

STATE OF MINNESOTA
MINNESOTA POLLUTION CONTROL AGENCY

In the Matter of Federal Hoffman, Incorporated

Proceedings to Develop
and Implement a State Implementation
Plan for the Twin Cities Sulfur Dioxide
Nonattainment Area to Demonstrate,
Attain and Maintain Compliance with the
National Ambient Air Quality Standards
for sulfur dioxide as required by the
Clean Air Act Section 110, 172 and 191
of the Clean Air Act, 42 U.S.C. §§ 7410,
7502 and 7514.

FINDINGS AND
ORDER

The Minnesota Pollution Control Agency (MPCA), being fully advised in the premises, hereby adopts the following Findings and Order.

FINDINGS

1. The U.S. Environmental Protection Agency (EPA) is required by section 109 of the Clean Air Act, 42 U.S.C. § 7409, to promulgate national ambient air quality standards (NAAQS). The EPA has promulgated NAAQS to protect the public health (primary standards) and the public welfare (secondary standards). 40 CFR pt. 50 (1990).

2. Among other pollutants, EPA has promulgated primary NAAQS for sulfur dioxide. The primary NAAQS for sulfur dioxide is 0.03 parts per million (ppm) annual arithmetic mean and 0.14 ppm maximum 24-hour concentration, not to be exceeded more than once per year. 40 CFR pt. 50.4 (1990). The secondary

NAAQS for sulfur dioxide of 0.5 ppm maximum three-hour concentration, not to be exceeded more than once per year, 40 CFR § 50.5 (1990).

3. Each state is obligated by section 110(a) of the Clean Air Act, 42 U.S.C. § 7410, to develop a plan which provides for "implementation, maintenance, and enforcement" of the NAAQS promulgated by the EPA.

4. The EPA has promulgated requirements for implementation plans titled "Requirements for Preparation, Adoption and Submittal of Implementation Plans." 40 CFR pt. 51 (1990).

5. The MPCA is a statutory agency of the State of Minnesota, charged with the responsibility to administer and enforce laws and promulgate rules to prevent water, air and land pollution throughout the State of Minnesota. Minn. Stat. chs. 115, 115B and 116 (1990).

6. The MPCA is empowered to promulgate standards and rules for the prevention, abatement or control of air pollution related, without limitation, to "sources or emissions of air contamination or air pollution, to the quality or composition of such emissions, or to the quality of or composition of the ambient air or outdoor atmosphere or to any other matter relevant to the prevention, abatement or control of air pollution." Minn. Stat. § 116.07, subd. 4 (1990). See Minn. Stat. § 116.07, subd. 2 (1990).

7. The MPCA has the authority to enforce any statute or rule related to air pollution by, among other things, adopting, issuing, entering into or enforcing "reasonable orders, schedules of compliance and stipulation agreements." Minn. Stat. § 116.07, subd. 9 (1990).

8. Minn. Stat. § 115.071 (1990) provides that the provisions of chapters 115 and 116 and "all rules, standards, orders, stipulation agreements, schedules of compliance, and permits adopted or issued" by the MPCA may be enforced by criminal prosecution, action to recover civil penalties,

injunction, action to compel performance, or other appropriate action.

Specifically, in an action to compel performance of an order of the MPCA, the regulated party may be required "to do and perform any and all acts and things within the defendant's power which are reasonably necessary to accomplish the purposes of the order." Minn. Stat. § 115.071, subd. 5 (1990).

9. The MPCA has promulgated primary ambient air quality standards for sulfur dioxide of 0.03 ppm annual arithmetic mean and 0.14 ppm maximum 24-hour concentration, not to be exceeded more than once per year. Minn. Rules pt. 7005.0080 (1991). The MPCA has also promulgated secondary ambient air quality standards for sulfur dioxide of 0.5 ppm maximum three-hour concentration, not to be exceeded more than once per year in Air Quality Control Region 131. Minn. Rules pt. 7005.0080 (1991). AQCR 131 encompasses the seven county Twin Cities metropolitan area defined at 40 CFR pt. 81.27 (1990). Minn. Rules pt. 7005.0080 (1991).

