

May 14, 1998

(AR-18J)

Don Smith
Permit Unit II
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, Minnesota 55155

Dear Mr. Smith:

The United States Environmental Protection Agency (USEPA) has reviewed the DRAFT Air Emission Part 70 Permit No. 03700003-001 for Northern States Power (NSP) for the Black Dog facility located at 1400 Black Dog Road, Burnsville, Dakota County, Minnesota. The USEPA has comments concerning periodic monitoring with respect to particulate (PM) matter and opacity emission limits. These concerns have arisen in light of the periodic monitoring guidance being developed and out of concern for national consistency.

Periodic monitoring needs to be addressed for each particulate matter and opacity limit where there is not a performance testing requirement listed in the draft permit. This is the case for SV 001 and for most, if not all, of the coal and ash handling and storage facilities. Section 70.6(a)(3)(B) requires each Part 70 permit to contain periodic monitoring sufficient to yield reliable data from the relevant time period that are representative of the source's compliance with the permit, if the underlying applicable requirements do not otherwise specify such monitoring. This is a "gap-filling" provision to fill in any "holes" that allow the source to verify compliance with any or all applicable requirements. In order to meet this "gap-filling" provision, the periodic monitoring terms for each emission limit in the permit must include not only the appropriate method of monitoring, but also the minimum frequency at which the monitoring must be done in order to yield sufficient data to represent the source's

compliance with the permit. If the Part 70 permit's monitoring requirements do not specify frequency, the monitoring methods they institute can not be considered periodic.

The emission sources affected by this include SV 001, SV 006, EU 006, EU 007, EU 008, EU 011, EU 012, EU 013, EU 014, EU 015, EU 016, EU 017, EU 018, EU

019, and EU 021 for PM; EU 003, EU 004, EU 019, and EU 023 for opacity. (See enclosed policy on periodic monitoring for opacity emissions.) There are also a few fugitive emission sources that may need monitoring or record keeping because opacity and PM emission limits apply to these sources. The USEPA is also aware that some performance tests specified in the draft permit are one-time tests. These tests are on emission units 001, 003, 004, 024, and 025. The USEPA believes this is too infrequent to constitute periodic monitoring. The USEPA is submitting an attachment which lists conditions that can be useful for periodic monitoring for opacity. Periodic monitoring for PM can include, but is not limited to, stack testing using method 5 or any other test conducted at the source that will assure compliance with the limits in the permit. The frequency of monitoring should be at least twice during the permit term for low-emitting sources, and more frequent for higher emitting pollution sources. If an emission limit is monitored less frequently, the reasons for this should be given in the technical support document (TSD).

The TSD of the permit states that the MPCA utilities permit team has found that monitoring of control equipment parameters such as pressure drop across a baghouse or voltage and amperage of an electrostatic precipitator was environmentally insignificant when past emissions testing clearly shows that opacity, and not mass emissions, is the limiting parameter for PM-10 and the emission unit is continuously monitored for opacity with it's own dedicated opacity monitor. This method appears to be used for SV 001. However, this does not exempt the source from complying with its PM limit for SV 001, and the permit needs to specify how the source will demonstrate compliance with this applicable requirement.

The USEPA requests that the NSP part 70 permit be amended to address the above comments, and corrected before the permit reaches the proposed permit stage. We appreciate MPCA's consideration of our comments and efforts to improve periodic monitoring requirements in their Part 70 permits. Although this comment letter is specific to the NSP Black Dog facility, the periodic

monitoring concept should be addressed in all your Part 70 permits. We hope that the information outlined in this letter is useful to you, and we will continue to work with you to develop an acceptable, flexible permit. If you have any questions on this letter, please contact Shaheerah Fateen at (312) 353-4779.

Sincerely,

/s/

Robert Miller, Chief
Permits and Grants Section

Enclosures