

Application Completeness Review

From: Bouchareb, Hassan (MPCA)
Sent: Thursday, September 01, 2016 2:53 PM
To: Kevin Pylka (kpylka@polymetmining.com)
Cc: Todd Fasking (tfasking@barr.com); Pat Sheehy (psheehy@barr.com); Foss, Ann (MPCA); Baumann, Suzanne (MPCA); Sommer, Steve (MPCA)
Subject: Individual Operating Permit Application Completeness - August 24, 2016
Attachments: TFP Application Review Checklist DQ5639.pdf

Mr. Kevin Pylka
Manager Environmental Permitting & Compliance
Poly Met Mining, Inc.
6500 County Road 666, P.O. Box 475
Hoyt Lakes, MN 55750

Dear Mr. Pylka:

Your Application has been determined to be complete enough for processing. The MPCA may still have additional questions to clarify information contained in the application.

- Permittee: Poly Met Mining, Inc.
- Preferred ID #: 13700345
- Agency Interest ID #: 213111
- Title of application: Individual Part 70 Operating Permit
- Date received: August 24, 2016

I am enclosing the MPCA's completeness review checklist for your information. You will note that while the application is substantially complete, several items were completed incorrectly as described on the attached document; however, you do not need to submit any revised or corrected information at this time.

The initial completeness review does not determine whether or not your application is technically complete for the purpose of taking final action on your application; therefore, you may need to submit other required information as identified during the process of preparing your permit. This letter is not an approval to construct, modify, or operate a facility which emits air pollution.

If you need application forms, you can find the forms on the MPCA website at <https://www.pca.state.mn.us/air/air-quality-forms-permit-application-notifications-compliance-and-miscellaneous>. For paper copies or assistance in filling out the forms, contact the MPCA at 651-282-6143 or 1-800-657-3938.

If you have any questions regarding the completeness review, you may contact me at 651-757-2653.

Sincerely,

Hassan M. Bouchareb | Engineer
Air Quality Permits Section
Minnesota Pollution Control Agency (MPCA)
520 Lafayette Road | St. Paul, MN | 55155
Office: (651) 757-2653 | Fax: (651) 296-8717

Enclosures



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

TFP Application Review

Completeness Checklist
Air Quality Permit Program

Doc Type: Permitting Checklist

Facility name: Poly Met Mining, Inc. Tracking number: 5639
AQ Facility ID number: 13700345 Agency Interest ID number: 213111 Date received
(mm/dd/yyyy): 8/24/2016
Date review completed (mm/dd/yyyy): 9/1/2016 Reviewer's initials: HBouchareb

Tier I Review

The Permit Document Coordinator will return a permit application if missing any of the following:

- Form SCP-01 or signature
- Check for appropriate fee

Tier II Review

Return an application after the Tier II Review if any of the following are true:

- Any of the boxes under the "Incomplete" columns (columns A3-A5) of Table A were checked, indicating that an always-required form was not submitted, the form was not the most current at the time of application, or the form was modified by changing or eliminating questions.
- The application is incomplete per the criteria listed at the end of the Tier II section.

Table A

A1 Form/ Requirement	A2 Submitted?	Incomplete		A5 If checked "no" in column A2 – Is the form or information required?
		A3 Submitted?	A4 Submitted but did not use the most current ¹ version or was modified by changing or eliminating questions	
SCP-01	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
CH-00	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-01	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
IA-01	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-15	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
MI-01	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-01	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-02	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-03	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
CK-01	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-04	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-05A	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
HE-01	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CR-02	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-05B	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-05C	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-05D	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-05F	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-07 or GI-07 Spreadsheet	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
Printed copy of calculations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	NA	NA
HG-01	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-10	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-09	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-09A	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
Highlighted copy of applicable Part 63 NESHAP(s)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-09B	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
Highlighted copy of applicable Part 61 NESHAP(s)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-09C	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
CH-04c	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-04a	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-04b	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-04d	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CH-04e	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
BACT analysis	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-09D	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
Highlighted copy of applicable NSPS	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	NA	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete

