

**AIR EMISSION PERMIT NO. 06100001- 001
IS ISSUED TO**

Blandin Paper Company

Blandin Paper Company
115 Southwest 1st Street
Grand Rapids, Itasca County, Minnesota 55744-3662

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

Permit Type	Application Date
Total Facility Operating Permit	April 17, 1995

This permit authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit and with all general conditions listed in Minn. R. 7007.0800, subp. 16, [and all standard permit requirements listed in 40 CFR § 70.6\(a\)](#), which are incorporated by reference. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal ; Part 70

Issue Date: **June 14, 1999**

Expiration: **June 14, 2004**

All Title I Conditions do not expire.

Michael J. Sandusky
Division Manager
Air Quality Division

for Karen A. Struders
Commissioner
Minnesota Pollution Control Agency

BAB:yma

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

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 rule 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. Any requirements which have been determined not to apply are listed in Table A of this permit.

The permit shield, however does not apply to: Minn. R. ch. 7030 (Noise Pollution Control).

FACILITY DESCRIPTION:

Blandin Paper Company (Blandin) operates a groundwood pulp and papermill in Grand Rapids, Minnesota. Blandin was initially built and began operation under the name Itasca Paper Company in 1902. In 1933 the company became Blandin Paper Company and in 1997 the plant was purchased by the UPM Kymmene Group based in Finland and the plant name was changed to Blandin Paper Company a Member of the UPM Kymmene Group. Blandin produces groundwood pulp and combines it with purchased kraft pulp to produce paper of advertising supplement, catalog, and magazine quality. Raw materials used to produce the paper include wood, clay, starch, and pigments.

The main contributing air emission sources at the plant consist of four boilers (2 natural gas-fired units and 2 wood/coal-fired units), a pressurized groundwood (PGW) mill, four paper machines, and four coater/dryers. Blandin has a potential-to-emit (PTE) of greater than 250 tons per year for all criteria pollutants except lead and thus is a major source under the federal Prevention of Significant Deterioration (PSD) program. The two wood/coal boilers are New Source Performance Standard (NSPS) units (Subpart D) and the facility is a major hazardous air pollutant (HAP) source and is thus applicable to the National Emission Standards for Hazardous Air Pollutants (NESHAP) program and is thus potentially subject to a Maximum Achievable Control Technology (MACT) standard which is yet to be promulgated.

In terms of pollution control equipment, the paper machines, PGW, coater/dryers, and the natural gas-fired only boilers are all uncontrolled sources. The main power boilers (the wood/coal-fired units) are controlled by high efficiency electrostatic precipitators.

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 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
What to do	Why to do it
Comply with the O&M Plan: Follow the actions and record keeping specified in the O&M plan. The plan may be amended with the Agency's written approval.	Minn. R. 7007.0800, subp. 14; Minn. R. 7007.0800, subp. 16(J)
Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Agency's approval. If the Agency determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Agency.	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, 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)
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
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

<p>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:</p> <ol style="list-style-type: none"> 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. 	<p>Minn. R. 7019.1000, subp. 1</p>
<p>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.</p>	<p>Minn. R. 7019.1000, subp. 4</p>
<p>Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.</p>	<p>Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)</p>
<p>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.</p>	<p>Minn. R. 7011.0150</p>
<p>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.</p>	<p>Minn. R. 7007.1150 through Minn. R. 7007.1500</p>
<p>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).</p>	<p>Minn. R. 7007.1400, subp. 1(H)</p>
<p>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.</p>	<p>Minn. R. 7007. 0800, subp. 5(B)</p>
<p>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).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>
<p>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.</p>	<p>Minn. R. 7030.0010 - 7030.0080</p>
<p>The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.</p>	<p>Minn. R. 7007.0800, subp. 16</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 9(A)</p>
<p>Emission Fees: due 60 days after receipt of an MPCA bill.</p>	<p>Minn. R. 7002.0005 through Minn. R. 7002.0095</p>
<p>The Permittee may be required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR pt. 68. Each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, shall design and implement an accidental release prevention program. The RMPs must be submitted to a centralized location as specified by US EPA. RMP submittal information may be obtained at http://www.epa.gov/swercepp or by calling 1-800-424-9346. These requirements must be complied with no later than the latest of the following dates: (1) June 21, 1999; (2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or (3) The date on which a regulated substance is first present above a threshold quantity in a process.</p>	<p>40 CFR pt. 68</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Subject Item: GP 001 Paper Machines/Pressurized Groundwood Mills

