

DRAFT/PROPOSED

AIR EMISSION PERMIT NO. 14100036-006 Total Facility Operating Permit - Reissuance

IS ISSUED TO

Liberty Diversified Industries

Liberty Paper Inc
13500 Liberty Lane
Becker, Sherburne County, MN 55308

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

This permit supersedes Air Emission Permit No. 14100036-005 authorizes the Permittee to operate and construct 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; Part 70/Limits to Avoid NSR

Operating Permit Issue Date: <issue date>

Expiration Date: <*> – Title I Conditions do not expire.

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

for John Linc Stine
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit –Reissuance Major Amendment	June 29, 2007 August 22, 2012	006

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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:

Liberty Paper, Inc. (LPI) owns and operates a cardboard recycling facility in Sherburne County, Becker Minnesota. The facility consists of a cardboard paper line (CPL), paper coating machine (PCM), paper dyeing, facility solvent cleaning, 4 temporary boilers, biogas flare, and flash aerator. The facility major sources of emissions are volatile organic compounds (VOCs) and carbon monoxide (CO), which are limited based permit restrictions. The facility has accepted limits to avoid major source classification under New Source Review (NSR).

This permit action is the reissuance of the Title V Operating Permit. The permit action also includes a major modification to install and operate a biogas generator, to increase the throughput requiring a revised Best Available Control Technology (BACT) analysis and chemical use on the CPL, and to add the effluent treatment plant (ETP).

TABLE A: LIMITS AND OTHER REQUIREMENTS

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Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

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
This permit establishes limits on the facility to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: To avoid classification as major source or modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
Insignificant Activities: The Permittee shall evaluate the potential emissions from changes made under Minn. R. 7007.1300 on an annual basis. The Permittee shall not make any change that causes potential emissions to exceed permit thresholds in Minn. R. ch. 7007 without first obtaining a major permit amendment.	Title I Condition: To avoid classification as major source or modification under 40 CFR Section 52.21& Minn. R. 7007.3000
OPERATIONAL REQUIREMENTS	hdr
Permit Appendices: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in the appendices.	Minn. R. 7007.0800, subp. 2
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subps. 14 & 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
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
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
No owner or operator shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	40 CFR Section 60.12; Minn. R. 7011.0050
The Permittee shall follow the actions and recordkeeping specified in the Performance Testing and Continuous Emissions Monitoring Exemption Response, and attached as Appendix B.	Minn. R. 7007.0800, subp. 2

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, and B.	Minn. R. ch. 7017
<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements.</p> <p>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</p> <p>The Notification, Test Plan, and Test Report may be submitted in an alternative format as allowed by Minn. R. 7017.2018.</p>	Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 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: The Permittee shall calibrate all required monitoring equipment at least once every 12 months (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and B monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A). (Satisfies the requirement of 40 CFR Section 60.7(f))	Minn. R. 7007.0800, subp. 5(C); 40 CFR Section 60.7(f))
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. For expiring permits, 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
<p>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.</p> <p>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.</p>	Minn. R. 7019.1000, subp. 3

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

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. 7007.1150-7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 - 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). Performance testing deadlines from the General Provisions of 40 CFR pt. 60 and pt. 63 are examples of deadlines for which the MPCA does not have authority to grant extensions and therefore do not meet 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.	Minn. R. 7019.3000 - 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 - 7002.0095

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: GP 001 Total Facility VOC Limits**Associated Items:** EU 001 Cardboard Paper Line (CPL)

EU 003 Paper Coating Machine (PCM)

EU 004 Paper Dyeing

EU 005 Facility Solvent Cleaning

What to do	Why to do it
EMISSION LIMITS	hdr
<p>Volatile Organic Compounds: less than or equal to 200 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit.</p> <p>All emission units or stacks added to GP 001 as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of VOCs used may take into account recovered/recycled VOCs as described under the Waste Credit requirement in GP 001.</p>	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. This applies separately to each unit. None of these emission units are expected to generate any particulate matter emissions.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This limit applies separately to each emission unit in GP 001.	Minn. R. 7011.0715, subp. 1(B)
RECORDKEEPING AND MONITORING REQUIREMENTS	hdr
<p>The Permittee is pre-authorized to make the following changes:</p> <ol style="list-style-type: none"> 1). Move or modify GP001 listed emission units, except for EU 001; and 2). Replace listed emission units with similar ones to those listed in GP 001. <p>Provided the following conditions are met:</p> <ol style="list-style-type: none"> 1). For replacement units: the capacity is less than or equal to the unit it replaces and the application method achieves the same or better transfer efficiency; 2). VOC emissions are tracked and calculate as specified in this permit; and 3). All equipment must meet the requirements for GP 001. <p>If a proposed change triggers an applicable requirement that is not contained in this permit, the change must be permitted using the appropriate procedure in Minn. R. ch. 7007.</p>	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
<p>Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change.</p> <p>The list shall correlate the units to the numbers used in this permit (EU, GP) and shall include the data on the appropriate current application forms. The date of construction shall be the date the change was made for replaced, modified, or new equipment.</p>	Minn. R. 7007.0800, subp. 2
Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain the total quantity of all coatings and other VOC containing materials used at the facility. This shall be based on written usage logs and/or purchase/delivery records.	Title I Condition: To avoid classification as major source and modification under 40 CFR 52.21 & Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5
<p>Monthly Recordkeeping -- VOC Emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <ol style="list-style-type: none"> 1) The total usage of VOC-containing materials for the previous calendar month using the daily usage records. This record shall also include the VOC contents of each material as determined by the Material Content requirement of this permit; 2) The VOC emissions for the previous month using the formulas specified in this permit; and 3) The 12-month rolling sum VOC emissions for the previous 12-month period by summing the monthly VOC emissions data for the previous 12 months. 	Minn. R. 7007.0800, subps. 4 and 5