A1 Form/ Requirement	A2 Submitted?	Incomplete		A5 If checked "no" in column A2 – Is the form or information required?
		A3 Submitted?	A4 Submitted but did not use the most current ¹ version or was modified by changing or eliminating questions	
GI-09F	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
GI-09H	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CAM Plan	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
GI-09I	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
CD-01	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/>	NA
CD-02	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CD-03	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
CD-05	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
ME-01	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
ME-02	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
WC-01	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
PAL-01	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
PAL-02	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete
MI-02C	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/>	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete

Was modeling submitted?	<input type="checkbox"/> No → Was the "required" box checked on Form CK-01? <input checked="" type="checkbox"/> Yes → If a modeling report was submitted with the application, send an email to Ruth Roberson at ruth.roberson@state.mn.us stating a modeling report was received with the application for the facility. Per review by MPCA modeling staff, was the protocol deemed adequate?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No. Application is incomplete
Was an AERA submitted?	<input type="checkbox"/> No → Was the "required" box checked on Form CK-01? <input checked="" type="checkbox"/> Yes → If a completed AERA was submitted with the application, send an email to Ruth Roberson at ruth.roberson@state.mn.us stating an AERA report was received with the application for the facility. Per review by MPCA risk assessment staff, was the protocol deemed adequate?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Application is incomplete <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No. Application is incomplete

¹ If the date on the form used is earlier than the date on the most current form, check the content of the form used. If it is incorrect or leads to wrong conclusion, check the box. If the content of the form used is equivalent to the content of the most current form, or at a minimum allows a correct conclusion to be reached, do not check the box. If you are unsure, check with a supervisor or coordinator.

Ranking system used to rate quality of submittal

1 = lacking all information

3 = submitted all information

2 = lacking some information

NA = Not applicable

If four (4) or more items are rated "1" or five (5) or more items are rated "2," or a total of six (6) or more items are rated either "1" or "2," then the application will be deemed incomplete and be returned to the applicant.

Note to reviewer: Pay attention to whether instructions were followed pertaining to order of questions. On some forms, depending on the answers given, the user is directed to a question that may not be the next question sequentially. If the instructions for which question to go to next are not followed, it can lead to a situation where the form is lacking some or all required information.

SCP-01 Submittal cover page	1	2	3	NA
· In "Submittal Certification," is the box checked indicating that construction other than what is allowed under Minnesota Rules has started? ("1" for yes, "3" for no)	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
- If yes, check with the Construction Supervisor before proceeding. Has the Construction Supervisor approved this application for completeness review? ("1" for no, "3" for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reviewer's comments:				

Confidential information request	<input checked="" type="checkbox"/> NA – confidentiality not requested			1	2	3	
· Is information on the public version properly blocked out, i.e. only the specific information which is being requested to be confidential?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
· Is a confidential copy enclosed which has all the data available?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Reviewer's comments:							

General information forms	1	2	3	NA
· GI-02 – Does process flow diagram seem to match information provided in GI forms and as described elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
· GI-03 – Are the facility's stacks/vents included?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
· GI-04 – Is it completely filled in; are the SVs/STRUs numbered sequentially?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
· GI-05A				<input type="checkbox"/>
- Is it completely filled in; are the CEs/TREAs numbered sequentially?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- Do control efficiencies look reasonable?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
· GI-05B - Is it completely filled in; are the EUs/EQUIs numbered sequentially?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
· GI-05C – Is it completely filled in; are the TKs/EQUIs numbered sequentially?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
· GI-05D – Is it completely filled in; are the FSs/FUGIs numbered sequentially?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
· GI-05F				<input type="checkbox"/>
- Are all EUs/EQUIs, TKs/EQUIs, and FSs/FUGIs listed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- Are all active SVs/STRUs and CEs/TREAs accounted for?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
· GI-07 – Is it completely filled in; or is the equivalent information submitted using the GI-07 Spreadsheet?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
- If they indicated that a CD with calculations is included, is it? ("1" for no, "3" for yes)	<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
Reviewer's comments:	<i>Regarding Form GI-03 and the attached Stack/Vent Diagram, not all stacks listed on the form are shown on the diagram and there are a few stacks shown on the diagram that are not listed on the form. The stacks not shown on the diagram are SVs 014-015, 018, 036, 038, 041-042, 045-048, 050-051, 053, 058-059, 062, 068-079, 081-085. The stacks shown on the diagram but not shown on the form are identified as SVs 326, 337, 425, and WWTFBV.</i>			