- Associated Items:** EU 007 Paper Machine #3
 EU 008 Paper Machine #4
 EU 009 Paper Machine #5
 EU 010 Paper Machine #6
 EU 015 Pressurized Groundwood Mill
 SV 006
 SV 007
 SV 008
 SV 009
 SV 010
 SV 011
 SV 012
 SV 013
 SV 014
 SV 015
 SV 035

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. 7011.0735.	Minn. R. 7011.0710, subp. 1.A.
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity (this opacity limit applies to equipment installed prior to 1969 and thus applies to EU 007 and EU 008).	Minn. R. 7011.0710, subp. 1.B.
Opacity: less than or equal to 20 percent opacity (this opacity limit applies to equipment installed after 1969 and thus applies to EU 009 and EU 010).	Minn. R. 7011.0715, subp. 1.B.
Periodic Monitoring: the Permittee shall maintain proper maintenance of the paper machines (EU 007 through EU 010) and the pressurized groundwood mills (EU 015) so as to prevent excessive amounts of particulate matter from being emitted from the stack/vents listed above under Associated Items.	Minn. R. 7007.0800, subp. 4
Temperature: greater than or equal to 110 degrees F using 365-day Rolling Average for the process water exiting the combined heat recovery system for No.'s 3 & 4 paper machines (EU 007 and EU 008), the heat recovery system for No. 5 paper machine (EU 009), the heat recovery system for No. 6 paper machine (EU 010), and the heat recovery system for the PGW mill (EU 015).	Title I Condition: 40 CFR Section 52.21 to avoid classification as a major modification under PSD
Operating Hours: greater than or equal to 76 hours/day using 365-day Rolling Average for all four heat recovery units combined.	Title I Condition: 40 CFR Section 52.21 to avoid classification as a major modification
Monitoring and Record Keeping: the Permittee shall monitor and record daily the heat recovery system outlet water temperature and the hours of operation on all four heat recovery systems.	Minn. R. 7007.0800, subp. 4, Minn. R. 7007.0800, subp. 5
Annual Energy Audit and Report: the Permittee shall perform an annual audit of the four heat exchange systems to determine if the total steam conservation achieved is at least 34 MMBtu/hour. The testing shall be performed by an independent contractor during the third quarter of each year. If the audit does not show the 34 MMBtu/hour steam conservation, a permit amendment application shall be submitted within 120 days to address the problem.	Title I Condition: 40 CFR Section 52.21 to avoid classification as a major modification

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Subject Item: GP 002 Coaters/Dryers

- Associated Items:** EU 011 Coater/Dryer #3
 EU 012 Coater/Dryer #4
 EU 013 Coater/Dryer #5
 EU 014 Coater/Dryer #6
 SV 016
 SV 017
 SV 018
 SV 019
 SV 020
 SV 021
 SV 022
 SV 023
 SV 024
 SV 025
 SV 026
 SV 027
 SV 028
 SV 029
 SV 030
 SV 031
 SV 032
 SV 033
 SV 034

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. 7011.0735.	Minn. R. 7011.0710, subp. 1.A.
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity (this opacity limit applies to equipment installed prior to 1969 and thus applies to EU 011 and EU 012).	Minn. R. 7011.0710, subp. 1.B.
Opacity: less than or equal to 20 percent opacity (this opacity limit applies to equipment installed after 1969 and thus applies to EU 013 and EU 014).	Minn. R. 7011.0715, subp. 1.B.
Periodic Monitoring: the Permittee shall maintain proper maintenance of the coater/dryers (EU 011 through EU 014) so as to prevent excessive amounts of particulate matter from being emitted from the stack/vents listed above under Associated Items.	Minn. R. 7007.0800, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Subject Item: GP 003 Solid Fuel Power Boilers

- Associated Items:** CE 001 Electrostatic Precipitator - High Efficiency
 CE 002 Electrostatic Precipitator - High Efficiency
 CE 003 Centrifugal Collector - High Efficiency
 CE 004 Centrifugal Collector - High Efficiency
 EU 003 Boiler #5
 EU 004 Boiler #6
 MR 004 Boiler 5
 MR 005 Boiler 5
 MR 006 Boiler 5
 MR 007 Boiler 6
 MR 008 Boiler 6
 MR 009 Boiler 6
 SV 003

