

**AIR EMISSION PERMIT NO. 00300245- 001
Total Facility Operating Permit**

IS ISSUED TO

ELT Minneapolis LLC

RIVER ROAD INDUSTRIAL CENTER
4800-4898 East River Road
Fridley, Anoka County, MN 55421

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the Permit Applications Table.

This permit, Air Emission Permit No.00300245-001, authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Any additions or changes to conditions incorporated into Minnesota's State Implementation Plan (SIP) under 40 CFR § 52.1220, designated "Title I: SIP for sulfur dioxide (SO₂)" must go through the federal SIP approval process before becoming effective. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the SIP under 40 CFR § 52.1220, and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: State; Limits to Avoid Pt 70/Limits to Avoid NSR; Title I SIP Conditions (SO₂)

Operating Permit Issue Date: April 8, 2010

Expiration Date: Non-Expiring – All Title I Conditions do not expire.

Each new or revised condition designated Title I Condition: SIP for SO₂ is not effective or enforceable until approved by EPA as a SIP revision under Title I of the Clean Air Act.

Don Smith, P. E., Manager
Air Quality Permits Section
Industrial Division

for Paul Eger
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

Permit Type	Application Date	Permit Action
Total Facility Operating Permit	July 17, 2007 Revised: June 24, 2010	001

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Appendices:

Appendix I: Insignificant Activities and General Applicable Requirements

Appendix II: Title I Condition: SIP for Sulfur Dioxide (SO₂) Modeling Parameters Relied Upon to Demonstrate Compliance with NAAQS

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	651-296-6300
Outside Metro Area	1-800-657-3864
TTY	651-282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800, and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

ELT Minneapolis, LLC owns and operates boilers and emergency generators in the city of Fridley, which was part of the purchase agreement dated November 22, 2005, between BAE Systems Land and Armaments (formerly United Defense, LP), Inc and ELT Minneapolis, LLC (ELT). The company is a heat and steam distributor. The boilers and emergency generators were permitted under Air Emission Permit No. 00300020-001. The Minnesota Pollution Control Agency (MPCA) received their permit application on July 17, 2007. ELT did not submit any information that was claimed to be confidential verbally or in written correspondence.

This permit is a Joint Title I/Title V Federally Enforceable State Operating Permit, as it includes non-expiring Title I Conditions to implement the State Implementation Plan (SIP), pursuant to 40 CFR pt. 50, 40 CFR pt. 51, 40 CFR § 52.1220, Minn. R. 7007.0100, subp. 25B, and Minn. R. 7007.1050, subp. 4.

The facility is part of the SIP to reach attainment of SO₂ National Ambient Air Quality Standards (NAAQS) in Twin Cities 7-County Area. This permit will be resubmitted to EPA for inclusion into the SIP, and will replace United Defense, LP (formerly FMC/U.S.Navy) Air Emission Permit No. 00300020-001, which was State effective November 25, 2002, and EPA approved August 18, 2004, registered in the Federal Register No. 51181, as Title I Conditions only.

The main sources of potential emissions are SO₂ and nitrogen oxides (NO_x). The permit limits the emissions of the facility such that the facility is classified as a non-major source under federal Operating Program (40 CFR pt. 70) and non-major under federal New Source Review regulations (40 CFR § 52.21). The facility is an area source under federal National Emission Standards for Hazardous Air Pollutants (40 CFR pt. 63).

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: River Road Industrial Center
 Permit Number: 00300245 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:	Total Facility
What to do	Why to do it
SOURCE-SPECIFIC REQUIREMENTS	hdr
STATE IMPLEMENTATION PLAN (SIP) REQUIREMENTS	hdr
<p>ACTIVITIES NOT REQUIRING A MODIFICATION TO THE SIP: The Permittee is authorized to make changes to the facility without obtaining a modification to the SIP as long as the change does not do or result in any of the following:</p> <ol style="list-style-type: none"> 1. An exceedance of the limitations at which sulfur dioxide is emitted from any emission unit at the facility; 2. A physical change of the equipment that affects the stack parameters described in Appendix II; and 3. Any construction or modification of building structures greater than 56 feet above grade elevation if within 280 feet of Emission Units 1, 2 or 3. 	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
<p>ACTIVITIES REQUIRING A MODIFICATION TO THE SIP: Activities requiring a modification of the SIP prior to the Permittee commencing the activity include, but are not limited to, the following:</p> <ol style="list-style-type: none"> 1. Any decrease in the design and/or maximum stack gas volumetric flow rate below that contained in Appendix II; 2. Any decrease in the design and/or maximum stack gas exit temperature below that contained in Appendix II; 3. Any reduction in stack height below that contained in Appendix II; 4. Any increase in stack exit diameter above that contained in Appendix II; and 5. Any construction or modification of structures that increase the effective structural dimensions. 	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Construction and Operation of SIP Emission Unit: The Permittee may begin actual construction of a new emission unit or modification to existing emission unit upon permit issuance. However, the Permittee shall not operate any new emission unit or modified emission unit until any required SIP amendment is approved by US EPA.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
General Operating and Maintenance Requirements for the SIP: The owner or operator shall operate and maintain the process equipment described in Appendix II according to the parameters set forth in Appendix II. The parameters were used in the computer modeling performed to demonstrate that the SO2 maintenance area will attain compliance with the SO2 NAAQS.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Non-Permanent Records for SIP: The Permittee shall retain all records at the facility for a minimum of six years following the date of the required monitoring, sample, measurement, or report that corresponds with the SIP Title I Condition. All required documents, records, reports and plans in a form suitable for determination of the facility's compliance with the SIP by EPA or MPCA staff. The Permittee shall maintain the information at the facility in files which are easily accessible of inspections by EPA or MPCA staff, and are available for inspection.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Reporting: The Permittee may undertake certain changes to the facility without obtaining a modification to the SIP. However, if the Permittee does make a change, and if the change in any way affects SO2 emissions, the Permittee shall notify the Commissioner 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 to the SIP.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Annual Report for SIP: due 30 days after end of each calendar year following Permit Issuance to the Commissioner. The report shall contain the following information: a record of data used in calculating SO2 emissions, and calculations of the SO2 emissions; a record of each unscheduled startup, shutdown, and breakdown of process equipment; a summary record of excess SO2 emissions (or the Permittee shall state if no exceedances, and noncompliance conditions occurred in the calendar year).	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS; 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
TOTAL FACILITY EMISSION LIMITS AND RECORDKEEPING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: River Road Industrial Center

