From:	Katie Hill Brandt
To:	Cordes, Richard M (MPCA)
Cc:	Bech, Troy - 1520; Bertram, Benjamin - 1230; Moyer, Michael - 1510; Kedrowski, Tim - 1534; tpotas@sehinc.com
Subject:	Sanimax Air Permit Amendment Application - Response to Questions
Date:	Thursday, January 15, 2015 9:09:19 AM
Attachments:	Sanimax PTE Calculations_2015.01.14_.xlsx Email RE_ Sanimax Venturi Pressure Drop Ranges.pdf Email from Cordes - Initial Comments on Supplemental Information.pdf

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Hello Dick,

Sanimax has resumed work on their boiler replacement project. Their proposed plan is to replace their oldest boiler (EU001, Boiler #1, 51 MMBtu/hr) with a new, low-NOx, natural gas-fired boiler with diesel back-up (EU023, Boiler #3, 75 MMBtu/hr). Boiler #1 will be completely removed from service and NOT used as an emergency back-up unit. We assume that we will be able to conduct Equivalent or Better Dispersion Modeling for the project in lieu of refined modeling. The modeling protocol will be submitted in the next one to two weeks. If modeling dictates that any stack parameter changes are needed to demonstrate equivalent or better dispersion, we will let you know.

Below are the responses to the questions you posed on 9/19/2013 (your original email is attached for your reference). We will continue to review the information that has been submitted to MPCA to date for this project and make updates to application forms as needed. Please let us know if you have any questions or need any additional information. A conference call early next week to discuss the project timeline would be appreciated. Let us know what works best with your schedule.

- Please provide an updated, unlocked calculation spreadsheet. **– Please see the attached file to replace the one that was sent on 9/20/13.**
- Please provide a summary of what portions of the initial application should be retained and what should be ignored. This should include answers to the following questions:
  - Do the stack parameters, etc., for Boiler #1 now differ from what was presented in the original application? **– Boiler #1 will be removed from the permit and replaced by Boiler #3.**
  - Does the NSPS for Boiler #3 remain the same as was presented in the original application? – **NSPS Dc for Boiler #3 remains the same as presented in the highlighted copy of the rule that I emailed to you on July 26, 2013.**
  - **Updates to the initial application (submitted in May 2013):**
    - **Potential emissions from combustion units have been updated; see the attached PTE calculations.**
    - **The proposed boiler will be a permanent unit, not a "temporary" boiler.**
    - **The facility has proposed to remove refined animal fats and vegetable oils (RAFVO) from the list of acceptable boiler fuels.**
  - **Portions of the initial application to retain:**
    - **With the removal of Boiler #1 (and with it the option to combust #6 fuel oil), the facility will no longer need a facility-wide SO2 limit of 240 tpy and associated operating and recordkeeping requirements. This change will allow the facility to operate with a State Permit instead of a Title V Permit.**
    - **The facility has requested that the operating pressure drop ranges for their Venturi scrubbers (CE001, CE003, and CE012) be expanded to a range of 3.5 to 7.0 inches of water column. (Please see the attached email correspondence with Robert Beresford of MPCA regarding this request.)**
- Please confirm that Boiler #3 will not be used to generate electricity. **– Boiler #3 will not be used to generate electricity. It will be used to generate steam for the facility.**
- Portions of 40 CFR 63.11214(b) are highlighted, indicating that the regulation applies to an existing boiler. Does this apply to Boiler #3 or to Boiler #1? **– I should have highlighted "new boiler" instead of "existing boiler." Boiler #3 is considered a new boiler under this rule, since it will commence**

construction after June 4, 2010.

- 40 CFR 63.11214(d) is highlighted. This appears to conflict with 40 CFR 63.11210(e), which is also highlighted. Please clarify. **– I concur that 40 CFR 63.11214(d) is superseded by 40 CFR 63.11210(e) that that the facility is not subject to emission limits in Table 1 of the subpart.**
- 40 CFR 63.11222(a) is highlighted. This appears to conflict with 40 CFR 63.11210(e), which is also highlighted. Please clarify. **– I concur that 40 CFR 63.11222(a) is superseded by 40 CFR 63.11210(e) that that the facility is not subject to emission limits in Table 1 of the subpart.**
- When should the MPCA expect to receive additional modeling information? **– Work has resumed on the modeling. We expect to submit the modeling protocol within one to two weeks.**

Regards,
Katie

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