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

<p>Monthly Calculation -- VOC Emissions. The Permittee shall calculate VOC emissions using the following equations:</p> $\text{VOC (tons/month)} = V - W$ $V = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$ $W = (C1 \times D1) + (C2 \times D2) + C3 \times D3) + \dots$ <p>Monthly VOC Emissions Calculation Continued:</p> <p>where:</p> <p>V = total VOC used in tons/month; A# = amount of each VOC-containing material used, in tons/month; B# = weight percent VOC in A#, as a fraction; W = the amount of VOC shipped in waste, in tons/month; C# = amount, in tons/month, of each VOC-containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero; and D# = weight percent of VOC in C#, as a fraction.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Material Content. VOC contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC. The Commissioner reserves the right to require the Permittee to determine the VOC according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the MSDS.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Waste Credit: If the Permittee elects to obtain credit for VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC any of the materials.</p>	Minn. R. 7007.0800, subps. 4 and 5

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: GP 002 Temporary Package Boiler Subject to NSPS Db**Associated Items:** EU 006 Temporary Package Boiler #2

EU 007 Temporary Package Boiler #3

EU 008 Temporary Package Boiler #4

EU 009 Temporary Package Boiler #5

What to do	Why to do it
The following requirements are applicable to each individual temporary boiler in GP 002. If the temporary boilers are not installed, these requirements are not applicable.	hdr
<p>Temporary boilers are not subject to 40 CFR pt. 60, subp. Db; if they meet the following definition below; otherwise the boilers are subject to the permit requirements if installed.</p> <p>Temporary boiler means any gaseous or liquid fuel-fired steam generating unit that is designed to, and is capable of, being carried or moved from one location to another by means of, for example, wheels, skids, carrying handles, dollies, trailers, or platforms. A steam generating unit is not a temporary boiler if any one of the following conditions exists:</p> <p>(1) The equipment is attached to a foundation</p> <p>(2) The steam generating unit or a replacement remains at a location for more than 180 consecutive days. Any temporary boiler that replaces a temporary boiler at a location and performs the same or similar function will be included in calculating the consecutive time period. (continued below)</p>	Minn. R. 7007.0800, subp. 2
<p>(continued from above)</p> <p>(3) The equipment is located at a seasonal facility and operates during the full annual operating period of the seasonal facility, remains at the facility for at least 2 years, and operates at that facility for at least 3 months each year.</p> <p>(4) The equipment is moved from one location to another in an attempt to circumvent the residence time requirements of this definition.</p>	Minn. R. 7007.0800, subp. 2
GENERAL PROVISIONS	hdr
Recordkeeping: Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility including; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Section 60.7(b); Minn. R. 7019.0100, subp. 1
EMISSION LIMITS	hdr
Nitrogen Oxides: less than or equal to 0.10 lbs/million Btu heat input using 30-day Rolling Average for low heat release rate and 0.20 lbs/MMBtu heat input using 30-day Rolling Average for high heat release rate. This standard applies at all times including periods of startup, shutdown, or malfunction.	40 CFR Section 60.44b(a), (h), & (i); Minn. R. 7011.0565
Total Particulate Matter: less than or equal to 0.030 lbs/million Btu heat input . This standard applies at all times except during periods of startup, shutdown, or malfunction.	40 CFR Section 60.43b(h)(i); 40 CFR Section 60.46b(a)
OPERATING LIMITS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS
A-7 12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

