

AIR EMISSION PERMIT NO. 10300036- 001

IS ISSUED TO

City of St. Peter

Broadway Generation Plant
1308 West Broadway
St. Peter, Nicollet County, MN 56082

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

Permit Type	Application Date
Total Facility Operating Permit	March 14, 2002

This permit 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 defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Part 70, Limits to avoid New Source Review

Construction and Operation Issue Date: September 9, 2002

Operating Conditions Issue Date: October 3, 2002

Expiration: October 3, 2007

Title I Conditions do not expire.

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

For Karen A. Studders
Commissioner
Minnesota Pollution Control Agency

MC:lh

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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:

This permit authorizes construction of a new facility composed of six identical model 3516B 2000 kilowatts Caterpillar diesel engine generator sets. The generators will be used for standby and peaking service. The generators are new utility units that are eligible for exemption under 40 CFR §72.7. The Permittee has applied for exemption from the Acid Rain Program according to §72.7. In addition, the facility will be a non-major source under New Source Review by limiting diesel fuel usage on a 12-month rolling sum basis. A 12,000 gallon fixed-roof indoor tank will store diesel fuel, and each engine will have a 300 gallon day tank.

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/02

Facility Name: Broadway Generation Plant

Permit Number: 10300036 - 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
OPERATIONAL REQUIREMENTS	hdr
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Operation Changes: In any shutdown, breakdown, or deviation that would cause an increase in the emission of any regulated air pollutant, 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
RECORDKEEPING	hdr
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, fuel usage records, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
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)
REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/02

Facility Name: Broadway Generation Plant

Permit Number: 10300036 - 001

<p>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.</p>	<p>Minn. R. 7019.1000, subp. 1</p>
<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: 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>	<p>Minn. R. 7019.1000, subp. 1</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>Application for Major Amendment Required: If any GP 001 NOx emission factor evaluation test measures NOx emissions greater than 9.60 g/bhp-hr, the Permittee shall submit a complete application for a major permit amendment to adjust the GP 001 fuel usage limit. The application shall be submitted within 30 days after the Permittee's receipt of the test report (from the testing company), indicating emissions greater than 9.60 g/bhp-hr. The application shall include a proposed revised fuel usage limit to restrict GP 001 NOx emissions to a maximum of 235 tons per year (12-month rolling sum basis) based on the actual value of the emission factor that was measured greater than 9.60 g/bhp-hr.</p>	<p>Minn. R. 7007.0800, subp. 2</p>
<p>Application for Permit Reissuance: due 180 days before expiration of existing permit.</p>	<p>Minn. R. 7007.0400, subp. 2</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>Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). The Report shall be submitted on a form approved by the Commissioner.</p>	<p>Minn. R. 7019.3000 through Minn. R. 7019.3010</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>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B 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 NOx performance test reports shall include NOx emissions data converted to g/bhp-hr.</p>	<p>Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

