From:	Katie Hill Brandt
To:	Cordes, Richard M (MPCA)
Cc:	ben.bertram@sanimax.com
Subject:	Additional Information - Sanimax
Date:	Wednesday, September 02, 2015 4:51:17 PM

Dick,

Thanks for speaking with me today. Here is a recap of our discussion and some additional information:

- Sanimax has a start-up date of 1/1/1994 for Boiler #2.

- Regarding refined animal fats, your concern is making sure that Sanimax has the necessary records on file to prove that the material meets the EPA's legitimacy criteria in 40 CFR Part 241. When Sanimax purchases third party material, they receive a document with guarantees on product specifications which shows that the product has been sufficiently processed/refined and indicates that the material is handled as a valuable commodity (much like the documentation attached to a shipment of fuel oil). If additional information is required by MPCA enforcement staff, Sanimax is willing to work with them to make sure they have the necessary documentation on file prior to firing these fuels in their boilers (at this point they have not yet fired refined animal fats in their boilers).

It might be helpful to MPCA enforcement staff to point out that the EPA's response to comment on this rule fully supports the use of process fats as fuels and that process fats inherently meet the legitimacy criteria in 40 CFR Part 241. EPA states, "We recognize….that these non-hazardous secondary materials contain lower concentrations of contaminants than traditional fuels, and as such, are being encouraged for use instead of fossil fuels. In addition, since the fats are managed the same way that traditional oil is, it is evident that the material is handled as a valuable commodity, meeting the legitimacy criterion. Additionally, the material meets the legitimacy criterion for a meaningful heating value. [….] We would note that the rendering process "sufficiently processes" the material into a non-waste fuel that meets the legitimacy criteria. [...] Thus, the final rule establishes these non-hazardous secondary materials, after begin processed, as a non-waste fuel."
Source: http://www.regulations.gov/#!documentDetail;D=EPA-HQ-RCRA-2008-0329-1734

- As for timing of the draft permit, the MPCA's impending database switch is causing uncertainties, since the permit will need to be issued via the new database. We hope to have a timeline for permit issuance soon.

Thanks,
Katie

Katie Hill Brandt, PE | Environmental Engineer
SEH | 3535 Vadnais Center Drive | St. Paul, MN 55110
651.490.2032 direct | 612.723.6704 cell | 651.490.2150 fax
www.sehinc.com
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