<p>Fuel Usage: Total facility fuel use for the package boilers is limited to fuel use based on the following CO Compliance Calculation and CO emission factors:</p> $\text{CO emissions} = (0.00155 \times A + 0.13524 \times B + 0.2069 \times C) / 2000 \leq 210 \text{ tpy}$ <p>Where: A = cubic feet of natural gas used per month B = gallons of propane used per month C = gallons of distillate fuel oil per month</p> <p>CO Emission Factors Natural Gas: 0.00155 lb/ft³ LP Gas: 0.00148 lb/MMBtu = 0.13524 lbs/gal Distillate Fuel Oil: 0.00148 lb/MMBtu = 0.2069 lbs/gal</p> <p>The Annual Capacity Factor (CO Emissions equation) shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each month.</p>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000;</p>
<p>The Permittee shall record and maintain records of the amounts of each fuel combusted during each day and calculate the annual capacity factor individually for natural gas, propane, and distillate fuel oil for the reporting period. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month.</p>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000; 40 CFR Section 60.49b(d); Minn. R. 7011.0565</p>
<p>Fuel type: Limited to natural gas, propane, and distillate fuel oil only.</p> <p>The distillate fuel oil shall meet the definition of a very low sulfur oil of not exceeding 0.30 weight percent sulfur.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>COMPLIANCE DEMONSTRATION</p>	<p>hdr</p>
<p>Initial NOx Compliance Test: NOx from the steam generating units (EU 006, EU 007, EU 008, and EU 009) shall be monitored for 30 successive steam generating unit operating days and the 30-day average emission rate shall be used to determine compliance. The 30-day average emission rate shall be calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.</p>	<p>40 CFR Section 60.46b(c) and (e)</p>
<p>The initial NOx compliance test shall be conducted within 60 days after achieving the maximum production rate at which the affected facility will be operated, but no later than 180 days after initial startup. The Permittee shall provide a written report of the results of the performance test.</p>	<p>40 CFR Section 60.46b(e); 40 CFR Section 60.8</p>
<p>The Permittee shall determine compliance with the PM emission standards either with performance testing, as described in 40 CFR Section 60.36b(d) or with PM CEMs, as subsequently described under this GP 002.</p>	<p>40 CFR Section 60.46b(b)</p>
<p>In place of PM testing with Method 5 or 5B, or Method 17, the Permittee may install, calibrate, maintain, and operate a PM CEMs and record the output. If the Permittee uses PM CEMs instead of performance testing, the Permittee shall:</p> <ol style="list-style-type: none"> 1) Notify the Administrator one month before starting use of the system. 2) Notify the Administrator one month before stopping use of the system. 3) The monitor shall be installed, evaluated, and operated in accordance with 40 CFR Section 60.13. 4) The initial performance evaluation shall be completed no later than 180 days after the date of initial startup or within 180 days of notification to the Administrator of use of the CEMs if the Permittee was previously determining compliance by Method 5, 5B, or 17, whichever is later. <p>(continued below)</p>	<p>40 CFR Section 60.46b(c) and (j)</p>
<p>(continued from above)</p> <ol style="list-style-type: none"> 5) The Permittee shall conduct an initial performance test for PM emissions. Compliance with the PM emission limit shall be determined by CEMs to measure PM and calculating a 24-hour block arithmetic average emission concentration using EPA Reference Method 19. 6) Compliance with the PM emission limit shall be determined based on the 24-hour daily (block) average of the hourly arithmetic average emission concentrations using CEMs outlet data. 7) At a minimum, valid CEMs hourly averages shall be obtained for 75 percent of the total operating hours per 30-day rolling average. At least, two data points shall be used to calculate each 1-hour arithmetic average. <p>(continued below)</p>	<p>40 CFR Section 60.46b(c) and (j)</p>

