From: Cordes, Richard M (MPCA)
To: Katie Hill Brandt
Cc: Bertram, Benjamin - 1230
Subject: RE: Draft Permit and Technical Support Document
Date: Monday, February 08, 2016 10:41:22 AM

Katie –

Thanks for the comments. I'm planning to make the first two changes. There are also a couple of things I want to clean up in the permit, primarily for consistency between the boilers. Those won't be significant changes.

You asked about the performance test requirement for the Ring/Blood Dryer/Oven. The PM2.5 modeling demonstrates that there is the potential for ambient air quality problems if the emissions from the facility are increased slightly. There doesn't appear to be any recent stack testing for particulate matter, so I thought it was important to physically measure the emissions from one or more units at the facility for they could be compared to the estimated values. Since the particulate emission factors for the Dryer/Oven are a composite of more than one emission factor, the resulting emission factor seemed less certain; to me, this made the Dryer/Oven a good choice to test.

Let me know if you have additional questions or comments.

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

From: Katie Hill Brandt [mailto:khillbrandt@sehinc.com]
Sent: Friday, February 05, 2016 10:10 AM
To: Cordes, Richard M (MPCA)
Cc: Bertram, Benjamin - 1230
Subject: Re: Draft Permit and Technical Support Document

Hi Dick,

Here are our comments/questions on the Sanimax draft permit. Thank you.

Page 20 – 5.7.8, 5.7.9 Page 35 - 5.10.11, 5.10.12 Page 52 - 5.14.9, 5.14.10	Is sulfur content of fuel limit in weight percent? If so, please add "weight" to the wording.
Page 38 – 5.10.25-5.10.27	This section lists 2 Operating Scenarios for Boiler No. 3 (for compliance with 40 CFR 63 Subpart JJJJJJ). Could similar language be added for Boiler No. 1 and 2 also?
Page 84 – 6.2.1	What is the reason for requiring PM2.5 testing of ring/blood dryer/oven? The facility is not requesting any changes to this source.

Katie Hill Brandt, PE, Environmental Engineer
SEH

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From: "Cordes, Richard M (MPCA)" <richard.cordes@state.mn.us>
To: "Bertram, Benjamin - 1230" <ben.bertram@sanimax.com>
Cc: "Katie Hill Brandt (SEH)" <khillbrandt@sehinc.com>
Date: 01/29/2016 10:42 AM
Subject: Draft Permit and Technical Support Document

January 26, 2016

Mr. Ben Bertram
Project Manager
Sanimax USA, LLC
505 Hardman Ave S
South St. Paul, MN

RE: Issuance of Air Emission Registration Permit No. 03700070-007

Dear Mr. Bertram:

In response to your permit application, the MPCA prepared a draft version of Air Emission Permit No. 03700070-007. I have enclosed a copy of draft Air Emission Permit No. 03700070-007 and a copy of the Technical Support Document for your facility located at 505 Hardman Ave S in South St. Paul, MN, Dodge County, Minnesota. This copy is 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. In particular, note that there are conditions at the total facility (TFAC) level that require air dispersion modeling when you make certain changes to the facility.

Make sure that you understand the conditions and limitations in the permit. **By accepting the terms of the permit, you agree that they are appropriate for your facility and that you will comply with them.**

Please notify me of any corrections in writing within 7 day of the date of this email. If I receive no comments from you, or if you are unable to provide comments within 7 days, I will proceed with the public notice process and you may comment during the public notice period.

If you have questions about the draft permit, I may be reached at (651)757-2291 or by email at richard.cordes@state.mn.us. Your assistance is appreciated.

Sincerely,

Richard Cordes

Richard Cordes, P.E.
Staff Engineer

Air Permits Section
Industrial Division

Enclosures

Cc: AQD File No. 578
Dan Dietrich, MPCA
[attachment "Sanimax USA LLC Draft Permit .rtf" deleted by Katie Hill Brandt/seh] [attachment "TSD Attachment 1 PTE Calculations.pdf" deleted by Katie Hill Brandt/seh] [attachment "TSD Attachment 2 Points Calculator.pdf" deleted by Katie Hill Brandt/seh] [attachment "TSD Attachment 3 Sanimax Memorandum.pdf" deleted by Katie Hill Brandt/seh] [attachment "Draft Sanimax TSD.DOCX" deleted by Katie Hill Brandt/seh]