General information forms

1 | 2 | 3 | NA

Regarding Form GI-04, the stacks identified as building vents are missing several parameters. These vents should have estimates for temperature and total air flow rate as indicated in the instructions for Question 3a. For these building vents, please also provide an estimate of the height and exit width/length/diameter. These values can be the average building vent dimensions and the air flow rate should be the total rate from all building vents if the Stack/Vent ID is intended to represent all building vents.

Regarding Form GI-05A, please note that within the application, specifically on the process flow diagrams, there are locations where control equipment are labeled as cartridge filters vs. baghouses. Most of the control equipment identified on the form are labeled as fabric filters and it should be confirmed whether or not the cartridge filters function the same as or differently than a typical baghouse. Please also note that this did not affect the outcome of the completeness review.

Regarding Form GI-05B, the emission units listed on the form are missing material identifiers for maximum design capacity. In addition, for those emission units that use fuel and have a material process throughput, each unit should have a maximum design capacity for each. In the example of an emergency generator there should be a value for the maximum fuel consumption and maximum energy production (60 gallons diesel per hour and 1000kW). Please also note that it is not acceptable to combine emission sources when there are distinct units. As discussed in pre-application meetings the example was space heaters included for building heat. Each space heater should have a distinct ID and individual capacities identified.

Regarding Form GI-05F, there may be a need to examine the relationships shown on this form in greater detail. Specifically, the emission units listed as being controlled by several control devices and then by several more in series (i.e. EU 023). If this emission unit is supposed to be multiple emission points that are each individually controlled, they should be split into their own individual ID numbers. Please note that this did not affect the outcome of the completeness review.

GI-09A Requirements: NESHAP (40 CFR pt. 63) <input type="checkbox"/> Not included in application		1	2	3	NA
• Do answers to questions (A2 or B2 or C2) and (A3 or B3 or C3) match the emissions summary (check calculations, GI-07 or GI-07 Spreadsheet)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• If answer to A4 or B4 or C6 is Yes, are appropriate limitations proposed in CD-01?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• If answer to A6 or B6 is Yes or the answer to C6 is No, is a case-by-case Maximum Achievable Control Technology (MACT) determination provided and are appropriate conditions proposed in CD-01?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Do answers on GI-09A match answers for question 1 on GI-09?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• Does it seem likely that emission units listed on GI-05B are subject to a Part 63 NESHAP and are not identified as such on this form? ("3" for no, "1" for yes)		<input type="checkbox"/>		<input checked="" type="checkbox"/>	
Reviewer's comments:	Please note that while it can be seen in the bookmark titles for the attached copies of the applicable requirements of 40 CFR pt. 63, it would be helpful to identify the emission sources to which the highlighted copies apply on the actual document as otherwise it is not shown.				

GI-09B Requirements: NESHAP (40 CFR pt. 61) <input type="checkbox"/> Not included in application		1	2	3	NA
• Do answers on GI-09B match answers for question 2 on GI-09?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Reviewer's comments:					

GI-09C Requirements: New Source Review <input type="checkbox"/> Not included in application		1	2	3	NA
New facility (completed Section B)					<input type="checkbox"/>
• Do numbers in question B1 match emission summary calculations (check calculations, GI-07 or GI-07 Spreadsheet)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• Was B6 completed if necessary? ("1" for no, "3" for yes)		<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
• If answer to B7 is "yes" is B8 completed? ("1" for no, "3" for yes)		<input type="checkbox"/>		<input checked="" type="checkbox"/>	<input type="checkbox"/>
• If answer to B7 is "no" is B9 completed? ("1" for no, "3" for yes)		<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>