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

<p>(continued from above)</p> <p>8) The 1-hour arithmetic averages shall be expressed in lb/MMBtu heat input and shall be used to calculate the boiler operating day daily arithmetic average emission concentrations.</p> <p>9) All valid CEMs data shall be used in calculating average emission concentration even if the minimum CEMs data requirements are not met.</p> <p>10) The CEMs shall be operated according to Performance Specification 11.</p> <p>11) During the correlation testing runs of the the CEMs, PM and O2 (or CO2) data shall be collected concurrently (or within a 30- to 60- minute period) by both the continuous emission monitors and performance tests conducted using the following test methods:</p> <p>i) For PM, Method 5 or %b or Method 17;</p> <p>ii) For O2 (or CO2), Method 3A or 3b, as applicable.</p> <p>(continued below)</p>	40 CFR Section 60.46b(c) and (j)
<p>(continued from above)</p> <p>12) Quarterly accuracy determinations and daily calibration drift tests shall be performed in accordance with procedure 2. Relative Response Audit's must be performed annually and Response Correlation Audits must be performed every 3 years.</p> <p>13) When PM emissions data are not obtained because of CEMs breakdowns, repairs, calibration checks, and zero and span adjustments, emissions data shall be obtained using other monitoring systems as approved by the Administrator or EPA Reference Method 19 to provide, as necessary, valid emissions data for a minimum of 75 percent of total operating hours per 30-day rolling average.</p> <p>14) Within 90 days after completing a correlation testing run, the Permittee shall either successfully enter the test data into EPA's WebFIRE data based or mail a copy to US EPA, as provided.</p>	40 CFR Section 60.46b(c) and (j)
<p>Fuel Supplier Certification Requirements: The fuel certification shall contain the following information for #2 fuel oil:</p> <p>1. The name of the oil supplier;</p> <p>2. A statement from the oil supplier that the oil meets the definition of a very low sulfur oil (< 0.30 weight percent sulfur); and</p> <p>3. The sulfur content of the oil.</p>	Minn. R. 7007.0800, subps. 4 and 5
MONITORING REQUIRMENTS	hdr
The Permittee shall install, calibrate, maintain, and operate CEMS for measuring NOx and O2 (or CO2) emissions discharged to the atmosphere, and shall record the output of the system.	40 CFR Section 60.48b(b)(1); Minn. R. 7011.0565
The CEMS shall be operated and data recorded during all periods of operation of EU 006, EU 007, EU 008, and EU 009 except for CEMS breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.	40 CFR Section 60.48b(c); Minn. R. 7011.0565
The 1-hour average NOx emission rates measured by the NOx CEMS shall be expressed in lb/MMBtu heat input and shall be used to calculate the 30-day average emission rate. The 1-hour averages shall be calculated using data points required under 40 CFR Section 60.13(h)(2).	40 CFR Section 60.48b(d); Minn. R. 7011.0565
The procedures under 40 CFR Section 60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring systems.	40 CFR Section 60.48b(e); Minn. R. 7011.0565
When NOx emission data are not obtained because of CEMs breakdowns, repairs, calibration checks an zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7, Method 7a or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive system generating unit operating days.	40 CFR Section 60.48b(f); Minn. R. 7011.0565
If the Permittee is complying with the PM emission limit by using PM CEMs, the Permittee must calibrate, maintain, operate, and record the output of the system for PM emissions discharged to the atmosphere. The CEMs shall be operated and data recorded during all periods of operation except for CEMs breakdowns and repairs. Data is recorded during calibration checks, and zero and span adjustments.	40 CFR Section 60.48b(k); Minn. R. 7011.0565
<p>The Permittee shall follow the actions and recordkeeping specified in the Performance Testing and Continuous Emissions Monitoring Exemption Response, and attached as Appendix B.</p> <p>These exemptions may apply to the first time units are operated and include a waiver of the 30-day testing for sulfur dioxide and nitrogen oxides, a waiver of particulate matter testing at each temporary boiler, and a waiver of continuous emissions monitoring for sulfur dioxide, nitrogen oxides and opacity.</p>	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9** 12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Following the date on which the initial performance test is completed or required to be completed under 40 CFR Section 60.8, whichever date comes first, the Permittee shall upon request determine compliance with the NOx standards under 40 CFR Section 60.44b through the use of a 30-day performance test. During periods when performance tests are not requested, NOx emissions data collected pursuant to 40 CFR Sections 60.48b(g)(1) or 60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NOx emission standards. A new 30-day rolling average emission rate is calculated each operating day as the average of all the hourly NOx emission data for the preceding 30 operating days.	40 CFR Section 60.46b(e)(4); Minn. R. 7011.0565
REPORTING AND RECORDKEEPING	hdr
The Permittee shall submit notification of the date of initial startup, as provided by 40 CFR Section 60.7. This notification shall include: 1. The design heat capacity of the affected facility and identification of the fuels to be combusted in the affected facility; 2. The annual capacity factor at which the Permittee anticipates operating the facility based on all fuels fired and based on each individual fuel burned.	40 CFR Section 60.49b(a)(1)(3); Minn. R. 7011.0565
The Permittee shall submit to the Administrator the PM and NOx performance data from the initial performance test and the performance evaluation of the CEMs using the applicable specifications.	40 CFR Section 60.49b(b); Minn. R. 7011.0565
Except as provided under paragraph (p) of 40 CFR Section 60.49b, the Permittee shall maintain records of the following information for each steam generating unit operating day: 1. Calendar date; 2. Average hourly NOx emission rates (lb/mmBtu heat input) measured or predicted 3. The 30-day average NOx emission rates (lb/mmBtu heat input) calculated at the end of each steam generating unit operating day from the measured or predicted hourly NOx emission rates for the preceding 30 steam generating unit operating days; 4. Identification of the steam generating unit operating days when the calculated 30-day average NOx emission rates are in excess of the NOx emission standards under 40 CFR Section 60.44b, with reasons for such excess emissions as well as a description of corrective actions taken; (continued below)	40 CFR Section 60.49b(g); Minn. R. 7011.0565
(continued from above) 5. Identification of the steam generating unit operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken; 6. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data; 7. Identification of "F" factor used for calculations, method of determination, and type of fuel combusted; (continued below)	40 CFR Section 60.49b(g); Minn. R. 7011.0565
(continued from above) 8) Identification of the times when the pollutant concentration exceeded full span of the CEMs; 9) Description of any modifications to the CEMs that could affect the ability of the CEMs to comply with Performance Specification 2 or 3; 10) Results of daily CEMs drift tests and quarterly accuracy assessments as required under Appendix F, Procedure 1.	40 CFR Section 60.49b(g); Minn. R. 7011.0565
The Permittee may submit electronic quarterly reports for NOx and/or O2 in lieu of submitting the written reports required under paragraphs (h), (i), (j), (k) or (l) of this section. The format of each quarterly electronic report shall be coordinated with the MPCA. The electronic report(s) shall be submitted no later than 30 days after the end of the calendar quarter and shall be accompanied by a certification statement from the Permittee, indicating whether compliance with the applicable emission standards and minimum data requirements of this subpart was achieved during the reporting period. Before submitting reports in the electronic format, the Permittee shall coordinate with the MPCA to obtain their agreement to submit reports in this alternative format.	40 CFR Section 60.49b(v); Minn. R. 7011.0565
The reporting period for the reports required under this subpart is each 6 month period. All reports shall be submitted and shall be postmarked by the 30th day following the end of the reporting period.	40 CFR Section 60.49b(w); Minn. R. 7011.0565