10/03/02

Facility Name: Broadway Generation Plant

Permit Number: 10300036 - 001

Subject Item: GP 001 6 Identical 2000 kW Diesel Generators

Associated Items: EU 001 Engine 1/SV 001

 EU 002 Engine 2/SV 002

 EU 003 Engine 3/SV 003

 EU 004 Engine 4/SV 004

 EU 005 Engine 5/SV 005

 EU 006 Engine 6/SV 006

What to do	Why to do it
LIMITS AND OPERATIONAL REQUIREMENTS	hdr
Fuel Usage: less than or equal to 1099823 gallons/year using 12-month Rolling Sum	Title I Condition: To restrict NOx emissions to less than major source status under 40 CFR Section 52.21
Each emission unit in GP 001 is a "new utility unit" as defined in 40 CFR Section 72.2, and is exempt from the Acid Rain Program requirements as provided by 40 CFR Section 72.7(a). Although each unit is not an affected unit (as defined in Section 72.2), each unit is subject to the requirements of Section 72.7, Section 72.8, or Section 72.14, as applicable to the exemption.	40 CFR Section 72.6(b)(9)
Generating Capacity: Each emission unit in GP 001 shall serve one or more generators with a total nameplate capacity not exceeding 25 megawatts.	40 CFR Section 72.7(a)(1)
Permitted Fuel Type: Diesel Fuel only with a maximum sulfur content of 0.05 percent by weight.	40 CFR Section 72.7(a)(2) and (3); meets requirements of Minn. R. 7011.2300, subp. 2
Opacity: less than or equal to 20 percent opacity once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Minimum Stack Height: The Permittee shall not install and vent emissions through a stack on any GP 001 emission unit that is less than 60 feet above grade.	Minn. R. 7007.0800, subp. 2
MONITORING AND RECORDKEEPING	hdr
Diesel Fuel Sulfur Content Certification: The Permittee shall obtain a certification for each diesel fuel delivery from the fuel supplier specifying the actual sulfur content in percent by weight, or guaranteeing that the sulfur content does not exceed 0.05 percent by weight.	40 CFR Section 72.7(f)
Diesel Fuel Usage Recordkeeping: by the 30th day of each month, the Permittee shall calculate and record the fuel usage for the previous month, and the diesel fuel usage for the previous 12-month period. All records shall be in the form of gallons of diesel fuel used for the time period.	Title I Condition: To restrict NOx emissions to less than major source status under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 5
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due 180 days after Permit Issuance to evaluate NOx emission factor of 9.21 g/bhp-hr. Testing shall be conducted on one engine, and all future tests shall be conducted on an emission unit that has not been tested. After all units have been tested, testing shall be conducted on the unit for which testing is least current.	Title I Condition: To restrict NOx emissions to less than major source status under 40 CFR Section 52.21; Minn. R. 7017.2020, subp. 1
Refer to Total Facility Performance Test Notifications and Submittals for additional performance testing requirements.	
Performance Test: due 180 days after Permit Issuance to measure opacity. Testing shall be conducted on one engine, and all future tests shall be conducted on an emission unit that has not been tested. After all units have been tested, testing shall be conducted on the unit for which testing is least current.	Minn. R. 7017.2020, subp. 1

TABLE B: SUBMITTALS

10/03/02

Facility Name: Broadway Generation Plant
Permit Number: 10300036 - 001

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

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

Send any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

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

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

10/03/02

Facility Name: Broadway Generation Plant

Permit Number: 10300036 - 001

What to send	When to send	Portion of Facility Affected
Computer Dispersion Modeling Information	due 1,096 days after Permit Issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests for NOx emissions. This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Total Facility
Testing Frequency Plan	due 60 days after Initial Performance Test for evaluating NOx emission factor, and measuring opacity. The plan shall specify a testing frequency for the NOx emission factor, and for opacity, based on the test data and MPCA guidance. Future NOx emission factor evaluation and opacity tests at one-year (12-month), 36-month, or 60-month intervals, or as applicable, shall be required upon written approval of the MPCA.	GP001

TABLE B: RECURRENT SUBMITTALS

10/03/02

Facility Name: Broadway Generation Plant

Permit Number: 10300036 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). The Certification shall be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 10300036-001

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

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number	Facility Address (SIC Code: 4911)
City of St. Peter 405 West St. Julien Street St. Peter, Minnesota 56082 Lewis Giesking (507) 931-0670	1308 West Broadway St. Peter Nicollet County

1.2. Description of the facility

This facility will be composed of six identical model 3516B 2000 kW Caterpillar diesel engine generators sets. The generators will be used for standby and peaking service. The generators are new utility units that are eligible for exemption under 40 CFR §72.7. The Permittee has applied for exemption from the Acid Rain Program according to §72.7. In addition, the facility will be a non-major source under New Source Review by limiting diesel fuel usage on a 12-month rolling sum basis. An indoor 12,000 gallon fixed roof tank will store diesel fuel. Each engine will have a 300 gallon day tank.

1.3 Description of any changes allowed with this permit issuance

This permit authorizes construction and operation of this new facility.

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

Permit Number and Issuance Date	Action Authorized
NA	NA

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	All HAPs tpy
Total Facility Limited Potential Emissions	2.08	2.08	4.82	235	5.98	4.15	0	0.1056

Table 2. Facility (TF) and Permit Classification

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

* 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

Subject Item	Applicable Regulations	Comments:
FC	Minn. R. 7007.0800, subp. 2	Requirement to submit major amendment application to adjust GP 001 fuel use limit if any GP 001 NO _x test shows emission rate above 9.60 g/bhp-hr
GP 001	Title I Condition: 40 CFR §52.21 40 CFR §72.7 Minn. R. 7011.2300 Minn. R. 7017.2020	Fuel usage limit, recordkeeping, and emission factor testing to avoid major source status for NO _x Acid Rain new unit exemption requirements Minnesota Standards of Performance for Stationary Internal Combustion Engines Opacity testing

3. Technical Information

Title IV/Acid Rain Program: Units are eligible for the new unit exemption in 40 CFR §72.7. The application for exemption was submitted with the title V permit application.