GI-09C Requirements: New Source Review <input type="checkbox"/> Not included in application	1	2	3	NA
• If answer to B10 is “yes” is B11 completed? (“1” for no, “3” for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
• If answer to B10 is “no” is B12 completed and CH-04e and a BACT analysis included? (“1” for no, “3” for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input checked="" type="checkbox"/>
• If BACT is included for pollutants other than Volatile Organic Compounds (VOCs), are modeling results provided?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Existing facility complying with current registration/Capped/General permit (completed Section C)				<input checked="" type="checkbox"/>
• If answer to question C1 is “yes”, do numbers in question C2 match emission summary calculations (check calculations, GI-07 or GI-07 Spreadsheet)? (“1” for no, “3” for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If answer to question C1 is “yes”, is CH-04c included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If answer to question C6 is “no”, and the answer to C4 or C5 is “yes,” is CH-04a included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If answer to question C6 is “no”, and the answer to C4 or C5 is “no,” is CH-04b included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If BACT is included for pollutants other than Volatile Organic Compounds (VOCs), are modeling results provided?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Existing unpermitted facility (or holding but not complying with a Registration/Capped/General Permit (completed Section D)				<input checked="" type="checkbox"/>
• Do numbers in question D1 match emission summary calculations (check calculations, GI-07 or GI-07 Spreadsheet)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• If the answer to question D2 is “yes” is CH-04c included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If the answer to question D5 or D6 is “yes” is CH-04a included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
• If the answer to question D5 or D6 is “no” is CH-04b included? (“1” for no, “3” for yes; completeness is determined below)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's comments:				

CH-04c determination of greenhouse gas status <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
• Tables 2 & 3 - Are questions 6 and 7 answered properly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Table 4 <input type="checkbox"/> Not completed because of answers to #6 or #7				
– If Replacement box is checked, is enough information provided to determine if the emission unit qualifies as replacement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– If projected actual data used, is supporting documentation provided?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– If exclusions used, is description present and adequate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– Are baseline dates provided?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Tables 5 – 7 <input type="checkbox"/> Not completed because of answers to #6 or #7				
– Do numbers in Table 5 match those in Table 4?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
– Do results in Table 6 match calculations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– Do totals in Table 7, Column D make sense?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
– Check totals in Table 7 – Are they under threshold when correct significant digits used (e.g. 39.7 is really 40 if comparing to Prevention of Significant Deterioration [PSD] significant emission rate threshold for nitrogen oxides)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reviewer's comments:				

CH-04a Determination of increases at major sources <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
• Table 1				
– If Replacement box is checked, is enough information provided (e.g., comprehensive description of existing and replacement units, calculations, emission factors, factor source(s), and any assumptions) to determine if the emission unit qualifies as replacement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
– If projected actual data used, is supporting documentation provided (calculations, emission factors, factor source(s), and any assumptions)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

CH-04a Determination of increases at major sources <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
- If exclusions used, is description present and adequate (justification of "operations that could have been accommodated," calculations, emission factors, factor source(s), and any assumptions)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Are baseline dates provided?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Tables 2 – 4				
- Do numbers in Table 2 match those in Table 1?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- Do results in Table 3 match calculations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- Do totals in Table 4, Column D make sense?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- Check totals in Table 4 – Are they under threshold when correct significant digits used (e.g. 39.7 is really 40 if comparing to Prevention of Significant Deterioration [PSD] significant emission rate threshold for nitrogen oxides)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
- If any Total Increase (Column D) is greater than any thresholds in Column E, is Table 5 completed? ("1" for no, "3" for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
- If Table 5 was completed, and they answered "yes" for any pollutant, is Item 7c completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
- If Table 5 was completed, and they answered "no" is CH-04d attached? ("1" for no, "3" for yes)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's comments:				

