

The following includes permit conditions of concern with specific concerns highlighted. These conditions are followed by our requests to enhance our understanding of the intent and expectation of each permit condition.

5.2.4	Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain the total methanol emissions used under COMG 2. Emissions shall be calculated by: $E = (WC * EF) / 2000$ Where: E = Methanol Emissions (tons) WC = The number of wood charges dried EF = The methanol emissions factor. [Minn. R. 7007.0800, subps. 4-5, Title I Condition: Avoid major source under 40 CFR 63.2]
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It is common practice within the industry to calculate emissions using approved species-specific emissions factors. We would appreciate a separate written response approving our use of species-specific emissions factors. This aids us for internal audits of our environmental management system.

5.2.5	Emission Factor: The Permittee shall use the following emission factor of 0.12 lb/mbf for methanol or on-site generated emission factors, or voluntary industry testing standards. The Permittee shall submit to the Commissioner for approval on-site generated emission factors and voluntary industry testing standards within 60 days before use, and shall not use such factors until approved by the Commissioner. [Title I Condition: Avoid major source under 40 CFR 63.2]
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While approved species specific emission calculations can be found in in the TSD titled “PTE Summary and Emission Increase Calculation Spreadsheets”, we expect that without sufficient documentation approving the species-specific emissions factors, this will be an ongoing finding in our internal environmental audits of our environmental management system. A separate written response from MPCA approving our species-specific emissions factors would greatly aid in addressing this concern.

<p>5.5.22, 5.6.20</p>	<p>The Permittee must prepare by March 1, and submit to the Administrator upon request, a biennial compliance certification report for the previous biennial period containing the information described below. The Permittee must submit the compliance report by March 15 if the Permittee had any instance described by item 3 below. (1) Company name and address (2) Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR pt. 63, subp. JJJJJ. The notification must include the following certifications of compliance, as applicable, and signed by a responsible official. (i) "This facility complies with the requirements in 40 CFR Section 63.11223 to conduct a biennial tune-up, as applicable, of each boiler." (ii) "This facility complies with the requirement in 40 CFR Section 63.11214(d) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available." (3) If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken. [40 CFR 63.11225(b), Minn. R. 7011.7055]</p>
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We have had some confusion interpreting this condition (e.g., is this report mandatory, or is it only submitted upon request? As a biennial report, which year would the first report be due?). We request some additional guidance in this permit condition to ensure we meet the MPCA's expectation.

5.3.7, 5.4.7, 5.5.11, 5.6.12	COMS Daily Calibration Drift Test: The Calibration Drift must be quantified and recorded at zero (low-level) and upscale (high-level) calibration drift at least once daily according to the procedures listed in 40 CFR 60.13(d)(2) and pt. 60, Appendix B, PS 1. The zero and upscale calibration levels must be determined using the span value specified in the applicable requirement. If the applicable requirement does not specify a span value, a span value of 60, 70, or 80 percent opacity must be used unless an alternative span value is approved by the commissioner. 40 CFR pt. 60, Appendix F must be used to determine out-of-control periods for COMS. [40 CFR 60.13(d)(1), Minn. R. 7017.1215]
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We would like to request the use of an alternative span value including the range of 30-40% for daily calibration drift tests. After speaking with our contractor, this sounds appropriate for an opacity monitor that includes a 20% opacity limit (i.e., opacities of 60-80% are already well beyond our limit).

6.4.1	Particulate Matter: The Permittee shall conduct a performance test due before 6/21/2027 and every 60 months thereafter to verify the emission of particulate matter. The first test is due by the date specified above and all subsequent tests shall be completed every 60 months thereafter by the due date (month and day) and as described below. The performance test shall be conducted at worst-case conditions defined at Minn. R. 7017.2005, subp. 8 or at the operating conditions described at Minn. R. 7017.2025, subp. 2, using EPA Reference Methods 5 and 202, or other method approved by MPCA in the performance test plan approval. Testing conducted during the 60 days prior to the performance test due date will not reset the test due date for future testing as required by this permit or within a Notice of Compliance letter. Testing conducted more than 60 days prior to the performance test due date satisfies this test due date requirement but will reset future performance test due dates based on the performance test date. [40 CFR 60.45c, Minn. R. 7017.2020, subp. 1]
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Our current air permit requires that we performance test EQUI 6 by 6/21/2025. On 4/18/2025 we submitted a Performance Test Notification and Plan for testing on 5/21/2025. We request the permit specify the next required performance test be conducted before 5/20/2030 and 60 months thereafter.

We appreciate the opportunity to provide comments on the draft air permit. And we value the MPCA's assistance in ensuring that our permit is easily interpretable to support the resiliency of our environmental compliance efforts. We believe that these comments enhance the draft permit towards that goal.