From:	Cordes, Richard M (MPCA)
To:	Ben Bertram (Sanimax); Katie Hill Brandt (SEH)
Subject:	Draft permit
Date:	Sunday, May 17, 2015 10:48:00 AM
Attachments:	20150517 Permit.pdf 20150517 TSD.pdf

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.
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Air Quality Permit Section
Minnesota Pollution Control Agency
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