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: GP 003 CEMS for Temporary Package Boilers Subject to Db

Associated Items: MR 001 Temp Boiler #2 NOx
 MR 002 Temp Boiler #2 O2
 MR 003 Temp Boiler #3 NOx
 MR 004 Temp Boiler #3 O2
 MR 005 Temp Boiler #4 NOx
 MR 006 Temp Boiler #4 O2
 MR 007 Temp Boiler #5 NOx
 MR 008 Temp Boiler #5 O2
 MR 009 Temp Boiler #2 PM
 MR 010 Temp Boiler #3 PM
 MR 011 Temp Boiler #4 PM
 MR 012 Temp Boiler #5 PM

What to do	Why to do it
The following requirements, found in GP 003, are applicable to all the CEMS (PM, NOx, O2) for all four temporary boilers (EU 006 - EU 009). If the temporary boilers are not installed, these requirements are not applicable.	hdr
CEMS Installation: Install and operate NOx and PM CEMS.	Minn. R. 7017.1006
CEMS Monitor Design: Each CEMS shall be designed to complete a minimum of one cycle of sampling, analyzing, and data recording in each 15-minute period.	Minn. R. 7017.1140; 40 CFR Section 60.13(e)(2)
Installation Notification: due 60 days before installing the continuous emissions monitoring system. The notification shall include plans and drawings of the system.	Minn. R. 7017.1040, subp. 1
CEMS Certification Test: due 120 days after the first calendar quarter following CEMS Installation. (This requirement is as stringent as that of Minn. R. 7017.1050, subp. 1 requiring testing within 90 days after the due date of the first excess emissions report required for the CEMS.)	40 CFR Sect. 60.13(b); Minn. R. 7017.1050, subp. 1
CEMS Certification Test Plan: due 30 days before CEMS Certification Test CEMS Certification Test Pretest Meeting: due 7 days before CEMS Certification Test CEMS Certification Test Report: due 45 days after CEMS Certification Test CEMS Certification Test Report - Microfiche Copy: due 105 days after CEMS Certification Test The Notification, Test Plan, and Test Report may be submitted in alternate format as allowed by Minn. R. 7017.1120, subp. 2	40 CFR Sect. 60.7(a)(5); Minn. R. 7017.1060, subp. 1-3; Minn. R. 7017.1080, subp. 1-4
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.	40 CFR Section 60.13(e), Minn. R. 7017.1090, subp. 1
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 Part 60, Appendix F, Sect. 3. The plan shall include the manufacturer's spare parts list for each CEMS and require that those parts be kept at the facility unless the Commissioner gives written approval to exclude specific spare parts from the list.	Minn. R. 7017.1170, subp. 2; 40 CFR pt. 60, App. F; section 3
CEMS QA/QC: The Permittee is subject to the performance specifications listed in 40 CFR pt. 60, Appendix B and shall operate, calibrate, and maintain each CEMS according to the QA/QC procedures in 40 CFR pt. 60, Appendix F as amended and maintain a written QA/QC program available in a form suitable for inspection.	40 CFR pt. 60, Appendix F; 40 CFR Section 60.13(a)
CEMS Daily Calibration Drift Test: Check the zero (low level value between 0 and 20 percent of span value) and span (50 to 100 percent of span value) calibration drifts at least once daily. The zero and span must, at a minimum, be adjusted whenever the drift exceeds two times the limit specified in 40 CFR pt. 60, Appendix F shall be used to determine out-of-control periods for CEMS. Refer to Db Boiler, 40 CFR Section 48b(e)(2) for span values for nitrogen oxides.	40 CFR pt. 60, Appendix F, section 4.1; 40 CFR Section 60.13(d)(1) regarding CEMS; Minn. R. 7017.1170, subp. 3