What to do	Why to do it
A. POLLUTANT LIMITS	hdr
Total Particulate Matter: less than or equal to 0.1 lbs/million Btu heat input (this limit applies individually to each emission unit listed above under Associated Items).	40 CFR Section 60.42(a)(1)
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 27 percent opacity (this limit applies individually to each emission unit listed above under Associated Items).	40 CFR Section 60.42(a)(2)
Sulfur Dioxide: less than or equal to 1.2 lbs/million Btu heat input using 3-hour Rolling Average (this limit applies individually to each emission unit listed above under Associated Items).	40 CFR Section 60.43(a)(2)
Nitrogen Oxides: less than or equal to 0.7 lbs/million Btu heat input using 3-hour Rolling Average (this limit applies individually to each emission unit listed above under Associated Items).	40 CFR Section 60.44(a)(3)
Carbon Monoxide: less than or equal to 1300 parts per million on a dry, 8-hour discrete average basis (this limit applies individually to each emission unit listed above under Associated Items).	Minn. Stat. Section 116.07, subp. 4a and Minn. R. 7007.0800, subp. 2
B. OPERATIONAL REQUIREMENTS	hdr
Fuels Allowed: the Permittee shall only combust wood waste (includes creosote treated railroad ties, waste paper, and paper roll fiber cores), western subbituminous coal, and on-site generated waste (includes petroleum derived waste oil/sorbents and ignitable-only solvents) in EU 003.	Minn. R. 7007.0800, subp. 2
C. PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due before end of each 60 months following Permit Issuance to measure particulate matter and carbon monoxide emissions from EU 003 and EU 004 operating simultaneously and venting through SV 003. The tests shall be conducted at an interval not to exceed 60 months between test dates.	Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before end of each 60 months following Permit Issuance. Due 7 days before each Performance Test.	Minn. R. 7017.2030, subp. 4
D. CONTINUOUS EMISSIONS MONITORING	hdr
Emissions Monitoring: The owner or operator shall use a COMS to measure opacity emissions from SV003.	Minn. R. 7017.1000, subp. 1; 40 CFR Section 60.45(a)
COMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all COMS shall be in continuous operation.	Minn. R. 7007.0800, subp. 2; 40 CFR Section 60.13(e)
COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the calibration drift (CD) exceeds twice the specification of PS-1 of 40 CFR 60, Appendix B.	Minn. R. 7017.1000; 40 CFR Section 60.13(d)(2)
COMS Calibration Error Audit: due before end of each calendar half-year following Permit Issuance. Conduct audits at least 3 months apart but no greater than 8 months apart.	Minn. R. 7007.0800, subp. 2
COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to 6 minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the 6 minute averaging period.	Minn. R. 7007.0800, subp. 2; 40 CFR Section 60.13(e)(1); 40 CFR Section 60.13(h)

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Recordkeeping: The owner or operator must retain records of all COMS 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. 7007.0800, subp. 5
Cylinder Gas Audit: due before end of each calendar half-year following Permit Issuance. Conduct CGA at least 3 months apart and not greater than 8 months apart. Follow the procedures in 40 CFR pt. 60, Appendix F.	Minn. R. 7007.0800, subp. 2
Emissions Monitoring: The owner or operator shall use NOx and SO2 CEMS to measure NOx and SO2 emissions from EU003 and EU 004.	Minn. R. 7017.1000, subp. 1
CEMS Relative Accuracy Test Audit (RATA): due before end of each calendar year following Permit Issuance for the monitors on EU 003 and EU 004. If the relative accuracy is 15% or less the next CEMS RATA is not due for 24 months. Follow the procedures in 40 CFR pt. 60, Appendix B and Appendix F.	Minn. R. 7007.0800, subp. 2
CEMS Continuous Operation: Except for system breakdowns, repairs, calibration checks, and zero and span adjustments, all CEMS shall be in continuous operation.	Minn. R. 7017.1000, subp. 6
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. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Subject Item: EU 001 Boiler #3**Associated Items: SV 001**

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Fuels Allowed: the Permittee shall only combust natural gas in EU 001.	Minn. R. 7007.0800, subp. 2
Record Keeping: the Permittee shall retain records sufficient enough to demonstrate what fuel types were combusted in EU 001.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

Subject Item: EU 002 Boiler #4**Associated Items: SV 002**

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Fuels Allowed: the Permittee shall only combust natural gas in EU 002.	Minn. R. 7007.0800, subp. 2
Record Keeping: the Permittee shall retain records sufficient enough to demonstrate what fuel types were combusted in EU 002.	Minn. R. 7007.0800, subp. 5