10. AQCR 131 is classified as a nonattainment area for the primary NAAQS for sulfur dioxide. 40 CFR § 81.324 (1990).

11. The MPCA staff performed or reviewed and approved a computer modeling analysis of AQCR 131 to determine which sources are major contributors to the sulfur dioxide nonattainment status of AQCR 131. This modeling was initiated prior to the publication of the revised modeling guidelines in the September 9, 1986, Federal Register (51 Fed. Reg. 32176) and conforms to the EPA Guideline Air Quality Dispersion Model RAM version 5.0 and CDM version 2.0. Where, as here, a modeling analysis was initiated before the revised guidelines were published, EPA continues to allow states to use Model RAM 5.0 and CDM version 2.0 in analyzing a nonattainment area. More recently, and where appropriate, the modeling for AQCR 131 was supplemented using ISCST version 90346.

12. The computer modeling analysis for AQCR 131 shows that, among others, Federal Hoffman, Inc.'s Anoka manufacturing facility is a major contributor of sulfur dioxide emissions in AQCR 131. Federal Hoffman, Inc.'s Anoka manufacturing facility is located at 900 Ehlen Drive in the city of Anoka, in Anoka County in the state of Minnesota. Federal Hoffman, Inc.'s Anoka manufacturing facility is a sulfur dioxide emission source culpable for the nonattainment status of AQCR 131. Sulfur dioxide emissions from Federal Hoffman, Inc.'s manufacturing facility contribute to a violation of the primary and secondary NAAQS for sulfur dioxide.

13. Computer modeling shows that AQCR 131 will attain and maintain compliance with the sulfur dioxide NAAQS if: (a) Federal Hoffman, Inc.'s Anoka manufacturing facility is operated in compliance with the requirements of this Order; (b) other facilities receiving orders are operated in compliance with the conditions of their orders; and (c) all other facilities in the area are operated in compliance with the limits that apply under state rules.

14. Federal Hoffman, Inc.'s manufacturing facility emits pollutants into the ambient air in sufficient quantities to require an air emission permit pursuant to Minn. Stat. § 116.081 (1990) and Minn. Rules pts. 7001.0030 and 7001.1210 (1991). On April 18, 1991, the MPCA issued air emission permit No. 59-91-OT-1 to Federal Hoffman, Inc. authorizing the operation of its Anoka manufacturing facility under specified terms and conditions. That permit remains in effect today, and is not suspended, revoked or superseded by the issuance of this Order. This Order imposes additional requirements on Federal Hoffman, Inc., as specified in Parts I through VI below, to assure that AQCR 131 will achieve and maintain compliance with the NAAQS for sulfur dioxide. To the extent there is a conflict between operating limitations authorized by the permit and this Order, Federal Hoffman, Inc. shall comply with the more stringent requirements.

ORDER

NOW, THEREFORE, IT IS ORDERED, for the purposes of demonstrating reasonable progress and attaining, demonstrating and maintaining compliance with the NAAQS for sulfur dioxide as set forth in 40 CFR pts. 50.4 and 50.5 (1990), Federal Hoffman, Inc. (Company) shall operate its Anoka manufacturing facility (Facility) in compliance with the following requirements and limitations:

I. SULFUR DIOXIDE EMISSIONS CONTROL PLAN FOR THE FACILITY

A. General Operating and Maintenance Requirements. Exhibit 1, the Facility Description, which is appended to and incorporated as part of this Order, identifies the parameters used in the computer modeling performed to demonstrate that AQCR 131 will attain compliance with the sulfur dioxide NAAQS. Except as specifically allowed or required elsewhere in this Order, the Company shall operate and maintain the process and control equipment described in Exhibit 1 within the parameters set forth in Exhibit 1.

