

**AIR EMISSION PERMIT NO. 15100006-003  
(ADMINISTRATIVE AMENDMENT)  
IS ISSUED TO**

**Benson Municipal Utilities**  
1414 Kansas Avenue  
Benson, Swift County, MN 56215-1718

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	05/15/2000

This permit amends Air Emissions Permit No. 15100006-002 and 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.

<b>Permit Type:</b> Federal; Part 70/Limits to Avoid NSR	<b>Amendment Type:</b> Administrative
<b>Issue Date:</b> November 17, 2000	<b>Issue Date:</b> June 18, 2001

**Expiration:** 11/17/2005

All Title I Conditions do not expire.

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Richard Sandberg, Manager  
Major Facilities Section  
Metro District

for Karen A. Studders  
Commissioner  
Minnesota Pollution Control Agency

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**NOTICE TO THE PERMITTEE:**

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. 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:**

Benson Municipal Utilities provides electrical service to the City of Benson, Minnesota and under contract to Missouri River Energy Services. All generation is from reciprocating diesel engine generators.

The original permit authorized the continued operation of two engine generators at the facility, and authorized the construction of five new engine generators. The permit set limits on annual NOx emissions that restrict all potential emissions to less than major source levels as defined by 40 CFR § 52.21.

**AMENDMENT DESCRIPTION:**

This permit amendment is an MPCA initiated administrative amendment. It implements the current MPCA air dispersion modeling policy and imposes additional requirements on the Permittee.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

**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
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
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
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Application for Permit Reissuance: due 180 days before expiration of existing permit.	Minn. R. 7007.0400, subp. 3
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

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)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
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
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
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)
Emission Inventory Report: due 91 days after end of each calendar year (April 1) following 11/17/00. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emissions Fees: Due within 60 days of receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

**Subject Item: GP 001 Engines 5 through 11**

- Associated Items:** EU 001 Engine 5  
 EU 002 Engine 6  
 EU 003 Engine 7  
 EU 004 Engine 8  
 EU 005 Engine 9  
 EU 006 Engine 10  
 EU 007 Engine 11

What to do	Why to do it
EMISSION LIMITS	hdr
Nitrogen Oxides: less than or equal to 249 tons/year based on a 12 month rolling sum.	Title I Condition: to limit potential emissions to less than major source levels as defined by 40 CFR 52.21
Opacity: less than or equal to 20 percent once operating temperatures have been attained.	Minn. R. 7011.2300, Subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300, Subp. 2
OPERATING REQUIREMENTS	hdr
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight each shipment.	Minn. R. 7007.0800, Subp. 2
Sulfur Content of Fuel: less than or equal to 0.05 percent by weight on an annual average.	40 CFR 72.7, New Units Exemption, and Minn. R. 7007.0800, Subp. 2
MONITORING REQUIREMENTS	hdr
Each month, calculate the 12 month rolling sum of NOx emissions for the previous 12 months. The annual NOx emissions shall be calculated using the operating limitations worksheet in Appendix A of this permit.	Title I Condition: Monitoring to demonstrate compliance with limits taken to restrict potential emissions to less than major source levels as defined by 40 CFR 52.21
For each delivery of fuel the following records shall be kept; the type of fuel, the sulfur content, and the sulfur content of each sample taken. These records shall be kept for a minimum of 5 years.	40 CFR 72.7 (f) and Minn. R. 7007.0800, Subp. 4

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

**Subject Item: TK 001 #2 Fuel Oil**

<b>What to do</b>	<b>Why to do it</b>
Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.	40 CFR 60.116b(b)



**TABLE B: SUBMITTALS**

06/18/01

Facility Name: Benson Municipal Utilities  
Permit Number: 15100006 - 003

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**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

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). 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
Submittal	due before 12/31/2000. Submittal is of the statement required by 40 CFR 72.7(b)(2), identifying the units exempt from Part 72 (engines 7 - 11), giving nameplate capacity of each generator served by each unit, fuels burned and their sulfur content by weight, and a statement that the owners will comply with paragraph (f) of 72.7. Submittal shall be made both to the MPCA and to the U.S. EPA regional office in Chicago. 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.	GP001

**TABLE B: RECURRENT SUBMITTALS**

06/18/01

Facility Name: Benson Municipal Utilities

Permit Number: 15100006 - 003

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 11/17/2000. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Compliance Certification	due 30 days after end of each calendar year starting 11/17/2000 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604.	Total Facility

APPENDIX MATERIAL

Facility Name: Benson Municipal Utilities

Permit Number: 15100006-003

**OPERATING LIMITATIONS WORKSHEET**

<b>Emission Unit</b>	<b>Description</b>	<b>Fuel</b>	<b>Rolling 12 month Sum (Gallons)</b>	<b>NOx * Emission Factor (lb/gal)</b>	<b>Rolling 12 month sum (lb/year)</b>
Engine 5	Worthington 925 kW	Diesel	_____ x	0.44 =	_____
Engine 6	Enterprise 1275 kW	Diesel	_____ x	0.44 =	_____
Engine 7	Caterpillar 1825 kW	Diesel	_____ x	0.49 =	_____
Engine 8	Caterpillar 1825 kW	Diesel	_____ x	0.49 =	_____
Engine 9	Caterpillar 1825 kW	Diesel	_____ x	0.49 =	_____
Engine 10	Caterpillar 1825 kW	Diesel	_____ x	0.49 =	_____
Engine 11	Caterpillar 1825 kW	Diesel	_____ x	0.49 =	_____
				<b>TOTAL</b>	_____

NOTE Total must be less than 498,000 lb. (249 tons)

\* Emission factor source for Engines 5 and 6 is AP42. The emission factor source for Engines 7 through 11 is the manufacturer.

**INSIGNIFICANT ACTIVITIES REQUIRED TO BE LISTED:**

One jacket water boiler, 300,000 Btu/hr, installed in 1999.

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**Benson Municipal Utilities**  
**AIR EMISSION PERMIT NO. 15100006-003**

This technical support document 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: 4911)
Benson City Council 1410 Kansas Avenue Benson, MN 56215  Robert Flaws Director of Public Works (320)843-4775	1414 Kansas Ave Benson, MN

1.2. Description Of The Facility

Benson Municipal Utilities provides electrical service to the City of Benson, MN and under contract to Missouri River Energy Services. Through the generation of electricity by diesel engines, PM/PM10, SO<sub>x</sub>, NO<sub>x</sub>, VOC and CO are released to the atmosphere.

A Part 70 permit was issued in November 2000 that allowed the facility to install 5 new engine/generators. The permit contained limits on annual emissions that prevent potential emissions from the source from exceeding major source levels as defined by 40 CFR § 52.21.

1.3 Description of the Activities Allowed By This Permit Action

This permit amendment is an MPCA initiated administrative amendment. It implements the 2001 MPCA air dispersion modeling policy and imposes additional requirements on the Permittee. This qualifies as an Administrative Amendment under Minn. R. 7007.1400, subp. 1(C).

1.4. Facility Emissions

There are no changes in emissions associated with this permit amendment.

## **2. Conclusion**

The MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 15100006-003 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Permit Engineer: Peggy L. Bartz  
Attachment: CD-01 Forms