TABLE B: SUBMITTALS

06/14/99

Facility Name: Blandin Paper Company
Permit Number: 06100001 - 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

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 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
Computer Dispersion Modeling Protocol	due 1,096 days after Permit Issuance for PM-10, SO ₂ , NO _x . This protocol will describe the proposed modeling methodology and input data, in accordance with all requirements of 40 CFR pt. 51, App. W. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Computer Dispersion Modeling Results	due 1,462 days after Permit Issuance PM-10, SO ₂ , and NO _x . To be submitted after the MPCA has reviewed and approved the modeling protocol. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Fugitive Control Plan	due 60 days after Permit Issuance The plan shall identify all fugitive emission sources, primary and contingent control measures, and record keeping. The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Agency's approval. If the Agency determines the permittee is out of compliance with Minn. R. 7011.0150 or the fugitive emission control plan, then the permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors.	Total Facility
Operation and Maintenance Plan	due 90 days after Permit Issuance summarizing the operation and maintenance for all pollution control equipment and emission unit groups GP 001 and GP 002. The plan should consider manufacturer's recommended ranges for control equipment operating parameters such as pressure drop, liquid flow rate, and liquid supply pressure; corrective action procedures to return control equipment parameters to within specified range(s); corrective action procedures to be followed in the event of a malfunction or breakdown; a description of inspection procedures to be followed; and records kept to demonstrate plan implementation.	Total Facility
Relative Accuracy Test Audit (RATA) Notification	due 30 days before CEMS Relative Accuracy Test Audit (RATA)	GP003

TABLE B: RECURRENT SUBMITTALS

06/14/99

Facility Name: Blandin Paper Company

Permit Number: 06100001 - 001

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 Permit Issuance for the monitors on EU 003 and EU 004 (Submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of monitor bypass and all periods of exceedances of the limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	GP003
COMS Calibration Error Audit Results Summary	due 30 days after end of each calendar half-year following COMS Calibration Error Audit.	GP003
Cylinder Gas Audit (CGA) Results Summary	due 30 days after end of each calendar half-year following Cylinder Gas Audit	GP003
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 31 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
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Total Facility
Relative Accuracy Test Audit (RATA) Results Summary	due 30 days after end of each calendar year following CEMS Relative Accuracy Test Audit (RATA).	GP003
Performance Test Notification (written)	due 30 days before end of each 60 months following Permit Issuance. Due 30 days before each Performance Test.	GP003
Performance Test Plan	due 30 days before end of each 60 months following Permit Issuance. Due 30 days before each Performance Test.	GP003
Performance Test Report - Microfiche Copy	due 105 days after end of each 60 months following Performance Test. Due 105 days after each Performance Test.	GP003
Performance Test Report	due 45 days after end of each 60 months following Performance Test. Due 45 days after each Performance Test.	GP003

APPENDIX MATERIAL

Facility Name: Blandin Paper/Rapids Energy Center

Permit Number: 06100001-004

Insignificant Activities List

M.R. 7007.1300, subp. 3 - Insignificant Activities Required to be Listed

- A. Fuel Use: Space heaters fueled by kerosene, natural gas, or propane:
 - A#1 Space heater with a total maximum capacity of 20 MMBtu/hr
 - A#2 Several natural gas fired space heaters used for comfort heat only.

- D. Finishing Operations: Equipment vented inside a building used for buffing, polishing, carving, cutting, drilling, machining, routing, sanding sawing, surface grinding, or turning of ceramic precision parts, leather, metals, plastics, masonry, carbon, wood, or glass, provided that emissions from the equipment are:
 - a. filtered through an air cleaning system; and
 - b. vented inside of the building 100% of the time
 - D#1 Paper Trimmers

- E. Storage tanks:
 - 2. Non-hazardous air pollutant VOC storage tanks with a combines total tankage capacity not more than 10,000 gallons of non-hazardous air pollutant VOC's and with a vapor pressure of not more than 1.0 psia at 60 degrees F.