B. Emission Limitations. The emission units at the Facility that discharge sulfur dioxide emissions to the atmosphere are: Two boilers and three diesel generators. One of the boilers is limited to combusting natural gas; two other existing boilers have since been decommissioned. Each of these sources is more fully described in Exhibit 1, pts. 1.2.1 (Emission Point No. 69 - decommissioned boiler 56-4); 1.2.2 (Emission Point No. 70 -decommissioned boiler 56-3) 1.2.3 (Emission Point No. 71 - boiler 56-2 (gas only); 1.2.4 (Emission point No. 72 - boiler 56-1); 1.2.5 (Emission Point No. 82- diesel generator 55-3); 1.2.6 (Emission Point No. 83 - diesel generator 167-1); and 1.2.7 (Emission Point No. 84 - diesel generator 169-1). The Company shall limit its emissions of sulfur dioxide from Emission Point No. 72 to no more

than 2.0 pounds per million British Thermal Units (lb/MMBtu) and Emission Point Nos. 82, 83 and 84 to no more than 0.50 lb/MMBtu. The basis for these limitations is Minn. Rules pt. 7005.0320, subpart 2, (1991) and 40 CFR Part 50 (1990), respectively.

C. Additional Operating Requirements.

1. Capacity Limitation. The Company may operate boiler No. 56-1 identified as Emission Point No. 72 described in I.B. at the rated heat input, but may not operate them at greater than the rated heat input as described in Exhibit 1. The Company shall not operate existing boilers 56-3 and 56-4 (Emission Point Nos. 69 and 70).

2. Fuel Restrictions. The Company is authorized to burn only natural gas in boiler 56-2 (Emission Point No. 71); the Company is authorized to burn natural gas and residual fuel oil in boiler No. 56-1 (Emission Point No. 72); the Company is authorized to burn only No. 2 diesel fuel in the diesel generators (Emission Point Nos. 82, 83, and 84) described in I.B. The residual fuel usage shall be limited to less than 2,500 gallons per day. The sulfur content of the residual fuel shall not exceed two percent by weight. The sulfur content of the diesel fuel shall not exceed 0.5 percent by weight.

D. Demonstration of Compliance with Emission and Operating Limitations.

The Company shall demonstrate compliance with sulfur dioxide emission limitations and operating requirements of Part I of this Order as follows:

1. Fuel Oil Sulfur Content and Heating Value. The Company shall sample and analyze residual fuel oil in accordance with the following:

a. This part applies to each of the fuel oil tanks that supply residual fuel oil to boiler No. 56-1, that exhausts through Emission Point No. 72 of this Order.

b. Immediately after a fuel tank is filled and before any oil is combusted, the Company shall collect a sample of fuel in the tank. The sample method shall be in accordance with ASTM Method D-270.

c. The Company shall analyze the oil sample to determine the sulfur content of the oil. The analysis shall conform to ASTM Method D-1552.

d. The Company shall analyze the oil sample to determine the heating value of the oil. The analysis shall conform to ASTM Method D-240.

e. If a partially empty fuel tank is refilled, a new sample and analysis of the fuel in the tank is required upon filling.

2. Fuel Oil Sulfur Content and Heating Value. The Company shall obtain the No. 2 diesel fuel sulfur content and heating value by either sampling and analyzing the fuel oil in accordance with D.1.b through f. of this Order OR in accordance with the following method:

a. This part applies to each of the fuel oil tanks that supply fuel oil to the diesel generators that exhaust through Emission Point Nos. 82, 83 and 84 of the Order.

b. The Company shall obtain and maintain a fuel supplier certification from the fuel supplier for each shipment of distillate fuel oil delivered to the Facility. Each fuel supplier certification shall include the following information:

- 1) The name of the fuel oil supplier;
- 2) The location of the fuel oil when the sample was drawn for analysis to determine the sulfur content of the fuel oil, specifically including whether the fuel oil was sampled as delivered to the Facility, or

whether the sample was drawn from fuel oil in storage at the fuel oil supplier's or oil refiner's facility, or other location;

3) The sulfur content of the fuel oil from which the shipment came;

4) The method used to determine the sulfur content of the fuel oil; and

5) The heating value (in million British Thermal Units per gallons) of the fuel oil determined in accordance with ASTM Method D-240.

3. Boiler Efficiency and Amount of Fuel Oil Used. On an hourly basis, the Company shall use the steam output and efficiency calculations to estimate the total gallons of residual fuel oil burned at boiler No. 56-1.

