From: Cordes, Richard M (MPCA)
To: Katie Hill Brandt (SEH); Ben Bertram (Sanimax)
Subject: Sanimax permit update and timing
Date: Friday, May 08, 2015 12:08:00 PM

Katie and Ben –

We held a meeting with management on Wednesday (5/6/15) to review the results of the most recent modeling provided by you for the proposed installation of the new boiler at Sanimax. Our managers have now approved moving forward with the permit. Until we received this approval, we were not able to move forward with the permit.

I plan to complete the draft/proposed permit this week or early next week. The MPCA's internal review will take place during the following week. After I make any required changes, I will provide the draft/proposed permit to Sanimax for its review. (I'm targeting May 18th for getting you the draft permit.) I will then review the comments I receive from you and make needed changes. I can then provide the CD-01s to be incorporated into an updated, certified permit application that Sanimax must provide. The permit application must reflect the final configuration of the planned changes with applicable requirements identified, and be signed by a responsible company official.) After I receive the updated permit application, I will take steps to place the permit on public notice. At this point, the MPCA will send Sanimax an invoice for an additional permitting fee. The fee must be paid before the permit can be placed on public notice. The public has 30 days following public notice to comment on the permit. EPA has 45 days to review the permit; its review restarts if the MPCA receives comments on the permit during the public comment period (even if the comments are from Sanimax).

A complicating factor is that our current permitting database will be shut down after May 22, 2015. I will not be able to make any changes to the draft permit after that time until early June. If I receive comments from you after ~May 20, 2015, I will not be able to work on the permit for a couple of weeks. In addition, the changes will need to be made in our new permitting database. I am not sure how long it will take me to make the transition to the new database, as the new permitting system will need to include all the information from the existing permit (Air Emission Permit 03700070-006) plus I will need to add the new project.

The following options could potentially speed permit issuance:

- Prepare all elements of the updated permit application so that the application can be submitted soon after I provide to you the updated CD-01s.
- Pay for the public notice to be placed in the newspaper.
- If desired, the MPCA can issue the permit in two steps. The first step would allow construction of the new unit and would typically be issued within a few days or so after the completion of the public comment period. The second step allows operation of the new unit; it follows completion of EPA's 45-day review.

Let me know if you would like to pursue any or all of these options. Call me if you have any questions.

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

Richard Cordes, P.E.
Principal Engineer
Air Quality Permit Section
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richard.cordes@state.mn.us
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