



Northern States Power Company

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October 16, 1996

Mr. Todd Biewen, Supervisor
Compliance Determination Unit
Compliance and Enforcement Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road
St. Paul, MN 55155-4194

Re: NSP Monticello Emission Point 1-B Compliance Plan

Dear Mr. Biewen:

This letter is in response to your Notice of Noncompliance (NON) dated September 25, 1996, and David Crowell's follow-up letter dated October 1, 1996, requiring NSP to submit a compliance plan relative to the failed NOx emission stack test on Diesel Generator #13 (Emission Point 1-B) at Northern States Power's (NSP) Monticello Facility. NSP hereby proposes to pursue Option B of the NON but without the retesting provision which would create unnecessary additional air emissions.

On September 24, 1996, NSP submitted a request for major permit amendment to Monticello's air permit #202W-92-OT-2 which proposes a higher NOx limit of 4.0 lb NOx/MMBtu and a lower operating limit of 105 hours/month in order to maintain potential NOx emissions below the level at which Prevention of Significant Deterioration (PSD) review is required (i.e. 40 tons/year). See *Attachment #1*.

NSP feels that it is reasonable and prudent to raise the permitted NOx concentration while simultaneously lowering the permitted operating hours, to achieve the same result of limiting the NOx emissions to less than 40 tons per year. The current permit allows annual operation of 1608 hours per year and NOx emissions of 38.8 tons of NOx per year from this generator; however, neither actual operating hours nor actual emissions have ever approached either limit.

As indicated on the Excess Emission Report forms in *Attachment #2*, this unit has only operated a total 22 hours in 1996. This is typical of the frequency of operation of this unit due to its backup or emergency purpose. In fact, 7 of those hours of operation in 1996 were necessary for no other reason than to conduct the stack tests. NSP feels that changing the operating limits would yield the same result as a retest without increasing actual air emissions.

In conclusion, NSP's formal compliance plan proposal for Emission Point 1-B includes the following proposed provisions:

1. NSP will work with MPCA to facilitate the timely issuance of a major amendment to the Monticello air permit to adjust the operating limits to realistic and achievable levels while insuring that PSD applicability is not triggered.
2. In the interim period before issuance of the permit amendment, NSP will continue to operate the unit only for emergency backup purposes and approximately 2 hours per month for routine testing to ensure its availability.

NSP does not propose to perform another NOx stack test on Emission Point 1-B until within 180 days after the issuance of the Title V Air Permit as required under MN Rules 7017.

Please also see the attached Certification Form signed by the Plant Manager (*Attachment #3*). If you have any questions or need any additional information concerning this proposed compliance plan please contact me at (612) 337-2287.

Sincerely,



David R. Welder
Environmental Analyst

Attachments (3)

c: Lee Eberley
Bill Zipp
Rick Karpinske
David Crowell - MPCA (Brainerd Office)