CH-04b Determination of increases at minor sources <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
• Do numbers in Table 1 match calculation spreadsheets?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Check totals in Table 2 and answer to question #5 – If any are at or over the threshold when correct significant digits used (e.g. 249.8 is really 250 if comparing to PSD threshold), is Table 3 filled out?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• If Table 3 is completed, and if they answered "yes" for #7, is #8 completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• If Table 3 is completed, and if they answered "no" for #7, is #10 and Table 4 completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• If Table 4 is completed, and if they answered "yes" for #11, is #12 completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• If Table 4 is completed, and if they answered "no" for #11, is #13 and Table 5 completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• If Table 5 is completed, is CH-04e included?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's comments:				

CH-04d Calculating the net emissions increase <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
• Table 1 Creditable Contemporaneous Decreases – if claimed, is all information filled in?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Table 2 Creditable Contemporaneous Increases – If claimed, is all information filled in?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Table 3 Net Emissions Increase – is the table completely filled out, using all increases and decreases from Tables 1 and 2?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Table 3 - if any net increase (column e) exceeds the threshold (column f), is Table 4 filled out?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Table 4 - if answered "yes" for any pollutant, is #8 completed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Table 4 - if answered "no" for any pollutant, is CH-04e included?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reviewer's comments:				

CH-04e Required elements of a PSD application <input checked="" type="checkbox"/> Not included in application	1	2	3	NA
• Table 1 – Does it seem reasonable (included all pollutants for which a BACT analysis would be required)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Table 2 – Does it seem reasonable (includes modeling for all pollutants that would require it)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reviewer's comments:				

GI-09D Requirements: NSPS <input type="checkbox"/> Not included in application	1	2	3	NA
• Does it seem likely that emission units listed on GI-05B are subject to an NSPS and are not identified as such on this form? ("3" for no, "1" for yes)	<input type="checkbox"/>		<input checked="" type="checkbox"/>	

GI-09D Requirements: NSPS		<input type="checkbox"/> Not included in application	1	2	3	NA
Reviewer's comments:	<i>Please note that while it can be seen in the bookmark titles for the attached copies of the applicable requirements of 40 CFR pt. 60, it would be helpful to identify the emission sources to which the highlighted copies apply on the actual document as otherwise it is not shown.</i>					

GI-09H Requirements: CAM		<input type="checkbox"/> Not included in application	1	2	3	NA
·	Are questions 1 and 2 answered correctly (check calculations, GI-05B, GI-07 or GI-07 Spreadsheet)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	If subject to CAM, do they claim exemptions? Is there sufficient information provided in Table B?		<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
·	If no exemptions apply, is sufficient information provided in Table A?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
·	Is CAM plan provided? Compare contents of plan with list on form to see if sufficient information is provided.		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Reviewer's comments:	<i>Regarding Form GI-09H, for emission units that are labeled as not "Large PSEUs" but would be subject to CAM at reissuance it should be confirmed which pollutants from each emission unit matter for CAM. In example, an emission unit could be a Large PSEU for PM but an Other PSEU for PM10.</i>					

GI-09I Requirements: State rules		<input type="checkbox"/> Not included in application	1	2	3	NA
·	Are there calculations to demonstrate whether the emission unit will be in compliance with the applicable state rule (particularly for Industrial Process Equipment Rules [IPER]) (check calculations, GI-07 or GI-07 Spreadsheet)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Reviewer's comments:						

ME-01 Continuous monitoring system information		<input checked="" type="checkbox"/> Not included in application	1	2	3	NA
·	Check GI-09A and GI-09D forms (and highlighted rules, if attached) to see if any applicable MACT or NSPS require continuous monitoring. Also check GI-09E and GI-09J; if facility is subject to Acid Rain or CAIR, continuous monitoring is most likely required. If continuous monitoring is required from one of these rules, or will be used for some other reason (check CD-01), has this form been filled out completely?		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
·	Is form ME-02 included (required when ME-01 is included) and is it filled out completely ("1" for no, "3" for yes)?		<input type="checkbox"/>		<input type="checkbox"/>	
Reviewer's comments:						

