



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

FEB 0 2018

Don Smith, Manager
Air Quality Permits Section
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

RE: Addendum to the 1997 Implementation Agreement for Air Quality
Construction/Operating Permits Program

Dear Mr. Smith:

Enclosed is a signed copy of an Addendum to the July 24, 1997 Implementation Agreement between the Minnesota Pollution Control Agency (MPCA) and the United States Environmental Protection Agency Region 5: Air Quality Construction/Operating Permits Program (Addendum).

Thank you for working on this addendum. We trust it will assist in MPCA's efforts to streamline the permit process while continuing to implement the air permits program. If you have any questions, please feel free to contact me at (312)886-4761 or Jennifer Darrow at (312) 886-6315.

Sincerely,

A handwritten signature in blue ink that reads "Genevieve Damico".

Genevieve Damico
Chief

Air Permits Section
Air and Radiation Division

**Addendum to 1997 Implementation Agreement Between the
Minnesota Pollution Control Agency and the United States
Environmental Protection Agency Region V:
Air Quality Construction/Operating Permits Program**

**Streamlining the Public Comment Period and EPA Review Period:
Part 70 Permit EPA Review Period Procedures**

The Minnesota Pollution Control Agency (MPCA) rules governing Environmental Protection Agency (EPA) Review and Objection are contained in Minn. R. 7007.0950. The United States Environmental Protection Agency (USEPA) Review Period is also described in Section 111.J.5-7 of the 1997 Implementation Agreement between the MPCA and the USEPA Region 5: Air Quality Construction/Operating Permits Program and a 2015 Addendum to the 1997 agreement.

This addendum to the 1997 Implementation Agreement fully replaces the 2015 Addendum and further establishes procedures to ensure streamlined public comment and EPA review periods for Part 70 permits. For each Part 70 Air Emissions Permit, the MPCA and USEPA agree to the following EPA Review Period procedures for draft and proposed Part 70 Air Emissions Permits.

Public Comment Period

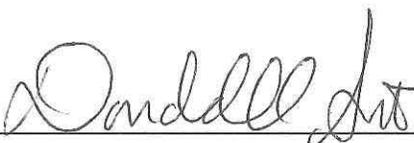
When a draft part 70 permit is prepared for public notice, the MPCA will provide a copy of the draft permit and technical support document (TSD) by email to Region 5 at the start of the public comment period.

EPA Review Period

At the end of the public comment period, the MPCA will provide a copy of the proposed permit and TSD by email to Region 5 to start the EPA Review Period. The EPA agrees to a reduced EPA review period as described under the following conditions.

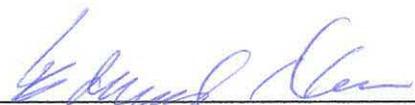
1. When there are no comments received by MPCA during the public comment period and there are no changes made to the permit, the EPA review period will end 15 days after the permit is proposed to Region 5.
2. When there are comments received by the MPCA during the public comment period and there are no changes made to the permit, the EPA review period will end 15 days after the permit is proposed to EPA. The MPCA will inform commenters in writing of the end date of the Part 70 petition period. The MPCA will include in the TSD for the proposed permit: the comments received, the MPCA response to comments, and a discussion of the timing for the Part 70 petition period. In the email/letter to EPA that initiates the EPA review period, MPCA will include the expected end date of the 60-day public petition period based on the end date of the EPA review period.

3. When there are comments received by MPCA and the permit is revised, the MPCA will determine whether a new public comment period is needed based on the types of changes to the permit. For example, if the changes are only administrative in nature, the MPCA will not conduct a new public comment period and the EPA review period will end 45 days after the permit is proposed to Region 5. If the MPCA decides to conduct a new public comment period, the MPCA will initiate the public comment period and follow the procedures as described above. If a new public comment period is not needed, the EPA review period will end 45 days after the permit is proposed to Region 5.
4. Where there are no comments received by the MPCA, but there are changes to the permit that are administrative in nature such that a new public comment period is not needed, the EPA review period will end 15 days after the permit is proposed to EPA. The MPCA will include in the TSD for the proposed permit a discussion of the changes that were made to the permit.
5. Notwithstanding paragraphs 1 through 4 above, Region 5 can request, within 10 days from the date of the proposed permit, and MPCA will grant, a review period that ends 45 days after MPCA proposes the permit to Region 5.



Date: 1/18/18

Don A. Smith, P.E., Manager
Air Quality Permits Section
Industrial Division
Minnesota Pollution Control Agency



Date: 2/1/18

Edward Nam
Director
Air and Radiation Division, Region V
U.S. Environmental Protection Agency