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Cylinder Gas Audit (CGA): due before end of each calendar quarter following CEMS certification test for each CEMS (MR 001-012). A CGA is not required during any calendar quarter in which a RATA was performed.	40 CFR pt. 60, Appendix F, section 5.1.2; Minn. R. 7017.1170, subp. 4
CEMS Relative Accuracy Test Audit (RATA): due before end of each year following CEM Certification Test The first RATA is due within 365 days of the CEMS certification. A CGA is not required during any calendar half-year in which a RATA was performed. A CGA shall be conducted according to the procedures in CFR, Title 40, part 60, Appendix F, section 5.1.2.	40 CFR pt. 60, Appendix F, section 5.1.2; Minn. R. 7017.1170, subp. 4
Relative Accuracy Test Audit (RATA) Notification: due 30 days before CEMS Relative Accuracy Test Audit (RATA) .	Minn. R. 7017.1180, subp. 2
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; 40 CFR Section 60.7(f)
Monitoring Data: Reduce all NOx, PM and O2 data to 1-hour averages, in accordance with 40 CFR Section 60.13(h). 1-hour averages shall be computed from four or more data points equally spaced over each 1-hour period.	40 CFR Section 60.13(h) regarding continuous monitoring systems other than COMS.

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: GP 004 MRs for Temporary Package Boilers Subject to Db

Associated Items: MR 001 Temp Boiler #2 NOx
MR 002 Temp Boiler #2 O2
MR 003 Temp Boiler #3 NOx
MR 004 Temp Boiler #3 O2
MR 005 Temp Boiler #4 NOx
MR 006 Temp Boiler #4 O2
MR 007 Temp Boiler #5 NOx
MR 008 Temp Boiler #5 O2
MR 009 Temp Boiler #2 PM
MR 010 Temp Boiler #3 PM
MR 011 Temp Boiler #4 PM
MR 012 Temp Boiler #5 PM

What to do	Why to do it
The following requirements, found in GP 004, are applicable to all the CEMS (PM, NOx, O2) for all four temporary boilers (EU 006 - EU 009). If the temporary boilers are not installed, these requirements are not applicable.	hdr
Cylinder Gas Audit (CGA) Results Summary: due 30 days after end of each calendar quarter following Cylinder Gas Audit (CGA).	Minn. R. 7017.1180, subp. 1
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

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: EU 001 Cardboard Paper Line (CPL)**Associated Items:** GP 001 Total Facility VOC Limits

What to do	Why to do it
EMISSION LIMITS	hdr
Volatile Organic Compounds: less than or equal to 1.11 lbs/ton using 12-month Rolling Average VOCs in process chemicals/ton of paper produced. (BACT LIMIT)	Title I Condition: 40 CFR Section 52.21 & Minn. R. 7007.3000
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
RECORDKEEPING REQUIREMENT	hdr
VOC Emission Calculation and Recordkeeping for BACT Limit: The Permittee shall calculate and record the daily and 12-month rolling average VOC emissions from EU 001. The records shall be maintained in either electronic or paper format, unless electronic or paper records are expressly prohibited.	Title I Condition: 40 CFR Section 52.21 & Minn. R. 7007.3000

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: EU 010 Biogas Flare**Associated Items:** SV 013 Biogas Flare

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)

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

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: EU 011 Flash Aerator**Associated Items:** SV 014 Flash Aerator

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16**

12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

Subject Item: EU 012 Generator**Associated Items:** SV 015 Generator

What to do	Why to do it
EMISSION LIMITS	hdr
Nitrogen Oxides: less than or equal to 2.0 grams/horsepower-hour or 150 ppmvd at 15% oxygen.	40 CFR Section 60.4233(e)
Carbon Monoxide: less than or equal to 5.0 grams/horsepower-hour or 610 ppmvd at 15% oxygen.	40 CFR Section 60.4233(e)
Volatile Organic Compounds: less than or equal to 1.0 grams/horsepower-hour or 80 ppmvd at 15% oxygen (excluding formaldehyde).	40 CFR Section 60.4233(e)
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.50 lbs/million Btu heat input using 3-hour Rolling Average . The potential to emit from the unit is 0.89 lb/hr due to equipment design and allowable fuels.	Minn. R. 7011.2300, subp. 2
MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS	hdr
Fuel type: Biogas only by design.	Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel type and usage on a monthly basis.	Minn. R. 7007.0800, subp. 5
Notification of any physical or operational change which increases emission rate: due 60 days (or as soon as practical) before the change is commenced.	40 CFR Section 60.7(a)(4); Minn. R. 7019.0100, subp. 1
Notification of Anticipated Date for Conducting Opacity Observations: due 30 day prior to observation date	40 CFR Section 60.7(a)(6); Minn. R. 7019.0100, subp. 1
The Permittee shall keep records of the following: (1) All notifications submitted to comply with Subpart JJJJ and all documentation supporting any notification; (2) Maintenance conducted on the engine; (3) If the engine is certified, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR Parts 90 and 1048; and (4) If the engine is non-certified or is certified but operating in a non-certified manner and subject to 40 CFR Section 60.4243(a), documentation that the engine meets the emission standards.	40 CFR Section 60.4245(a)
The Permittee that are subject to performance testing must submit a copy of each performance test as conducted in 40 CFR Section 60.4244 within 60 days after the test has been completed.	40 CFR Section 60.4245(d)
If a non-certified engine is purchased, the Permittee must do the following the demonstrate compliance with Subpart JJJJ: -Keep a maintenance plan and records of conducted maintenance; and -To the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions; and -Conduct an initial performance test within 1 year of engine startup and conduct subsequent performance testing every 8760 hours or 3 years, whichever comes first, thereafter. The testing must follow the procedures in 40 CFR Section 60.4244, as applicable.	40 CFR Section 60.4243(b)(2)(ii)
Recordkeeping: Maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the facility including; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.	40 CFR Section 60.7(b), Minn. R. 7019.0100, subp. 1
Recordkeeping: Maintain a file of all measurements, maintenance, reports and records for at least five years. 40 CFR Section 60.7(f) specifies two years.	Minn. R. 7997.0800, subp. 5(C); meets requirements of 40 CFR Section 60.7(f); Minn. R. 7019.0100, subp. 1
Opacity Compliance: Demonstrate compliance with opacity standards using Reference Method 9.	40 CFR Section 60.11; Minn. R. 7017.2015
No owner or operator shall build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.	40 CFR Section 60.12; Minn. R. 7011.0050

