

## General information

**Public comment period begins:** March 26, 2021

**Public comment period ends:** April 26, 2021 (4:30 p.m.)

**Name and address of Permittee:**

Saint Paul Regional Water Services;  
 City of Saint Paul  
 1900 Rice St  
 Saint Paul, MN 55113-6810

**Facility name and location:**

Saint Paul Regional Water Services  
 McCarron WTP  
 1900 Rice St  
 Saint Paul, MN 55113-6810  
 Ramsey County

**MPCA contact person:**

Benton Campbell  
 Industrial Division  
 Minnesota Pollution Control Agency  
 520 Lafayette Rd  
 Saint Paul MN 55155  
 Phone: 651-757-2285  
 Email: Benton.Campbell@state.mn.us

File manager phone: 651-757-2728 or  
 1-844-828-0942

A draft permit and supporting documentation are available for review on the MPCA Public Notices webpage at <http://www.pca.state.mn.us/publicnotices>. Additional materials relating to the issuance of this permit are available for inspection. Please call the listed MPCA contact person between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday to arrange for this. The MPCA will mail or email a copy of the draft permit upon request. Comments, petitions, and other requests must be received at the MPCA in writing on or before the public comment period end date and time identified above.

## Description of permitted facility

The City of Saint Paul (Permittee) owns and Saint Paul Regional Water Services operates the Saint Paul Regional Water Services McCarron Water Treatment Plant for the City of Saint Paul and surrounding communities. The facility is composed of lime handling for water treatment equipment controlled by fabric filters, four natural gas-fired boilers, two 2520 horsepower (hp) diesel fuel-fired reciprocating internal combustion engines (RICE), and multiple insignificant activities (27 indirect-fired heating units and a gasoline storage tank). Lime handling equipment emits particulate matter (PM), particulate matter less than 10 microns (PM<sub>10</sub>), and particulate matter less than 2.5 microns (PM<sub>2.5</sub>). The four natural gas-fired boilers emit carbon dioxide (CO<sub>2</sub>), carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>) and other emissions from the combustion of natural gas. The two RICE are on standby unless a control period is declared by Xcel Energy, the local electric transmission and distribution utility. A control period is declared when demand on the electric grid exceeds standard capacity. The RICE emit mainly CO<sub>2</sub>, CO, and NO<sub>x</sub>, as well as smaller quantities of other pollutants, and each RICE is equipped with an oxidation catalyst to reduce CO emissions by converting it to CO<sub>2</sub>.

The facility has taken permit limits on annual hours of operation, which restrict NO<sub>x</sub> emissions below major source thresholds under both the Part 70 and New Source Review (NSR) programs. These operating hours limits, as well as the oxidation catalysts, limit CO to remain a minor source under Part 70. The facility is an area source under the National Emission Standards for Hazardous Air Pollutants (NESHAP) program.

The permit action is for operation of the facility. The permit action is a state total facility individual permit, therefore, the draft permit has been placed on public notice.

A summary of the Potential-to-Emit in tons per year is as follows:

Pollutant	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOCs	CO	CO <sub>2e</sub>	Lead
Total Facility PTE	1.361	2.543	2.213	0.0276	23.36	0.724	5.876	7736	0.000069

PM = Particulate Matter

PM<sub>2.5</sub> = PM, 2.5 microns and smaller

NO<sub>x</sub> = Nitrogen Oxides

CO = Carbon Monoxide

PM<sub>10</sub> = PM, 10 microns and smaller

SO<sub>2</sub> = Sulfur Dioxide

VOCs = Volatile Organic Compounds

CO<sub>2e</sub> = Carbon Dioxide Equivalents as defined in Minn. R. 7007.0100

The Permittee is not required to submit a pollution prevention progress report pursuant to Minn. Stat. § 115D.08.

The preliminary determination to issue this Air permit is tentative.

## Procedure for public participation

As stated in Minn. R. chs. 7000 and 7001, there are three formal procedures for public participation in the MPCA's consideration of this matter. Interested persons may:

- (1) Submit written comments on the draft permit.
- (2) Petition the MPCA to hold a public informational meeting.
- (3) Petition the MPCA to hold a contested case hearing.

## Submitting written comments

To submit comments or petitions to the MPCA through the mail or email, you must state:

- (1) Your interest in the permit application or the draft permit.
- (2) The action you wish the MPCA to take, including specific references to the section of the draft permit you believe should be changed.
- (3) The reasons supporting your position, stated with sufficient specificity as to allow the MPCA to investigate the merits of the position.

## Public informational meeting

A public informational meeting is an informal meeting during which interested persons can ask questions concerning the proposed facility. MPCA staff will be present to provide information. If an interested person would like the MPCA to hold a public informational meeting, the person should include all information identified above and in addition include a statement of the reasons the person desires the MPCA to hold a public informational meeting and the issues that the person would like the agency to address at the public informational meeting.

## Contested Case Hearing

A contested case hearing is a formal proceeding before an administrative law judge empowered to advise the MPCA regarding issues of fact. As described in Minn. R. 7000.1800, persons who submit petitions for a contested case hearing must also state the issues they propose to address in a contested case hearing, the specific relief requested or resolution of the matter, and the reasons (which may be in the form of proposed findings) supporting an MPCA decision to hold a contested case hearing. Failure to comply with these rules exactly may result in a denial of the request. To the extent known, the petitioner may also submit a list of prospective witnesses to be called at a hearing, a proposed list of publications, references, or studies to be introduced at a hearing and the approximate time required for the petitioner to present the matter at a hearing. The decision whether to hold a contested case hearing will be made under Minn. R. 7000.1900.