II. CHANGES NOT REQUIRING A MODIFICATION OF THIS ORDER

The Company is authorized to make changes to the Facility without obtaining a modification to this Order as long as the change does not do or result in any of the following:

A. an exceedance of the limitations in the Order at which sulfur dioxide is emitted from any emissions unit at the Facility; or

B. an alteration of the boiler or the attached stack which could effect the emission characteristics.

III. CHANGES REQUIRING A MODIFICATION OF THIS ORDER

A. Activities that do require a modification to this Order prior to commencing the modification include, but are not limited to:

1. any decrease in the design stack gas volumetric flow rate below that contained in Exhibit 1;

2. any decrease in the design stack gas exit temperature below that contained in Exhibit 1;

3. any reduction in stack height below that contained in Exhibit 1;

4. any increase in the stack exit diameter above that contained in Exhibit 1; or

5. any construction or modification of structures within a radical distance equal to five building heights of the boiler stack and that increases the effective structural dimensions as they are used in the building wake effects algorithm in the ISC Air Dispersion Model.

B. Regardless of whether a modification of this Order is required, the Company shall obtain a permit amendment if required by state or federal law.

IV. RECORDKEEPING REQUIREMENTS

A. Record Maintenance

The Company shall keep and maintain all required documents, records, reports and plans identified in this Part IV in a form suitable to allow the EPA or MPCA staff to determine the Facility's compliance with this Order. The Company shall maintain the information at its Facility in files which are easily accessible for inspection by EPA or MPCA staff.

B. Recordkeeping Requirements

1. Permanent Records. The Company shall permanently maintain all of the following information, as well as all amendments, revisions or modifications made to this information.

a. Design, Construction and Operation Information. The Company shall maintain a file or files of information on the design, construction and operation of the sulfur dioxide emission sources, fuel systems, stack structures and other operational characteristics required to conduct sulfur dioxide ambient air quality modeling of emissions from the Facility. The file or files shall also include all information required to demonstrate that the equipment identified in Exhibit 1 is installed as described in that Exhibit. Where an activity has been undertaken pursuant to Part II of this Order, the

file or files shall include a description of each activity and all information required to demonstrate that the activity complies with each applicable Part II requirement.

b. Copy of this Order. The Company shall maintain a file at the Facility that includes this Order and the Exhibits attached and incorporated by reference in this Order.

2. Non-Permanent Records. Notwithstanding any document retention policy to the contrary, the Company shall retain the information identified below for a minimum of six years following the date on which the information was received by the Company. This retention period shall be automatically extended upon the written request of the Manager of the MPCA's Air Quality Division (AQD Manager).

a. Sulfur Dioxide Emissions and Operating Records. The Company shall generate and maintain records containing information to demonstrate compliance with the emission limitations and operating requirements specified in Part I of this Order. In order to demonstrate compliance with the emission limitations (Part I.B.), the Company shall retain the following records: the results of the fuel oil analyses that provide the percent by weight of sulfur in the fuel oil and the heating value of the fuel oil, the date the fuel oil was sampled, and the methods used to sample the fuel oil. In order to demonstrate compliance with the capacity limitation (Part I.C.1.), the Company shall retain records on the heating value of the fuel oil (million British Thermal Units per gallon) and the estimated number of gallons of the fuel oil burned on an hourly basis for boiler No. 56-1 by calculating the steam output and boiler efficiency. In order to demonstrate compliance with the fuel oil sulfur content restrictions and residual fuel oil usage limitation (Part I.C.2.), the Company shall retain records on the percent by weight of

sulfur in the fuel oil and the amount of residual fuel oil burned daily. The records shall be signed by the person entering information into the record.

b. Startup, Shutdown, Bypass, and Breakdown Records. The Company shall maintain files containing records for each startup, shutdown, bypass and breakdown for each piece of process equipment, control equipment, fuel supply system, emission stack, and any other piece of equipment to which this Order applies.

c. Excess Emissions and Noncompliance with Operating Requirements Records. The Company shall maintain files that record each exceedance of an emission limitation, capacity limitation, sulfur content in fuel oil limitation and fuel use limitation or specified in this Order. For each period of exceedance or noncompliance, the record shall include a description of the exceedance or noncompliance, its cause, the magnitude of the exceedance, and the date and time of commencement and cessation of the exceedance or noncompliance.

d. Reports Required by this Order. The Company shall maintain files containing the reports required by Part V of this Order.

