

**AIR EMISSION PERMIT NO. 03700064- 001  
IS ISSUED TO**

**NORTHERN STATES POWER COMPANY**  
A Minnesota Corporation doing business as Xcel Energy

**Wescott Plant**  
10326 South Robert Trail  
Inver Grove Heights, Dakota County, MN 55075

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

Permit Type	Application Date
Minor Permit Amendment	May 5, 2000
Total Facility Operating Permit	September 5, 1995

This permit 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 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 23, 2000

**Expiration:** October 23, 2005

All Title I Conditions do not expire.

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Richard J. Sandberg, Manager  
Major Facilities Section  
Metro District

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. ch. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, Major Facilities Section, Metro District, 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.

The permit shield language is not intended to allow you to deviate from permit conditions without obtaining the required prior approvals.

**FACILITY DESCRIPTION:**

The Wescott Plant is a liquefied natural gas and propane peak-shaving plant. The facility collects and stores propane and natural gas for future supply to the local propane and natural gas distribution systems during cold winter periods when regional natural gas and propane supplies may not meet the increased demand. The facility consists of:

- Four water/glycol boilers used to heat natural gas from a liquid to a vapor for injection into the gas distribution system.
- One regeneration heater which heats filtered natural gas to regenerate the filter material used to clean the gas before liquefaction.
- One natural gas powered compressor that compresses inlet natural gas to liquefy prior to storage and compresses the refrigerant used in liquefying the natural gas to storage.
- Two liquid natural gas storage tanks of 23 million gallons and 1.2 million gallons.
- Two liquid propane storage tanks of 5.85 million gallons each.

Each storage tank has a vapor recovery system that either routes the vapors through a liquefaction process and back to the tank, or directly out to the distribution system.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

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

**Subject Item: Total Facility**

<b>What to do</b>	<b>Why to do it</b>
<b>A. OPERATIONAL REQUIREMENTS</b>	hdr
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: 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)
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
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
<b>B. POLLUTION CONTROL EQUIPMENT REQUIREMENTS</b>	hdr
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)
<b>C. TESTING REQUIREMENTS</b>	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Operating and/or production limits will be placed on emission units based on operating conditions during performance testing. Limits set as a result of a performance test (conducted before or after permit issuance) apply until new operating/production limits are set following review of a performance test as specified by Minn. R. 7017.2025.	Minn. R. 7017.2025
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.	Minn. R. 7017.2020, subp. 4
<b>D. MONITORING REQUIREMENTS</b>	hdr
Monitoring Activities and Equipment: Where applicable, initialize monitoring activities and install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring activities are not performed or monitoring equipment is not installed and operational prior to permit issuance.	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)
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)
<b>E. RECORDKEEPING</b>	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

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)
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)
F. REPORTING	hdr
Oral or Written (faxed) 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
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
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
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due 91 days after end of each calendar year (April 1) following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

**Subject Item:** GP 001 Water/Glycol Heaters**Associated Items:** EU 003 Water/Glycol heater

EU 004 Water/Glycol heater

EU 005 Water/Glycol heater

What to do	Why to do it
EMISSION LIMITS  *All emission limits apply individually to each emission unit. **Compliance with the following emission limit shall be determined, and the averaging time dictated by the appropriate test method.	hdr
Nitrogen Oxides: less than or equal to 0.14 lbs/million Btu heat input	Title I Condition: To limit potential NOx emissions to less than the PSD significant net emissions increase level as defined in 40 CFR Section 52.21.
OPERATIONAL LIMITS	hdr
Operating Hours: less than or equal to 9404 hours/year using 12-month Rolling Sum	Title I Condition: To limit potential NOx emissions to less than the PSD significant net emissions increase level as defined in 40 CFR Section 52.21.
Fuel Usage: Limited to pipeline quality natural gas.	Minn. R. 7007.0800, subp. 2. To limit the uncontrolled NOx emission rate from each unit.
RECORD KEEPING	hdr
Each month, by the 15th of each month, calculate and record the 12-month rolling sum combined hours of operation for all emission units in GP 001 for the previous 12 month period.	Title I Condition: To demonstrate compliance with NOx synthetic minor limit
Each month, by the 1st of each month, record the monthly fuel usage for each unit for the previous month.	40 CFR Section 60.48c(g); alternative schedule.
Record may be in the form of fuel bills or meter readings.	
REPORTING	hdr
Notification of any physical or operational change which may increase emissions, in accordance with 40 CFR 60.7(a)(4). The notification shall be postmarked 60 days or as soon as practicable before the change is commenced.	40 CFR 60.7(a)(4)
PERFORMANCE TESTING	hdr
Initial Performance Test: due 90 days after achieving 6000 hours of combined operating hours over a 12-month rolling sum, to measure nitrogen oxides emissions. The test shall be performed on any emission unit in GP 001.	Minn. R. 7007.0800, subp. 4
General Performance Test (PT) Requirements:  Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.  PT Notifications (written): due 30 days before each Performance Test PT Plan: due 30 days before each Performance Test PT Pre-test Meeting: due 7 days before each Performance Test PT Report: due 45 days after each Performance Test PT Report-Microfiche: 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**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