FACILITY NUMBER	LOCATION	CONTENTS	SIZE (GAL)	SECONDARY CONTAINMENT	COLOR
MAIN MILL					
26	Main	#1 Dye Run Tank	225	Bldg	Silver
27	Main	#2 Dye Run Tank	225	Bldg	Silver
28	Main	#3 Dye Run Tank	225	Bldg	Silver
29	Main	#4 Dye Run Tank	225	Bldg	Silver
31	Bsmt	Kerosene	92	Bldg	Green

NO. 5 PAPER MACHING BUILDING

16	Grd Flr	Kerosene	92	Bldg	Green
18	Mez	Ret. Aid Make Down	1982	Bldg	Silver
19	Mez	#1 Dye Make Down	360	Bldg	Silver
20	Mez	#2 Dye Make Down	360	Bldg	Silver
21	Opr Flr	Ret. Aid Tank		Bldg	Silver

COATING PREP

6	Bsmt	Latex	20000	Bldg	Silver
7	Bsmt	Latex	20000	Bldg	Silver
22	Mez	#3 Starch Mix-Top	800	Bldg	Gray
23	Mez	#3 Starch Mix-Wire	700	Bldg	Gray
24	Mez	#3 Clay Mix-Top	1100	Bldg	Gray
25	Mez	#3 Clay Mix-Wire	1100	Bldg	Gray
26	Mez	#3 Cook Tank-Top	1100	Bldg	Gray
27	Mez	#3 Cook Tank-Top	1100	Bldg	Gray
28	Mez	#3 Stor, Tank-Top	1200	Bldg	Gray
29	Mez	#3 Stor. Tank-Top	1100	Bldg	Gray

30	Mez	#4 Starch Mix-Top	400	Bldg	Gray
31	Mez	#4 Starch Mix-Wire	400	Bldg	Gray
32	Mez	#4 Clay Mix-Top	1100	Bldg	Gray
33	Mez	#4 Clay Mix-Wire	1100	Bldg	Gray
34	Mez	#4 Cook Tank-Top	1100	Bldg	Gray
35	Mez	#4 Cook Tank-Wire	1100	Bldg	Gray
36	Mez	#4 Stor. Tank-Top	1100	Bldg	Gray
37	Mez	#4 Stor. Tank-Wire	1100	Bldg	Gray
38	Mez	#5 Starch Mix-Top	800	Bldg	Gray
39	Mez	#5 Starch Mix-Wire	800	Bldg	Gray
40	Mez	#5 Clay Mix-Top	1900	Bldg	Gray
41	Mez	#5 Clay Mix-Wire	1900	Bldg	Gray
42	Mez	#5 Cook Tank-Top	1800	Bldg	Gray
43	Mez	#5 Cook Tank-Wire	1800	Bldg	Gray
44	Mez	#5 Stor. Tank-Top	1900	Bldg	Gray
45	Mez	#5 Stor. Tank-Wire	1900	Bldg	Gray
46	Mez	#6 Starch Mix-Top	1800	Bldg	Gray
47	Mez	#6 Starch Mix-Wire	1800	Bldg	Gray
48	Mez	#6 Clay Mix-Top	4000	Bldg	Gray
FACILITY NUMBER	LOCATION	CONTENTS	SIZE (GAL)	SECONDARY CONTAINMENT	COLOR
49	Mez	#6 Clay Mix-Wire	4000	Bldg	Gray
50	Mez	#6 Cook Tank-Top	4000	Bldg	Gray
51	Mez	#6 Cook Tank-Wire	4000	Bldg	Gray
52	Mez	#6 Stor. Tank-Top	4000	Bldg	Gray
53	Mez	#6 Stor. Tank-Wire	4000	Bldg	Gray

COOPERAGE

2	Grd Flr	Latex	24000	Bldg	Off-White
3	Grd Flr	Latex	24000	Bldg	Off-White
6	Grd Flr	Ctg Plastic Pigment (Ropaque)	7850	Bldg	Brown
7	Grd Flr	City Plastic Pigment	7850	Bldg	Brown

NO. 6 PAPER MACHINE BUILDING

12	Mez	Ret. Make Down	2400	Yes	Silver
17	Opr Flr	Ret. Aid Run Tank	2400	Yes	Silver
21	Opr Flr	Dye Run Tank	750	Yes	Silver
22	Opr Flr	Dye Make Down	500	Yes	Silver
24	Grd Flr	Kerosene	92	Bldg	Yellow

G. Emissions from a laboratory, as defined in the form instructions:

G#1 Research Paper Coater – Coating could not be used for production.

H. Brazing, soldering, or welding equipment

H#1 Several maintenance welding stations located throughout the facility.

I. Individual emission units at a stationary source which each have a potential to emit for each of the following pollutants less than:

1) 4000 lbs/year of carbon monoxide

- 2) 2000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutants containing VOC), and ozone.