V. REPORTING REQUIREMENTS

A. Notifications of Shutdowns and Breakdowns and Duty to Minimize Adverse Impact on Air Quality.

1. Notification of Process or Control Equipment Shutdown. In accordance with Minn. Rules pt. 7005.1880 (1991), the Company shall notify the Commissioner at least 24 hours in advance of: (1) each shutdown of any control equipment governed by this Order and (2) each shutdown of any process equipment governed by this Order if the process equipment shutdown will cause an increase in sulfur dioxide emissions. Notification can be made by calling (612) 296-7300. If the call is made outside of normal working hours (8-4:30),

the Company shall leave a recorded message. At the time of the notification, the Company shall provide the following information:

- a. Date and time of call.
- b. Company and facility name and location.
- c. Caller's name, title and telephone number.
- d. Date and time of shutdown.
- e. Equipment failure that caused the shutdown and reason for the equipment failure.
- f. Potential environmental impacts and what steps are or will be taken to address them.
- g. Estimated duration of shutdown.

The Company shall also notify the Commissioner when the shutdown is over.

2. Notification of Process or Control Equipment Breakdown. In accordance with Minn. Rules pt. 7005.1880 (1991), the Company shall notify the Commissioner immediately of (1) each breakdown of more than one hour duration of control equipment governed by this Order and (2) each breakdown of process equipment governed by this Order if the equipment breakdown causes an increase in the emissions of sulfur dioxide. Immediately shall mean as soon as is reasonably possible after giving consideration to plant and personnel safety. Notification can be made by calling (612) 296-7300. If the call is made outside of normal working hours (8-4:30) the Company shall leave a recorded message. At the time of the notification the Company shall provide the following information:

- a. Date and time of call.
- b. Company and facility name and location.
- c. Caller's name, title and telephone number.
- d. Date and time of breakdown.

- e. Equipment failure that caused the breakdown and reason for the equipment failure.
- f. Potential environmental impacts and what steps are or will be taken to address them.
- g. Estimated duration of breakdown.

The Company shall notify the MPCA Commissioner when the breakdown is over.

3. Duty to Minimize Adverse Impact on Air Quality. In the event of a shutdown or breakdown to which this part applies, the Company shall comply with Minn. Rules pt. 7005.1880, subp. 3, (1991), including the requirement to immediately take all practical steps to prevent or reduce any adverse impact on air quality that may result from the shutdown or breakdown. Immediately shall mean as soon as is reasonably possible after giving consideration to plant and personnel safety. In addition, the Commissioner of the MPCA may require feasible and practical modifications of the operation of the Facility to reduce emissions of sulfur dioxide during the period of the shutdown or breakdown. The Facility shall not be permitted to operate if the Facility experiences an unreasonable breakdown frequency of control equipment. Nothing in this Order shall permit the Facility to operate under conditions which may cause an immediate public health hazard.

4. Notification of Changes to be Made Pursuant to Part II of this Order. Pursuant to Part II of this Order, the Company may undertake certain changes to the Facility without obtaining a modification of this Order. If the Company does make such a change, and if the change in any way affects maximum allowable sulfur dioxide emissions or their dispersion, the Company shall notify the AQD Manager in writing at least 30 days prior to undertaking the change. The notification shall describe the change and why it does not require a modification of the Order. The Company must also obtain a permit amendment if required by state or federal law.

B. Annual Reports

The Company shall submit to the AQD Manger each calendar year, a report that contains the following information: a record of data used in calculating and calculations of the annual sulfur dioxide emission from each emission unit described in Part I of this Order; a record of each startup, shutdown, bypass and breakdown of process and sulfur dioxide control equipment; and a summary record of excess sulfur dioxide emissions, capacity limitation exceedances, sulfur content exceedances and fuel use limitation exceedances (or the Company shall state if no exceedances or noncompliance conditions occurred in the calendar year). Annual reports shall be postmarked within 30 days following the end of each calendar year.

