PM, PM_{2.5}, SO₂ and CO were selected from AP-42, Chapter 1.6, Table 1.6-1 for “wet wood” with a mechanical collector control device because the proximate analysis of cobs indicate a moisture content range between 24 and 30% as received.

The emission factor for NO_x was selected from emissions testing conducted for combustion of DDGS because it is presumed to be more representative of cob combustion than wet wood. The emission factors for VOCs and Lead were selected from AP-42, Chapter 1.6, “Wood Waste Combustion,” Tables 1.6-3 and 1.6-4 respectively because wood waste is presumed to be more representative of corn cobs than coal.

In the case of HAPs, the applicant used AP-42 factors for Wood Combustion as a surrogate for firing of Corn Cobs in WMU’s Boiler #3. WMU supplied the results of proximate and ultimate analysis of a sample of corn cobs. Because of the wide range in chlorine and fluorine content in wood, alternative calculations for HCl and HF emissions from burning biomass were included. These calculations were based on information in the permit No. 13900114-002 for Koda and in Table 4-2 of document titled Emission Factors for Priority Biofuels in Minnesota, Final Report, available at <http://www.pca.state.mn.us/publications/aq1-33.pdf>. An additional factor of 4.0 was applied to the HCl and HF factors selected as representative of the proposed biomass. According to the information provided with the permit application for Koda’s permit No. 13900114-002, it shows corn stover with 0.266 percent, by weight Cl. It shows corn cobs with ND. It shows pine saw dust with 0.07 percent, by weight Cl. It shows pine with 0.03 percent, by weight Cl. The factor of 4 to extrapolate from wood to corn cobs is justified.

Where a Title I emission limit or NSPS emission limit exists, they supersede the AP-42 emission factors. Potential emissions are based on operating limits imposed in the permit, and the most stringent short term applicable limits.

Attachment 1 contains detailed spreadsheets and supporting information prepared by the MPCA and the Permittee, as well as Form EC-02 prepared by the Permittee with specific source references for the emission factors used.

Attachment 2 to this TSD contains Facility Description and Compliance Demonstration Forms (CD-01).

3.2 Emissions Testing to Generate Emission Factors

Because of the limited emissions data available on the combustion of biomass on a co-fired mode; the permit includes conditions to ensure that during the trial burns when stack testing is done:

- Approved test plans include the pollutants of concern from the regulatory standpoint.
- Approved test plans include definition of operating conditions as well as sufficient records of these operating conditions.
- Approved test plans include sufficient fuel analysis to correlate fuel composition to emissions data from stack testing.
- Approved test plans define appropriate sampling and analysis methods

The applicant indicated that if the proposed biofuels trial burn show that this is a feasible alternative on the long term, permanent physical and operational changes would be implemented: the boiler would be upgraded (e.g. additional air ports, new steam soot blowers, a larger induced draft fan, etc.), a fabric filter would be added for enhanced control of fine particulate matter, and the fuel handling and ash load operations would be improved. The long term renewable energy project would require a permit amendment. The issue of testing for a wide range of HAPs was discussed. In light of the prospective upgrades to the boiler for the long term renewable energy project, MPCA agreed to limit the testing of HAPs during the trial burns authorized by this permit action. However, the current information on emission factor for HAPs shows a wide range in values for typical risk drivers and the MPCA would be looking at conservative values of all pollutants to estimate the emission increases due to a proposed long term renewable energy project.

The permit includes language that defines when stack test results constitute a “performance test” for the purpose of setting limits pursuant to Minn. R. 7017.2025, subp. 3.

3.3 Solid Waste and Air Quality Permitting Requirements for By-Product and Biomass Material in a Combustion Process.

Attachment 3 to this TSD includes the guidance that MPCA has prepared on the subject. None of the biomass authorized in this permit falls in the category of materials that could be considered solid waste. In light of this, it was not necessary to limit the biomass co-fired in trial burns to less than 30 percent by mass or less pursuant to Minn. Rules 7011.055.

Some of the materials originally proposed (DDGS and corn kernels), with proper handling and management, are candidates for obtaining a Case Specific Beneficial Use Determination (CSBUD) from the MPCA. However, WMU opted to avoid any material that could be subject to a CSBUD.

The MPCA combustion biomass guidance does not alter the meaning of solid waste under federal regulations, and as such, this is still an uncertain matter until it is resolved at the federal level.

3.4 Compliance Assurance Monitoring

Boiler 3 (EU 003) is considered a “pollutant specific emissions unit” (PSEU) and is therefore subject to CAM rules. The control equipment applies only to PM reduction for the burning of solid fuels. The addition of biomass to EU003 does not change CAM requirements. The uncontrolled PTE is greater than the major source threshold and the limited PTE is less than the threshold, therefore the facility is considered an “other pollutant specific emissions unit”. The CAM plan uses pressure drop in the Multiclone (CE 003) as the primary indicator of emission unit performance, and is required to be read manually once every eight hours. A Continuous Opacity Monitoring System (COMS) is used as a secondary indicator.

3.5 Modeling Limits

The technical support document for Permit No. 06700005-003, describes the basis for the modeling limits. The estimated sulfur content of the biomass is lower than the sulfur content in coal and thus, this modification does not affect this limit or any other compliance demonstration requirement.

3.6 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.

The technical support document for Permit No. 06700005-003 summarizes the periodic monitoring requirements for the total facility. Table 5 below includes only those conditions that were added or changed as a result of this permit action and for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 5. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
EU003	Biomass Usage Limit: (Minn. R. 7007.0800 subp 2; Minn R. 7017.2025, subp 3 and 3a)	Daily biomass usage record from solid fuel scales whenever biomass is being combusted	The facility is limited to burning a maximum of 500 tons of accumulated biomass in order to stay minor for HAPs and NSR.
EU003	Performance Testing for Generation of Emission Factors and Biomass Fuel Analysis	Approved Test Plan Requirements	Please see the discussion in part 3.2 above.
EU003	Definition of Authorized Biomass	Biomass Fuel Usage Records	Please see the discussion in part 3.3 above.

3.7 Insignificant Activities

Willmar Municipal Utilities has several operations which are classified as insignificant activities. These are listed in Appendix C to the permit. This permit action does not change the list or requirements applicable to Insignificant Activities but it adds to the list the equipment to receive, handle and store biomass, as their associated emissions are expected to be no higher than the emissions associated with coal handling at the facility.

3.8 Public Comment and U.S. Environmental Protection Agency (EPA) Review

Public Notice Period: January 9 – February 9, 2009

Concurrent EPA 45-day Review Period: January 9 – February 24, 2009

No comments were received from the public.

No comments were received from EPA.

4. Conclusion

Based on the information provided by Willmar Municipal Utilities, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 06700005-004, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Carolina Espejel-Schutt (permit writer/engineer)
Rachel Peters (enforcement)
Marc Severin (stack testing)
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Beckie Olson (administrative support)

AQ File No. 712A; DQ 2326 and 1968

Attachments: 1. PTE Summary and Emissions Increase Calculation Spreadsheets
2. Facility Description and CD-01 Forms
3. Solid Waste and Air Quality Permitting Requirements for By-Product and Biomass Material in a Combustion Process