HG-01 Mercury releases to ambient air		<input type="checkbox"/> Not included in application	1	2	3	NA
<i>Note: This form is needed for new or expanded facility, or changed or modified operation for the following types of facilities/emission units: taconite production, secondary metal processors, the combustion of fuels in electricity generating stations and industrial boilers (except when burning only natural gas), and sewage sludge/garbage/municipal incineration.</i>						
·	Are there numbers in the table for Question 3?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	Are Questions 4a and 4b answered?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	Is the diagram for Question 5 attached?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Reviewer's comments:						

Calculations		<input type="checkbox"/> Not included in application	1	2	3	NA
·	Do they look complete; are all affected units included?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	Do they look complete; are there numbers for lb/hr, uncontrolled and controlled tons per year?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	Do they look complete; did they show the work (example calculations, or unlocked spreadsheet)?		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
·	Were assumptions/emission factors documented? Were they specific for each factor		<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Calculations	<input type="checkbox"/> Not included in application	1	2	3	NA
(e.g., AP-42, chapter and table # references)?					
• If emission factor is not from AP-42 or something standard, is there justification for use of this factor? Did they justify use of the factor, if it is not an exact match to the operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If they used control efficiency, does the number match value entered on Form GI-05A?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
• Are calculations provided for Total Hazardous Air Pollutants (HAPs) and Single HAPs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
• If calculations are required to support the information provided in form CH-04c, are they provided? Are they complete?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Reviewer's comments:					

CD-01 Compliance plan	<input type="checkbox"/> Not included in application	1	2	3	NA
• Does it look complete; are all affected units included?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
• If question 4a is Yes, is a highlighted copy of the Part 63 NESHAP subpart and Subpart A attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 4b is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 5a is Yes, is a highlighted copy of the Part 61 NESHAP attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 6a is Yes, is a highlighted copy of the NSPS subpart and Subpart A attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 7a is Yes, are forms attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• If question 8a is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 8c is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• If question 9a is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 10a is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 11a is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• If question 11b is Yes, is proposed compliance demonstration detailed enough?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
• If question 12 is Yes, is Form CD-05 attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Reviewer's comments:					

CD-03 Compliance schedule	<input checked="" type="checkbox"/> NA - Not included in application	1	2	3	NA
• Is the table in Item 3 completed for all items identified on CD-02 as being out of compliance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Are the proposed corrective actions specific ("1" for no, "3" for yes)?	<input type="checkbox"/>		<input type="checkbox"/>		
• Are the proposed progress measurements specific and reasonable ("1" for no, "3" for yes)?	<input type="checkbox"/>		<input type="checkbox"/>		
Reviewer's Comments:					

CD-05 Compliance plan for control equipment	<input type="checkbox"/> Not included in application	1	2	3	NA
• Is all control equipment listed on GI-05A included in CD-05?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
• If capture efficiency is <100%, and if the capture efficiency is greater than 80%, is there justification provided with this form?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
• Are parameters listed for each CE/TREA?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
• If any CE/TREA is marked as subject to CAM, is CAM plan attached?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Reviewer's Comments: *Regarding Form CD-05, the operating parameter values should be estimated based on manufacturer guidelines and intended operation and maintenance. These values are important in particular as they inform the proper operation of the control equipment and support the intended control efficiencies.*

WC-01 Waste combustors needing permits	<input checked="" type="checkbox"/> NA - Not included in application	1	2	3	NA
<i>If any waste combustor is receiving its first permit or reissuance, then this form must be used. Check N/A above if not a waste combustor and skip remaining questions in section.</i>					
• Is Section 3 filled out?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

WC-01 Waste combustors needing permits

NA - Not included in application

	1	2	3	NA
• Are appropriate items identified as required on GI-03?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• Does GI-02 show where ash will be stored, as well as other items required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
• If reissuance, are performance test results reported as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
• Are plans submitted for:				
– Industrial solid waste management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
– How to deal with solid wastes that contain mercury?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
– Dealing with toxics if waste combustor will combust municipal solid waste or Refuse Derived Fuel (RDF)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
– Ash management?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Reviewer's comments:				

Tier II Completeness review results

1 2 1s + 2s

Count Total Number of: 1 4 5

- Complete (Does not necessarily mean that the application is complete for the purpose of taking final action)
- Incomplete (total number of 1s is ≥ 4 , or total number of 2s is ≥ 5 , or total number of 1s plus total number of 2s is ≥ 6 ; or application is incomplete as documented in Table A). Missing, incorrect, or incomplete items are required elements of a permit application per Minn. R. 7007.0500 or 7007.0501.