**Subject Item:** EU 001 Regeneration Heater**Associated Items:** SV 001 Regeneration Heater

What to do	Why to do it
Opacity: less than or equal to 20 percent except for one six minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510
Fuel Usage: Limited to pipeline quality natural gas.	Minn. R. 7007.0800 subp. 2



**TABLE A: LIMITS AND OTHER REQUIREMENTS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

**Subject Item:** EU 002 Compressor engine**Associated Items:** SV 002 Compressor engine

What to do	Why to do it
Opacity: less than or equal to 20 percent once operating temperature is attained.	Minn. R. 7011.2300
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300
Fuel Usage: Limited to pipeline quality natural gas.	Minn. R. 7007.0800 subp. 2 and meets requirements of Minn. R. 7011.2300

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

**Subject Item:** EU 006 Water/Glycol heater**Associated Items:** SV 006 Water/Glycol heater

What to do	Why to do it
Notification of any physical or operational change which may increase emissions, in accordance with 40 CFR 60.7(a)(4). The notification shall be postmarked 60 days or as soon as practicable before the change is commenced.	40 CFR 60.7(a)(4)
Each month, by the 1st of each month, record the monthly fuel usage for each unit for the previous month. Record may be in the form of fuel bills or meter readings.	40 CFR Section 60.48c(g); alternative schedule.

## TABLE B: SUBMITTALS

10/23/00

Facility Name: NSP - Wescott Plant  
Permit Number: 03700064 - 001

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:

Permit Technical Advisor  
Permit Section  
Air Quality 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:

Supervisor  
Compliance Determination Unit  
Air Quality 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**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup	EU006
Notification of the Date Construction Began	due 30 days after Start Of Construction. Notification shall include all items stated in 40 CFR 60.48c(a)(1) and (3).	EU006

**TABLE B: RECURRENT SUBMITTALS**

10/23/00

Facility Name: NSP - Wescott Plant

Permit Number: 03700064 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first 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.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604	Total Facility

APPENDIX MATERIAL

Facility Name: NSP - Wescott Plant

Permit Number: 03700064-001

Insignificant Activities:

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**DRAFT AIR EMISSION PERMIT NO. 03700064-001**

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 draft permit conditions, including references to the applicable statutory or regulatory provisions.

**1. General Information** *(Information will be obtained from permit application forms GI-01, GI-04, GI-05 parts 1&2, and GI-07)*

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 4925 )
Northern States Power Company  414 Nicollet Mall (RSQ-6)  Minneapolis, Minnesota 55401-1993	10326 S Robert Trail  Inver Grove Heights  Dakota County

1.2. Description of the facility

The Wescott Plant is a liquefied natural gas and propane peak-shaving plant. The facility collects and stores propane and natural gas for future supply to the local propane and natural gas distribution systems during cold winter periods when regional natural gas and propane supplies may not meet the increased demand. The facility consists of:

- Three water/glycol boilers used to heat natural gas from a liquid to a vapor for injection into the gas distribution system.
- One regeneration heater, which heats filtered natural gas to regenerate the filter material, used to clean the gas before liquefaction.
- One natural gas powered compressor that compresses inlet natural gas to liquefy prior to storage and compresses the refrigerant used in liquefying the natural gas to storage.
- Two liquid natural gas storage tanks of 24.65 and 1.58 million gallons.
- Two liquid propane storage tanks of 5.85 million gallons each.
- Various valves, electric pumps and other fittings that may emit fugitives

Each storage tank has a vapor recovery system that either routes the vapors through a liquefaction process and back to the tank, or directly out to the distribution system.

### 1.3 Description of any changes allowed with this permit issuance

This permit allows the installation of one additional water/glycol boiler used to heat natural gas from a liquid to a vapor for injection into the gas distribution system. The Potential to Emit (PTE) of this boiler, which is identical to the other three water/glycol boilers, is less than 40 tons per year (TPY) of Nitrogen Oxides (NO<sub>x</sub>) and Sulfur Dioxide (SO<sub>2</sub>) and less than 15 TPY of Particulate Matter less than 10 um in size (PM<sub>10</sub>). Therefore, the modification is considered a minor amendment under Minn. R. 7007. Although, the new boiler does allow for increased vaporization and distribution of liquefied natural gas to the distribution system when demand is high during extreme cold weather, the new boiler does not debottleneck the overall annual process (i.e. the seasonal operation of the plant and the ability to liquefy and store the incoming gas).