New Source Review: Permittee requested a fuel usage limit of 1,146,300 gallons per year which would allow emissions of 247.82 tons of NOx. However, due to possible inaccuracy of the manufacturer's NOx emission data, the fuel usage limit was scaled back so that permitted NOx emissions would be limited to 235 tons per year (and less likely to actually exceed 250 tpy).

$$235 \text{ tons NOx/yr} * 2000 \text{ lb/ton} * \text{hr}/56.58 \text{ lb NOx} * 132.4 \text{ gal/hr} = 1,099,823 \text{ gal/yr}$$

Comparison of Manufacturer's emission factors and AP-42

Pollutant	AP-42 (ch 3.4 10/96)	Manufacturer
	g/bhp-hr*	g/bhp-hr
PM	0.32	0.08
PM ₁₀	0.32	0.08
SO ₂	0.18	0.18**
NOx	10.88	9.21
CO	2.49	0.16
VOC	0.32	0.23
Pb	NA	0

Assumptions: diesel fuel with 0.05% sulfur by wt.

*Converted from lb/bhp-hr (453.4 g/lb)

**data from AP-42, not from manufacturer

Note that at 9.60 g/bhp-hr, permitted NOx would be 245 tons per year based on

$$9.21 \text{ g/bhp-hr} * 245 \text{ tpy}/235 \text{ tpy} = 9.60 \text{ g/bhp-hr}$$

The 9.60 g/bhp-hr value is the trigger used in the total facility permit requirement for submittal of a major amendment application to adjust the fuel usage limit. This trigger is not equal to the manufacturer's factor, in order to avoid unnecessary permitting activity, but this trigger still restricts NOx to less than 250 tpy.

NSPS: There is no federal new source performance standard for this source category.

Environmental Review: An EAW must be prepared prior to construction of this facility as required by Minn. R. 4410.4300 subp. 15(A).

Minn. Rules: The engines are subject to Minnesota Standards for Stationary Internal Combustion Engines. The 0.5 lb/mmBtu SO₂ limit is met by the part 72 maximum 0.05% sulfur in diesel fuel requirement. Performance testing for opacity is required.

NESHAPS: The emission units are not in a listed source category.

112g: the facility is not a major HAP source

Air Emissions Risk Assessment: CAPTAPs and SCREEN3 modeling was conducted by the permit writer to determine air toxics impacts. For CAPTAPS, all pollutants were below thresholds except acrolein. The benchmark for acrolein is 0.19 ug/cubic meter, and CAPTAPS predicted a maximum concentration of 0.52 ug/cubic meter. As a result, the permit writer conducted acrolein modeling using SCREEN3. This model predicted a worst case ambient concentration of 0.2835 E-02 ug/cubic meter.

SCREEN3 modeling conducted by the permitting consultant predicted a 24-hour NOx concentration of 887 ug/m³. Although this is less than the 938 ug/m³ target value in the EC-03 form, this target value is equal to the 24-hour significant harm level in Minn. R. 7009.1060. The reason this level was used as a target value in the EC-03 was because the EC-03 modeling exercise was designed for small short stack diesel engines, and for short stack small diesel engines, SCREEN3 over-predicts ambient concentrations. However, the engines permitted in this permit are much larger and have a significantly taller proposed stack height (45 ft). As a result, MPCA risk management staff requested that the predicted emissions meet the 24-hr NOx Alert level in Minn. R. 7009.1060 of 282 ug/m³.

MPCA permitting staff used SCREEN3 to determine that a 60 ft stack height is necessary to meet the 282 ug/m³ level. With a 60 ft stack height, SCREEN3 predicts a total facility 24-hour NOx impact of 220.7 ug/m³. MPCA Risk Managers approved the use of a 60 ft stack height to mitigate the NOx ambient air concentration issue.

Therefore, the permit requires a stack height of not less than 60 feet for each of the six engines at the proposed facility. Note that this issue was not resolved until after the 6/27/02 publishing of the public notice that indicated the public comment period would start 6/28/02. As a result, the public notice was postponed, and a notification was sent to the publishing newspaper, of such, for publication.

Comments Received During Public Notice or EPA 45-day Review: During the 30-day public comment period, a public comment was received stating that the facility was not needed and should not be constructed. A reply was sent to the commenter that this issue was outside the scope of the public notice. No comments were received from EPA during their 45-day review period.

4. Conclusion

Based on the information provided by the City of St. Peter, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 10300036-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall Cole, Jenny Reinertsen (peer review), Jalel Abdella

Attachment: Emission Calculations, SCREEN3 Dispersion Modeling, and Exemption Applications

Permit Action Number: 10300036-001
Date: 1/6/2004

