From: Cordes, Richard M (MPCA)
To: "Katie Hill Brandt"
Subject: RE: Sanimax - Outstanding Questions
Date: Wednesday, September 16, 2015 2:19:00 PM

Katie –

Thanks for your message. In response to your questions:

- A couple of questions have arisen during my more recent work on the permit. I will contact you about them unless I find that I already have the information in-house.
- There is no two-stage permit issuance for state permits, as EPA receives its 45-day review only for *Part* 70 operating permits. The state permit will be issued after the 30-day comment period and after addressing any comments. (There is no second stage.)
- I have heard nothing more on the application fee. As you note, there will be additional points for the permit itself.

Dick

From: Katie Hill Brandt [mailto:khillbrandt@sehinc.com]
Sent: Wednesday, September 16, 2015 11:29 AM
To: Cordes, Richard M (MPCA)
Subject: Sanimax - Outstanding Questions

Hi Dick,

Given the uncertainties on the timing of your database switch and the issuance of the Sanimax draft permit, I just want to verify that we are on the same general track that was proposed back in May (per your email below) with the understanding that the draft permit is likely still a few months away.

- Do we still need to wait until the draft permit and updated CD-01s are available before we submit the final certified copy of the application? We have the forms drafted, but I don't want to jump the gun on submitting them just yet.
- Is the option still there to pursue a two-stage permit issuance?
- Let me know if you have any new information on the application fee. We are under the impression that no additional fee is required for the initial state permit application, but we do understand that a final invoice will be issued to cover the cost of the "additional points" for NSPS. NESHAP, etc. review.

Thanks much,
Katie

Katie Hill Brandt, PE | Environmental Engineer
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From: "Cordes, Richard M (MPCA)" <richard.cordes@state.mn.us>

To: "Ben Bertram (Sanimax)" <ben.bertram@sanimax.com>, "Katie Hill Brandt (SEH)" <khillbrandt@sehinc.com>,
Date: 05/17/2015 10:49 AM
Subject: Draft permit

Mr. Ben Bertram

Project Manager

Sanimax USA, LLC

505 Hardman Ave S

South St. Paul, MN 55075

Dear Mr. Bertram:

In response to your permit application, we prepared a draft version of Air Emission Permit No. 03700070-007. I have enclosed a copy of the draft permit and the Technical Support Document for your facility located at 505 Hardman Ave S, South St. Paul, Dakota County, Minnesota. These documents are for your review.

Please check the information in the permit. Your Air Emission Permit will contain conditions and limitations under which your facility must operate. Make sure that you understand these conditions and limitations. **By accepting the terms of the permit, you agree that they are appropriate for your facility and that you will comply with them.**

Key changes to the permit include:

- A change to the name of the facility.
- The additional of EU 023 (Boiler No. 3).
- The required removal of EU 001 (Boiler No. 1).
- The addition of a 15 ppm limit on the sulfur content of liquid fuels.
- The removal of the facility-wide SO2 limit.
- The elimination of authorization to use RAFVO as a fuel.
- Updated operating pressure drop ranges for Venturi scrubbers.

Please notify me of any corrections in writing, ideally by the end of the day on Wednesday, May 20, 2015. As I have indicated previously, the MPCA is planning to change its permitting software soon. Based on current information, it's likely that I will be unable to change conditions in the draft permit after Friday, May 22, 2015 until some date in June. Receiving

your comments by the end of the day on May 20th will allow me to prepare the draft permit for public notice.

Here is some information about steps involved in processing the permit:

- Sanimax will receive an invoice for "Additional Points." (See Attachment 3 to the Technical Support Document.) The invoice must be paid prior to the start of the public comment period.
- Sanimax must prepare an updated permit application. The MPCA must receive the updated, certified permit application prior to the start of the public comment period. (I will provide the CD-01s for the updated permit application after I incorporate any changes to the permit.)
- Due to the planned change to the permitting software, the final permit will be in a different format than the draft permit. To the extent possible, I will attempt to keep the permit language the same.

I would also like your input on a couple of details related to the permitting process:

- Would you like to pursue 2-stage issuance? This usually allows the MPCA to issue a construction authorization a couple of weeks earlier than our default 1-stage process. (The 2-stage permit language differs from the 1-stage permit only in the cover page. In the draft permit, the 2-stage language is in green, while the 1-stage language is in yellow. Language that is not highlighted is common to both processes.)
- Would you like to handle and pay for the public notice? This usually allows for the public notice to be published about a week earlier than if the MPCA pays for the notice.

If you have questions about the draft permit, contact me at 651-757-2291. Your assistance is appreciated.

Sincerely,

Richard Cordes, P.E.

Principal Engineer

Air Quality Permit Section
Minnesota Pollution Control Agency

richard.cordes@state.mn.us

Phone: (651)757-2291

Fax: (651)296-8717
[attachment "20150517 Permit.pdf" deleted by Katie Hill Brandt/seh] [attachment "20150517 TSD.pdf" deleted by Katie Hill Brandt/seh]