### 1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Permit Number and Issuance Date	Action Authorized
202T-90-I/O-1 June 1, 1990	Installation and operation of three liquid natural gas vaporizers.
03700064-004 April 24, 1997	Installation and operation of three water/glycol heaters used to vaporize liquid natural gas.

### 1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

*Note: Quantification of emissions by emission unit is discretionary. The author may choose to include only total facility emissions, include breakdown of emissions for the larger emission units, or include emissions for all emission units. Quantification of total facility emissions is required.*

EU #	SV#	Emission Unit Description	PM TPY	PM <sub>10</sub> TPY	SO <sub>2</sub> TPY	NO <sub>x</sub> TPY	CO TPY	VOC TPY	Pb TPY	Single HAP TPY	All HAPs TPY
001	001	vaporization heater	0.9	0.9	0.04	9.2	2.3	1.45			
002	002	gas compressor	1.5	1.5	0.09	509.3	64.4	1.45			
003	003	Water Glycol heater	0.26	0.26	0.16	36.8	9.5	1.45			
004	004	Water Glycol heater	0.26	0.26	0.16	36.8	9.5	1.45			
005	005	Water Glycol heater	0.26	0.26	0.16	36.8	9.5	12.4			
006	006	Water Glycol heater	0.26	0.26	0.16	36.8	9.5	0.18			
FS 001	FS 001	valves, pumps, flanges						15.5			



	PM TPY	PM <sub>10</sub> TPY	SO <sub>2</sub> TPY	NO <sub>x</sub> TPY	CO TPY	VOC TPY	Pb TPY	Single HAP TPY	All HAPs TPY
Total Facility Limited Potential Emissions*	2.7	2.7	0.3	558	76.9	29.7			
Total Facility Actual Emissions*	0.5	0.5	0.03	166	21.2	19.6			

\*These are the limited potential emissions from column 3 in GI-07 from Delta. They differ from those in the permit application sent by the company in that they have been verified and corrected as need be by Minnesota Pollution Control Agency (MPCA) staff. These are the potential emissions that would appear in a public notice.

Table 2. Facility(TF) and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)	NO <sub>x</sub> ,		CO, NO <sub>x</sub> , SO <sub>2</sub> , PM <sub>10</sub>
NAAR (list pollutant)			
Part 70 Permit Program (list pollutant)	NO <sub>x</sub> ,	CO	HAPs, SO <sub>2</sub> , PM <sub>10</sub>

\* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

## 2. Regulatory and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

### Regulatory Overview of Facility

*The purpose of this table is to give a summary overview of the significant sources of emissions and the applicable regulations and standards(e.g., National Emission Standards for Hazardous Air Pollutant Sources (NESHAPs), New Source Performance Standards (NSPS). Title I conditions, special operating parameters) It is not designed for the discussion of specific limits or requirements, unless they are unusual and need some explanation, nor is it for the discussion of compliance demonstration requirements. This information is obtainable from the permit itself, this section is intended to provide users in the future with a quick picture of how the facility is being regulated and permitted..*

EU, GRP, or SV #	Applicable Regulations	Comments:
EU003 EU004 EU005 EU006	40 CFR 60 subp. Dc	Standards of Performance for Small and Industrial Commercial and Institutional Steam Generating Units. Natural gas only, no additional requirements.
EU003 EU004 EU005	40 CFR 52.21	Group of units limited to 9404 combined hours of operation per year. Title I Synthetic Minor limit for NO <sub>x</sub> .
EU002	Minn. R. 7007.2300	Standards of Performance for Internal Combustion

		Engines: $\text{SO}_2 \leq 0.5 \text{ lbs/MMBtu}$ Opacity $\leq 20$ percent once operating temp. is attained
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### **3. Technical Information**

All the main natural gas and propane tanks at the facility are exempt from the NSPS K, Ka and Kb and the state Standards of Performance for Storage Vessels due to the fact that, although the tanks store liquid gas, neither (propane may be considered as a condensate) is liquid at standard conditions. Furthermore, methane is not a Volatile Organic Compound (VOC) and therefore is not regulated.

### **4. Conclusion**

Based on the information provided by Northern States Power, the MPCA has reasonable assurance, except for ambient air impacts of Nitrogen Oxides, that the proposed operation of the emission facility, as described in the Air Emission Permit No. 03700064-001 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: Daren K. Zigich

Attachment: CD-01 Forms  
Others specified in section 3