Permit Number: 00300245 - 001

Subject Item: GP 001 Boilers Subject to SIP and NSPS

Associated Items: EU 001 Boiler 1

EU 002 Boiler 2

EU 003 Boiler 3 (81098)

SV 001 Boiler 1

SV 002 Boiler 2 and 3

What to do	Why to do it
The limits below apply to each boiler separately listed in GP 001.	hdr
EMISSION LIMIT	hdr
OTHER LIMITS AND REQUIREMENTS	hdr
Sulfur Content of Fuel: less than or equal to 0.05 percent by weight of No. 2 fuel oil. (This limit is more stringent than the NSPS limit.)	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Fuel Supplier Certification: The Permittee shall obtain and maintain written fuel supplier certification from the fuel supplier for each shipment of distillate fuel oil delivered to the facility. Each fuel certification shall include the following information: the name of the fuel oil supplier; the sulfur content of the fuel oil; and method used to determine the sulfur content of the fuel oil.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Fuel Restriction: The Permittee is authorized to burn natural gas and distillate fuel oil only.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: River Road Industrial Center

Permit Number: 00300245 - 001

Subject Item: GP 002 Standby Generators

- Associated Items:** EU 005 Standby Generator-Sub 3(W)
 EU 006 Standby Generator-Sub 3(E)
 EU 007 Standby Generator-Sub 1
 EU 008 Standby Generator-Boiler
 SV 004 Cummins Standby Gen-Sub 3(W)
 SV 005 Cummins Standby Gen-Sub 3(E)
 SV 006 Caterpillar Standby Gen-Sub 1
 SV 007 Caterpillar Standby Gen-Boiler

What to do	Why to do it
The limits below apply to each boiler separately listed in GP 002.	hdr
EMISSION LIMITS	hdr
OTHER LIMITS AND REQUIREMENTS	hdr
Sulfur Content of Fuel: less than or equal to 0.05 percent by weight of diesel fuel.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Fuel Restriction: The Permittee is authorized to burn diesel fuel only.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 52, subp. Y; MN SIP
Fuel Supplier Certification: The Permittee shall obtain and maintain written fuel supplier certification from the fuel supplier for each shipment of diesel fuel oil delivered to the facility. Each fuel certification shall include the following information: the name of the fuel oil supplier; the sulfur content of the fuel oil and method used to determine the sulfur content of the fuel oil.	Title I Condition: State Implementation Plan (SIP) for SO2 NAAQS, 40 CFR pt. 50; 40 CFR pt. 51; 40 CFR pt. 5, subp. Y; MN SIP

APPENDIX II:
Facility Name: River Road Industrial Center
Permit Number: 00300245-001

Title I Condition: State Implementation Plan (SIP) for SO₂ National Ambient Air Quality Standards (NAAQS)
SO₂ Modeling Parameters Relied Upon to Demonstrate Compliance with NAAQS

Source Name	Emission Unit Number	SV ID	Stack Height (feet)	Stack Height (m)	Stack Dia. (feet)	Stack Dia. (m)	Stack Velocity (m/s)	Exit Temp (F)	Modeled and Maximum Heat Input (million Btu/hr)	Flow Rate at Top (ACFM)
Boiler 1	001	001	140	43	7.0	2.1	3.9	325	69.8	29,466
Boiler 2 & 3	002 003	002	140	43	8.5	2.4	1.8	325	69.8 & 35.1	19,677
Standby Generator-Sub 3(w) and 3(e)	005 006	004 005	36	11	0.59	0.18	58	440	2.96 2.96	3,100
Standby Generator – Sub 1	007	006	24	7.3	0.59	0.18	55	440	3.46	2,955
Standby Generator – Boiler and Bdg 37	008	007	29	8.8	0.49	0.15	48	440	2.1	1,793