- I#1 Clay Unload and Convey – Clay is received wet in slurry form and contains a very small amount of VOCs.
I#2 Log Debarking – all wood is wet.
I#3 Five – 5000 cfm 400,000 Btu Modine Recirculation Units in Building No. 5 Shipping
I#4 Ten - 5000 cfm 400,000 Btu Modine Recirculation Units in Kraft Warehouse
I#5 Natural gas-fired office boiler – 1.9 mmBtu/hr

M.R. 7007.1300, subp. 4 - Insignificant Activities Required to be Listed in a Part 70 Application

Several parts washers used for maintenance activities utilizing solvent containing high flash point solvents

Several makeup air units:

- TM2 Outside - 11 MMBtu/hr
- Calcium Carbonate Bldg. – 3.5 MMBtu/hr
- Building #5 Coater + Shop – 16.85 MMBtu/hr
- Old Powerhouse – 4.3 MMBtu/hr
- Old Powerhouse – 4.3 MMBtu/hr

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 06100001-001

This Technical Support Document (TSD) is for all the interested parties of the permit. The purpose of this document is to set forth the legal and factual basis for the permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 2611/2621)
Blandin Paper Company - Member of the UPM Kymmene Group 115 1st Street Southwest Grand Rapids, Minnesota 55744 Facility Contact Phone: (218)327-6306	Blandin Paper Company - Member of the UPM Kymmene Group 115 1st Street Southwest Grand Rapids, Itasca County, Minnesota Facility Contact: Mr. Curt Firman, Manager of Environmental Affairs

1.2. Description of the facility

Blandin Paper Company (Blandin) operates a groundwood pulp and papermill in Grand Rapids, Minnesota. Blandin was initially built and began operation under the name Itasca Paper Company in 1902. In 1933 the company became Blandin Paper Company and in 1997 the plant was purchased by the UPM Kymmene Group based in Finland and the plant name was changed to Blandin Paper Company a Member of the UPM Kymmene Group. Blandin produces groundwood pulp and combines it with purchased kraft pulp to produce paper of advertising supplement, catalog, and magazine quality. Raw materials used to produce the paper include wood, clay, starch, and pigments.

The main contributing air emission sources at the plant consist of four boilers (2 natural gas-fired units and 2 wood/coal-fired units), a pressurized groundwood (PGW) mill, four paper machines, and four coater/dryers. Blandin has a potential-to-emit (PTE) of greater than 250 tons per year for all criteria pollutants except lead and thus is a major source under the federal Prevention of Significant Deterioration (PSD) program. The two wood/coal boilers are New Source Performance Standard (NSPS) units (subpart D) and the facility is a major hazardous air pollutant (HAP) source and is thus applicable to the National Emission Standards for Hazardous Air Pollutants (NESHAP) program and may be subject to a Maximum Achievable Control Technology (MACT) standard which is yet to be promulgated.

In terms of pollution control equipment, the paper machines, PGW, coater/dryers, and the natural gas-fired only boilers are all uncontrolled sources. The main power boilers (the wood/coal-fired units) are controlled by high efficiency electrostatic precipitators.

1.3 Description of any changes allowed with this permit issuance

This Title V permit is mainly a compilation of all existing rules and permit conditions. However this new operating permit eliminates a few requirements found in the previous total facility operating permit and adds several new requirements. The changes are described below.

GP 001 Paper Machines/Pressurized Groundwood Mills

The paper machines and pressurized groundwood (PGW) mills are mainly VOC sources (methanol being the main component) yet particulate matter is emitted in very small quantities. There are no federal or state VOC emission limits that apply to these sources but the standard state particulate matter limit does apply (the industrial process equipment rule). As per discussions with Ms. Shaheerah Fateen at the U.S. Environmental Protection Agency (EPA) office in Chicago, the appropriate PM periodic monitoring for these uncontrolled sources is to maintain proper maintenance of the equipment (as stated in the permit). Proper maintenance on the paper machines consist of things such as cleaning the economizer on the drying section, proper maintenance on the PGW involves cleaning the heat recovery system and proper maintenance on the coaters involves balancing the drying air with the combustion air. The permit also states that the proper O&M should be discussed in the O&M plan that is due 90 days after permit issuance. There is no known stack testing data available that can be used to estimate the PM emissions from these sources. Thus the periodic monitoring requirement of performing the proper maintenance is determined to be appropriate because 1) the processes are wet processes and inherently particulate should not be an issue 2) because these sources are mainly VOC sources and minor PM sources, and 3) there is no pollution control equipment to monitor.