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Liberty Paper Inc
Permit Number: 14100036 - 006

At the time of permit issuance, EU 012 is considered new affected sources under 40 CFR pt. 63, subp. ZZZZ as defined at 40 CFR Section 63.6590(a)(2)(iii). However, these units meet the criteria in 40 CFR Section 63.6590(b)(3), so no limits, recordkeeping, or notifications from 40 CFR pt, 63, subp. ZZZZ apply to these units.	40 CFR Section 63.6590(a)(2)(iii) and (b)(3); Minn. R. 7011.8150
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TABLE B: SUBMITTALS**B-1** 12/12/12

Facility Name: Liberty Paper Inc
Permit Number: 14100036 - 006

Also, where required by an applicable rule or permit condition, send to the Permit Document Coordinator 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:

Fiscal Services
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** 12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

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	EU012, GP002
Notification of the Date Construction Began	due 30 days after Start Of Construction. Submit the name and number of each unit and the date construction of each unit began.	GP002
Notification of the Date Construction Began	due 30 days after Start Of Construction. This is required only if the engine has not been certified by the manufacturer to meet the emission standards in 40 CFR Section 60.4341. Include the following: (1) Name and address of the owner/operator; (2) Address of the affected source; (3) Engine information including make, model, engine family, serial number, model year, maximum engine power, and engine displacement; (4) Emission control equipment; and (5) Fuel used.	EU012

TABLE B: RECURRENT SUBMITTALS**B-3** 12/12/12

Facility Name: Liberty Paper Inc

Permit Number: 14100036 - 006

What to send	When to send	Portion of Facility Affected
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Initial Startup of the Monitor Cover letter, certification, and summary of exceedances shall be submitted in hardcopy format; all other information may be submitted electronically. Shall be certified per Minn. R. 7007.0500, subp. 3.	GP002
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Initial Startup of the Monitor. Submit Deviations Reporting Form DRF-1 as amended. The EER shall indicate all periods of monitor bypass and all periods of exceedances of a limit including exceedances allowed by an applicable standard, i.e. during start-up, shutdown, and malfunctions. The EER must be submitted even if there were no excess emissions, downtime or bypasses during the quarter.	GP003
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 02/07/2002. 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
Annual Report	due 30 days after end of each year following Permit Issuance. The Permittee shall submit an annual report by January 31st that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall include the emission unit, stack/vent, group, and control equipment data for any new or replaced units or control devices. The report shall document the VOC and HAP 12-month rolling sum calculations for the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor source status for New Source Review and NESHAPS.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 02/07/2002 (for the previous calendar year). The Permittee shall submit this 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 MATERIAL

Facility Name: Liberty Paper, Inc.

Permit Number: 14100036-006

Appendix A – Operator's Summary (*not used in this permit*)

Appendix B – Performance Testing and Continuous Emissions Monitoring
Exemption Response from US EPA (letter is attached below)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

SEP 17 2010

REPLY TO THE ATTENTION OF:
(AE-17J)

Liesch Associated, Inc
Attn.: Mr. David C. Reynolds
13400 15th Avenue North
Minneapolis, Minnesota 55441

Re: Testing/monitoring exemption request for temporary boilers at Liberty Paper, Inc.

Dear Mr. Reynolds:

I am writing in response to your August 19, 2010 letter requesting an exemption from certain testing and monitoring requirements contained in the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units (40 C.F.R. Part 60, Subpart Db). You are requesting this exemption on behalf of Liberty Paper, Inc. located at 13500 Liberty Lane, Becker, Minnesota 55308. Your request is for two temporary boilers, each with a heat input of 126 million British thermal units per hour (MMBtu/hr), which are subject to 40 C.F.R. Part 60, Subpart Db. Your letter states Liberty Paper, Inc. applied for an air permit, which allows up to four boilers, each with a heat input of 168 MMBtu/hr, to provide steam during this and possible future outages at Xcel Energy. The application states the boilers will only combust natural gas or propane as fuel and requests a fuel use limit to remain a synthetic minor source for PSD.