C. Quarterly Reports

The Company shall submit reports each calendar quarter that provides the following information:

1. For each type of fuel oil used the percent sulfur content by weight and the heating value in million British Thermal Units per gallon;
2. The estimated maximum amount of fuel oil burned on an hourly basis using steam output and efficiency calculations at boiler No. 56-1 during the calendar quarter;
3. The total amount of residual fuel oil burned each day;
4. Summary of any exceedances of the emission limitation, capacity limitation, the sulfur content limitation and residual fuel oil use limitation during the calendar quarter. The Company shall provide an explanation of each exceedance which occurred, and if no exceedances occurred, the Company shall state that no exceedances occurred; and
5. Summary of any startups, shutdowns, bypasses, or breakdowns of process or control equipment during the calendar quarter.

The report shall be submitted by the 30th of the month following the monitored quarter. The Company shall state in its report if no fuel oil was burned during the monitored quarter.

VI. GENERAL CONDITIONS

A. Notwithstanding any other provision of this Order, the Company must obtain a modification of this Order before it commences construction, modification or operation of equipment at the Facility that: (1) is different than allowed by Part I of this Order and (2) could result in additional sulfur dioxide emissions or changes to sulfur dioxide emission patterns assumed in the modeling conducted to attain, maintain and verify AQCR 131's compliance with the NAAQS for sulfur dioxide.

B. The Company shall not apply for a modification of this Order, nor shall this Order be modified to allow the Company to construct any new major sulfur dioxide source or to make a "major modification" to any "major stationary source" at the Facility as those terms are defined in 40 CFR pt. 52.24 (1990), until after EPA has approved Minnesota's Offset Rule or its equivalent, or until the area has been redesignated as attainment.

C. This Order does not relieve the Company of the obligation, in undertaking all actions required by this Order, to comply with all applicable local, state and federal laws and regulations, including, but not limited to, federal new source performance standards, and laws and regulations related to occupational safety and health. In the event there is a conflict in applicable federal or state or local laws or regulations, the more stringent of the conflicting provisions apply.

D. This Order shall be binding upon the Company and its respective officers, employees, successors and assigns. The Company shall provide a copy of this Order to any successor in interest prior to transfer of that interest,

and shall simultaneously inform the MPCA that this notice has been given.

Should the Company sell or otherwise convey or assign any of its right, title or interest in the Facility, such conveyance shall not release the Company from any obligation imposed by this Order, unless the party to whom the right, title or interest has been transferred or assigned agrees in writing to fulfill the obligations of this Order and the MPCA finds and approves such transfer or assignment. The MPCA shall not disapprove a transfer or a assignment unless information demonstrates that the new owner lacks the ability to fulfill the obligations of this Order.

E. This Order mandates actions and establishes limits necessary for the Company to meet to attain, maintain and verify AQCR 131's compliance with the sulfur dioxide NAAQS. To the extent that any federal or state statute, rule, permit, Order, stipulation agreement, consent decree or schedule of compliance now in force or subsequently issued imposes limits and requires actions additional to or more stringent than those required in this Order, the Company shall comply with the more stringent requirements of the federal or state statute, rule, permit, Order, stipulation agreement, consent decree or schedule of compliance.

F. This Order is effective upon the date that it is signed by the MPCA Board Chair and by the Commissioner of the MPCA.

IT IS SO ORDERED BY THE MINNESOTA POLLUTION CONTROL AGENCY:

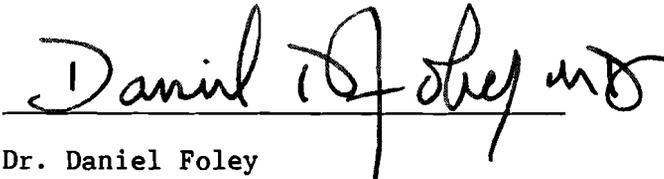


Charles W. Williams

Commissioner

Minnesota Pollution Control Agency

Date: 5/27/92



Dr. Daniel Foley

Chair

Minnesota Pollution Control Agency Board

Date: 5/27/92

EXHIBITS:

1. Facility Description

Exhibit 1

Emission Units and Pollution Control Equipment at Federal Hoffman, Incorporated. The emission units, air pollution control equipment and monitoring equipment at the Facility described in this Order include the following:

1.2.1 Emission Point No. 69 Facility I.D. 56-4 (Decommissioned)

Emission Unit - Type: Boiler
 Mfr.: Bros.
 Date of Installation: 1958
 Rated Heat Input: 48.5 MMBtu per Hour Input
 Fuel: Natural Gas, No. 6 Fuel Oil as Backup

Control Equipment - Type: None

Monitoring Equipment - Type: None

Stack Parameters - Height: 54 Feet
 Inside Exit Diameter: 3.5 Feet
 Flow Rate, acfm
 (for primary fuel): 24,825 @ 480 Degrees Fahrenheit

1.2.2 Emission Point No. 70 Facility I.D. 56-3 (Decommissioned)

Emission Unit - Type: Boiler
 Mfr.: Bros.
 Date of Installation: 1957
 Rated Heat Input: 48.5 MMBtu per Hour Input

Control Equipment - Type: None

Monitoring Equipment - Type: None

Stack Parameters - Height: 54 Feet
 Inside Exit Diameter: 3.4 Feet
 Flow Rate, acfm
 (for primary fuel): 24,825 @ 425 Degrees Fahrenheit

* Because the Facility has switched over to low pressure steam. Emission Points 69 and 70 can no longer be operated. They however will remain on site.

1.2.3 Emission Point No. 71 Facility I.D. 56-2

Emission Unit - Type: Boiler
 Mfr.: Wicks
 Date of Installation: 1965
 Rated Heat Input: 30 MM Btu per Hour Input (Derated)
 Fuel: Natural gas only

Control Equipment - Type: None
Monitoring Equipment - Type: None
Stack Parameters - Height: 54.0 Feet
Inside Exit Diameter: 3.5 Feet
Flow Rate, acfm
(for primary fuel): 23,100 @ 500 Degrees Fahrenheit

1.2.4 Emission Point No. 72 Facility I.D. 56-1

Emission Unit - Type: Boiler
Mfr.: Combustion Engineering
Date of Installation: 1974
Rated Heat Input: 33 MM Btu per Hour Input (Derated)
Fuel: Natural Gas, #6 Fuel Oil as Backup

Control Equipment - Type: None

Monitoring Equipment Type: Fuel Oil Flow Monitor

Stack Parameters - Height: 54 Feet
Inside Exit Diameter: 3 Feet
Flow Rate, acfm
(for primary fuel): 24,943 @ 520 Degrees Fahrenheit

1.2.5 Emission Point No. 82 Facility I.D. 55-3

Emission Unit - Type: Diesel Generator
Mfr.: Caterpillar
Date of Installation: 1975
Fuel: No. 2 Diesel Oil
Rated Horsepower: 105 KW
Unit Operation: Emergency Generator for Steam Plant

Control Equipment - Type: None

Monitoring Equipment - Type: None

Stack Parameters - Height: 8 Feet
Inside Exit Diameter: 0.4 Feet
Flow Rate, acfm
(for primary fuel): Unknown

1.2.6 Emission Point No. 83 Facility I.D. 167-1

Emission Unit - Type: Diesel Generator
Mfr.: Waukesha Emergency Generator
Date of Installation: 1976
Fuel: No. 2 Diesel Oil
Rated Horsepower: 350 KW
Unit Operation: Emergency Lighting and sewage pumps

Control Equipment - Type: None

Monitoring Equipment - Type: None

Stack Parameters - Height: 8 feet
Inside Exit Diameter: 0.4 Feet
Flow Rate, acfm
(for primary fuel): Unknown

1.2.7 Emission Point No. 84 Facility I.D. 169-1

Emission Unit - Type: Diesel Generator
Mfr.: Cummins Emergency Fire Pump
Date of Installation: 1976
Fuel: No.2 Diesel Fuel
Rated Horsepower: 255 KW
Unit Operation: Emergency Water Pump

Control Equipment - Type: None

Monitoring Equipment - Type: None

Stack Parameters - Height: 12 Feet
Inside Exit Diameter: 0.4 Feet
Flow Rate, acfm
(for primary fuel): Unknown