Reviewer's comments: *Regarding Form IA-01, please note that emission sources that would be included in the permit as insignificant activities are typically not assigned ID numbers (i.e. EQUI 1, EQUI 2, etc..) unless there is another reason to identify the emission source. One example reason is the emission source is subject to a federal performance standard. Additionally, there was an activity identified under Minn. R. 7008.4110 that was labeled as potentially present at the facility. This activity's existence should be confirmed and a decision of whether or not it would take place at the facility identified.*

Regarding Form GI-03 and the attached Stack/Vent Diagram, not all stacks listed on the form are shown on the diagram and there are a few stacks shown on the diagram that are not listed on the form. The stacks not shown on the diagram are SVs 014-015, 018, 036, 038, 041-042, 045-048, 050-051, 053, 058-059, 062, 068-079, 081-085. The stacks shown on the diagram but not shown on the form are identified as SVs 326, 337, 425, and WWTFBV.

Regarding Form GI-04, the stacks identified as building vents are missing several parameters. These vents should have estimates for temperature and total air flow rate as indicated in the instructions for Question 3a. For these building vents, please also provide an estimate of the height and exit width/length/diameter. These values can be the average building vent dimensions and the air flow rate should be the total rate from all building vents if the Stack/Vent ID is intended to represent all building vents.

Regarding Form GI-05A, please note that within the application, specifically on the process flow diagrams, there are locations where control equipment are labeled as cartridge filters vs. baghouses. Most of the control equipment identified on the form are labeled as fabric filters and it should be confirmed whether or not the cartridge filters function the same as or differently than a typical baghouse. Please also note that this did not affect the outcome of the completeness review.

Regarding Form GI-05B, the emission units listed on the form are missing material identifiers for maximum design capacity. In addition, for those emission units that use fuel and have a material process throughput, each unit should have a maximum design capacity for each. In the example of an emergency generator there should be a value for the maximum fuel consumption and maximum energy production (60 gallons diesel per hour and 1000kW). Please also note that it is not acceptable to combine emission sources when there are distinct units. As discussed in pre-application meetings the example was space heaters included for building heat. Each space heater should have a distinct ID and individual capacities identified.

Regarding Form GI-05F, there may be a need to examine the relationships shown on this form in greater detail. Specifically, the emission units listed as being controlled by several control devices and then by several more in series (i.e. EU 023). If this emission unit is supposed to be multiple emission points that are each individually controlled, they should be split into their own individual ID numbers. Please note that this did not affect the outcome of the completeness review.

Please note that while it can be seen in the bookmark titles for the attached copies of the applicable requirements of 40 CFR pt. 63, it would be helpful to identify the emission sources to

which the highlighted copies apply on the actual document as otherwise it is not shown.

Please note that while it can be seen in the bookmark titles for the attached copies of the applicable requirements of 40 CFR pt. 60, it would be helpful to identify the emission sources to which the highlighted copies apply on the actual document as otherwise it is not shown.

Regarding Form GI-09H, for emission units that are labeled as not "Large PSEUs" but would be subject to CAM at reissuance it should be confirmed which pollutants from each emission unit matter for CAM. In example, an emission unit could be a Large PSEU for PM but an Other PSEU for PM10.

Regarding Form CD-05, the operating parameter values should be estimated based on manufacturer guidelines and intended operation and maintenance. These values are important in particular as they inform the proper operation of the control equipment and support the intended control efficiencies.