Your letter and telephone conversations between you and Mr. Kevin Vuilleumier of my staff clarified that you are requesting exemptions from the 30-day testing requirement for sulfur dioxide and nitrogen oxide since the boilers are only expected to operate for an estimated eight days. You are also requesting an exemption from the testing requirement for particulate matter since the boilers are only expected to operate for an estimated eight days and will be fired with propane as the only fuel. Finally, you are requesting exemptions from the monitoring requirements for sulfur dioxide, nitrogen oxide and opacity at the two temporary boilers.

Determination

The United States Environmental Protection Agency has reviewed the information you submitted, the underlying regulations and other applicable requirements. Based on our review, we approve your requests subject to the following requirements.

Waiver of the 30-day testing for sulfur dioxide and nitrogen oxide:

EPA approves your request to waive the 30-day testing requirement for sulfur dioxide and nitrogen oxide at the two temporary boilers planned for use at Liberty Paper, Inc. for steam generation. It is apparent that Liberty Paper, Inc. will not be able to test for the full 30-day period if the temporary boilers are only operated for the estimated eight days. Additionally, your letter indicates the boilers will use only propane as fuel so sulfur dioxide should not be an issue at either boiler. However, firing propane can result in significant emissions of nitrogen oxides. Because of this potential, EPA requires Liberty Paper, Inc. to conduct continuous emissions testing for nitrogen oxides using an instrumental test method (i.e. Method 7E at 40 C.F.R. Part 60, Appendix A) at each temporary boiler for the entire period of each boiler's operation. Data must be reduced to one-hour averages. Those one-hour averages will be used to evaluate compliance with the nitrogen oxide limit at 40 C.F.R. § 60.44b (0.10 lbs/MMBtu) on a three-hour rolling average basis.

Emissions of nitrogen oxides must be recorded and reported as part of Liberty Paper Inc.'s emissions inventory and considered for evaluating whether operation of these temporary boilers triggers any other applicable regulations (for example, Title V or Prevention of Significant Deterioration of Air Quality). A letter summarizing the total operating time of each temporary boiler, the total nitrogen oxide emissions resulting from operation of each temporary boiler and a statement regarding whether the boilers are retained on-site after use or sent back to the provider must be submitted to EPA within 60-days after boiler operation ceases. The letter must be sent to:

U.S. EPA, Region 5
Attn: Mr. Kevin Vuilleumier (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604

Waiver of particulate matter testing at each temporary boiler:

EPA approves your request to waive the particulate matter testing requirement at each temporary boiler. Since each temporary boiler will only be combusting propane for fuel, particulate matter is not expected to be a concern for the short-term operation of the temporary boilers.

Waiver of continuous emissions monitoring for sulfur dioxide, nitrogen oxides and opacity:

EPA approves your request to waive the requirement to install, operate and maintain a continuous emission monitoring system for sulfur dioxide and a continuous opacity monitoring system for opacity at each temporary boiler for the duration of the temporary boiler operations (estimated to be eight days). However, if there are any instances during operation of the temporary boilers where opacity is observed exiting either temporary boiler stack, Liberty Paper, Inc. must immediately begin performing visible emissions readings, with a certified visible emission reader, on that temporary boiler stack for the entire period of the event. Additionally, Liberty Paper, Inc. is expected to continuously comply with the requirements at 40 C.F.R. § 60.11(d), which

APPENDIX C

Insignificant Activities and Likely Applicable Requirements

Under Minn. R. 7007.1250, subp. 1(A), the Permittee may add insignificant activities to the stationary source throughout the term of the permit without getting permit amendments. Certain exclusions apply and are listed in Minn. R. 7007.1250, subp.2. The following table is a listing of the insignificant activities that the Permittee is somewhat likely to add and their associated applicable requirements.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Likely Applicable Requirement	
3(B)(2)	Space Heaters <ul style="list-style-type: none"> Heaters with a heat input of 35,000 Btu/hr each (19) 	Minn. R. 7011.0510/0515	
E(4)	Temporary propane tanks	Minn. R. 7011.1505	
4	Individual emissions units at a stationary source, each of which has: <p>A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide;</p> <p>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;</p> <p>C. For hazardous air pollutants, emissions units with... and</p> <p>D. potential emissions up to 10,000 tons/yr or actual emissions up to 1,000 tons/yr CO₂e.</p> <p><i>The following PM/PM₁₀ sources have potential controlled emissions less than 1 tpy of PM/PM₁₀, and so it follows that actual emissions are less than 1 tpy for each :</i></p> <ul style="list-style-type: none"> <i>LPI uses a few gallons of materials for vehicle maintenance activities per year which contain VOCs and HAPs.</i> 	Minn. R. 7011.0710/0715	