The requirements for temperature monitoring, on various heat exchangers associated with these emission units, and hours of operation of these heat exchangers, are requirements carried over from Amendment No. 3 and No. 5 to the previous total facility operating permit. These requirements are Title I Conditions set to show compliance with a project that the company “netted out” of PSD for. They made some modifications to a paper machine that increased steam consumption and indirectly would have potentially required an increase in boiler steam production and inherently an increase in fuel burning and air emissions. However the project did not require permitting under the PSD major modification program. They were able to show a net decrease in boiler emissions by undertaking a mill-wide steam conservation project that allowed them to burn less fuel than before. More details on this project can be found in the technical support documents for these two previous amendments. Ultimately the plant needs to show a 34 MMBtu/hour steam conservation. If the minimum temperatures are maintained exiting the heat exchangers and the units are operated the proper number of hours during a day then compliance with the steam conservation is met. The annual energy audit is a more definitive demonstration of compliance.

With this Title V permit there has been a modification incorporated into the permit that affected the heat recovery system. In an attempt to increase pulp quality the mill is in the process of installing additional heat exchangers referred to as spiral heat exchangers (see attached memo for more details). No additional monitoring requirements are necessary for these new heat exchangers because the original four units are all that is needed to show the 34 MMBtu/hour steam conservation. The additional spiral heat exchangers just go above and beyond the necessary level.

Also, note that an error was detected in the previous amendments regarding the hours of operation limitation. The amendments listed the number of heat recovery units as 5 when in actuality there is only 4. The heat recovery units are associated with the following units: Paper Machine 6 Fresh Water Heating, Paper Machine 5 Fresh Water Heating, Paper Machine 3/4 Fresh Water Heating, and PGW Water Heating. The error was due to the fact that Paper Machines 3 and 4 have a combined heat recovery unit instead of a separate unit.

Thus a new hours of operation limit of 76 hours is listed in this Title V permit instead of the 95 hours listed in the previous permits. Per the original amendment application the typical heat savings from these units was 43 MMBtu/hr. The average was specified at 34 MMBtu/hr. The 95 hours was determined as follows:

$$34/43 = 0.791$$

$$0.791 * 24 \text{ hours/unit} = 19.0 \text{ hours per day per unit.}$$

$$19 \text{ hours per day per unit} * 5 \text{ units} = 95 \text{ hours.}$$

Since the heat recovery units have not changed, just how they are counted, (The total units will still average a reduction in boiler usage equivalent to 34 MMBtu/hr) the total hours of operations should be calculated as follows:

$$19.0 \text{ hours per day per unit} * 4 \text{ units} = 76.0 \text{ hours}$$

GP 002 Coaters/Dryers

These emission units are similar to the GP 001 sources in that they are mainly VOC sources and very minor PM sources. There are no federal or state VOC emission limits that apply to these sources but the standard state particulate matter limit does apply (the industrial process equipment rule). As per discussions with Ms. Shaheerah Fateen at the EPA office in Chicago, the appropriate PM periodic monitoring for these uncontrolled sources is to maintain proper maintenance of the equipment (as stated in the permit). The permit also states that the proper O&M should be discussed in the O&M plan that is due 90 days after permit issuance. The periodic monitoring requirement of performing the proper maintenance is determined to be appropriate because 1) the processes are wet processes and inherently particulate should not be an issue, 2) because these sources are mainly VOC sources and minor PM sources, and 3) there is no pollution control equipment to monitor.

GP 003 Main Power Boilers

Much of the requirements for these main power boilers has just been carried over from the previous operating permit. The COM/CEM and stack testing language has been edited where necessary to reflect the current rule language. This permit does contain changes to the requirements for the burning of railroad ties. There were many detailed requirements in the previous permit regarding receipt and handling of the ties. These requirements were felt to no longer be necessary. Blandin was the first facility in the state permitted to burn railroad ties and thus a very conservative approach was taken. Years of operating experience have allowed us to determine it is not necessary to have as many receipt/handling requirements.

Monitoring for PM and CO will be done by stack testing and monitoring for SO₂, NO_x, and opacity will be done by continuous emissions monitoring. Previous permits required CO continuous emissions monitoring but that has been dropped with this Title V permit. The reason for this is because the requirement was originally required because the facility wanted to burn railroad ties and CO was thought to be a good indicator of good wood combustion. Once again experience has shown that CO levels do not increase with the combustion of railroad ties but rather combustion is only improved because the moisture content of the ties is much lower than the green wood waste and thus they burn much hotter and CO emission levels are not degraded. In terms of NO_x monitoring, 40 CFR § 60.45(b)(3) states that if stack testing shows the NO_x emissions to be less than 70 percent of the standard then continuous emissions monitoring is not required. Blandin has stack tested below 70 percent of the standard and thus the monitoring is not technically required. However it has been agreed upon to continue the monitoring because it is felt there is value in the monitoring.

