From: Katie Hill Brandt
To: Cordes, Richard M (MPCA)
Cc: ben.bertram@sanimax.com
Subject: Re: Response and comments
Date: Tuesday, February 03, 2015 4:36:32 PM
Attachments: Sanimax PTE Calculations_2015.02.03.xlsx

Dick,

I have attached revised emission calculations for Sanimax with your requested edits. Note that for EU020 and 021 (SV018), the controlled VOC emission rates are now changed to assume 0% VOC control efficiency from the Venturi scrubber on that process. (Previous versions of the PTE calculations assigned a VOC control efficiency of 90% to that process, which seems to be a carry-over from the last permit amendment calculations.) Let me know if you have any questions on that change.

We are planning to submit a permit amendment application for a name change within the next week.

Also, Troy Bech is leaving Sanimax for a new job, so please copy Ben Bertram on any future correspondence. He is copied on this email.

Thank you,

Katie Hill Brandt, PE | Environmental Engineer
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From: "Cordes, Richard M (MPCA)" <richard.cordes@state.mn.us>
To: "Katie Hill Brandt (SEH)" <khillbrandt@sehinc.com>,
Cc: "Troy A. Bech (troy.bech@sanimax.com)" <troy.bech@sanimax.com>
Date: 01/30/2015 11:52 AM
Subject: Response and comments

Katie –

It's nearly the end of the week and I wanted to respond to a couple of issues and provide comments on the spreadsheet.

- Please submit a separate application for a permit amendment for the name change. We can incorporate this into the current permit action, but it needs to come in separately.

- If Sanimax wants to be a state source following this permit action, we will need to issue a total facility permit (similar to a Part 70 reissuance). I haven't looked at the application for the Part 70 reissuance, but it should contain all the information I would need to issue a state permit. The state permit would likely be non-expiring. (I would

need to confirm this.)

- Here are some comments on the spreadsheet, which I continue to review:
- At the beginning of 2014, the global warming potentials of GHG pollutants were changed. Please update the spreadsheet to reflect these new GWPs. See Table A-1 to Subpart A of Part 98.
- The text in several cell in spreadsheet tab "Combustion (Proposed)" refers to RAFVO. It should be deleted.
- Please correct and update the "maximum unlimited" emissions. The values that we request in the permit application refer to emissions without control. Your spreadsheet provides a controlled value. In some cases, the value would be the same (such as if there are no controls). In other cases, it's pretty easy for me to calculate (such as when the control efficiency is 90% or 99%.) However, there are some places where a controlled value is provided but no control efficiency is identified.

Please let me know if you have any questions.

Richard Cordes, P.E.
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