EU 001/EU 002 Boiler No. 3 and Boiler No. 4

These smaller natural gas-fired only boilers are not required to do any stack testing and the periodic monitoring for these units is the requirement to retain records of the type of fuel combusted in them. This periodic monitoring approach has been approved by the EPA for many other small natural gas-fired only boilers.

Table B Requirements

In addition, this Title V permit will require the facility to begin a program of self monitoring and reporting that is used in all Title V permits. These changes require semiannual reporting of deviations from the permit and an annual compliance certification. Also required are the submittal (after permit issuance) of a fugitive dust control plan, an operations and maintenance plan, and a computer dispersion modeling analysis that evaluates compliance with the National Ambient Air Quality Standards (NAAQS).

1.4 Description of previous permits issued to the facility

Permit Number and Issuance Date	Action Authorized
636-72-O-1 1972	Operating permit
636-72-O-2 1972	Operating permit
636-72-O-3 1972	Operating permit
636-77-O-1 1972	Operating permit for 4 natural gas-fired boilers
636-78-O-2 1978	Operating permit for biwind trim system
636-78-O-3 1978	Operating permit for wood chipping operation
636-78-O-4 1978	Operating permit for a starch unloading system
636-79-I-2 1979	Installation permit for boiler 5 and 6 and associated coal and wood handling systems
636-84-OT-1 1984	Total facility operating permit that included the previous 9 permits
636-91-OT-2 1991	Total facility operating permit
Amd. 1 to 636-91-OT-2	Amendment to make changes to starch and clay handling system and to make changes to boiler 5 and 6 limits and monitoring
Amd. 2 to 636-91-OT-2	Amendment to Amendment No. 1 to correct an error in the boiler 5 and 6 CO monitoring
Amd. 3 to 636-91-OT-2	Amendment to modify the No. 6 paper machine including a new gap former and steam box (PSD synthetic minor permit).
Amd. 4 to 636-91-OT-2	Administrative amendment to Amendment No. 3 to change the initial energy audit test date deadline.
Amd. 5 to 636-91-OT-2	Amendment to modify the temperature record keeping averaging time stated in Amendment No. 3

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU No.	SV No.	Emission Unit Description	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy
EU 001	001	Boiler No. 3	5.0	5.0	0.6	546	39.7	1.4	0.0
EU 002	002	Boiler No. 4	7.3	7.3	0.9	798	58.1	2.0	0.0
GP 003	003	Boiler No. 5 & Boiler No. 6	236	236	2,838	1,656	7,884	340	0.1
GP 001	006-015, 035	Paper Machines /PGW Mill	-----	-----	-----	-----	-----	72	-----
GP 002	016-034	Coater/Dryers	-----	-----	-----	-----	-----	5.3	-----

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy
Total Facility Limited Potential Emissions*	248	248	2840	3000	7982	421	0.1
Total Facility Actual Emissions (1996 emissions inventory date)	212	93	19	609	709	218	0.0

*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 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)	PM-10, TSP, SO ₂ , NO _x , CO		
NAAR (list pollutant) Not Applicable			
Part 70 Permit Program (list pollutant)	PM ₁₀ , TSP, SO ₂ , NO _x , CO		

* 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

EU, GRP, or SV No.	Applicable Regulations	Comments:
GP 001, GP 002	Minn. R. 7011.0710 Minn. R. 7011.0715	Standards of Performance for Pre (and Post)-1969 Industrial Process Equipment
GP 003	40 CFR pt. 60, subp. D	Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971
EU 001, EU 002	Minn. R. 7011.0510	Standards of Performance for Existing Indirect Heating Equipment

3. Technical Information

In addition to the permit, the following additional information is attached to or included as additional sections to the TSD:

- Emission calculation forms
- GI-07 form
- Memo from Blandin on changes to heat recovery system
- Process flow diagrams of paper machine/PGW heat recovery system

4. Conclusion

Based on the information provided by Blandin Paper Company, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 06100001-001 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Brett Ballavance, Bob Beresford, Tom Kosevich, and Dennis Becker

Attachment: Specified in section 3