

August 18, 2022

Joshua Skelton – Chief Operating Officer
Minnesota Power
30 West Superior Street.
Duluth, MN 55802

RE: Letter of Warning - Minnesota Power - Hibbard Renewable Energy Center, Duluth, MN

Dear Joshua Skelton:

This is a Letter of Warning (LOW) issued by the Minnesota Pollution Control Agency (MPCA) to Minnesota Power for alleged violations of Air Emissions Permit No. 13700015-004, at the Regulated Party's Hibbard Renewable Energy Center located in Duluth, MN. The MPCA has sufficient information to allege that the Regulated Party has violated the following provisions of federal regulations, state statutes, rules, or permit conditions:

1. Air Emission Permit No. 13700015-004, Total Facility; Monitoring Equipment Calibration; Page A-4

Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment.
(Any requirements applying to continuous emission monitors are listed separately in this permit).

On August 1, 2022, MPCA staff conducted a routine air quality inspection at the Regulated Party's facility. At the time of the inspection the MPCA discovered that the Regulated Party had not calibrated the steam flow transmitter for boiler 4 (EU 004) in 2019.

2. Air Emission Permit No. 13700015-004, Boiler 3; Fuel usage limits; Page A-12

Fuel usage limits:

- 22 tons per hour for coal;
- 67 tons per hour for wood;
- 0.305 MMCF per hour for natural gas.

On August 1, 2022, MPCA staff conducted a routine air quality inspection at the Regulated Party's facility. At the time of the inspection the MPCA discovered that the Regulated Party had exceeded the hourly fuel usage limit for coal for boiler 3 (EU 003) on March 6, 2019, for three consecutive hours.

3. Air Emission Permit No. 13700015-004, Boiler 3; Fuel Sampling; Page A-12 and A-16

Fuel Sampling: The Permittee shall sample solid fuel as follows: 1) Daily composite sampling for wood fuel; and 2) sample one coal delivery each week according to the Permittee's sampling plans approved by the MPCA on November 18, 1987, (except the need for a duplicate gross 240 pound sample is not required).

On August 1, 2022, MPCA staff conducted a routine air inspection at the Regulated Party's facility. At the time of the inspection the MPCA discovered that the Regulated Party had not conducted the weekly fuel sampling for coal during the week of October 25-31, 2021.

To address the alleged violations cited in this LOW, the Regulated Party is to complete the following actions:

1. Within ten days after receipt of this LOW, submit a plan describing steps that were taken to ensure monitoring equipment calibrations and fuel sampling are not missed, and fuel usage limits are not exceeded in the future.

If you believe the allegations in this LOW are incorrect, please respond in writing within ten days after receiving this LOW and explain any inaccuracies. Please contact me by phone at (218) 302-6600 or by email at brenda.vaness@state.mn.us if you have any questions about the LOW.

Sincerely,

Brenda Vaness

This document has been electronically signed.

Brenda Vaness
Environmental Specialist
Industrial Division

BV:rc

cc: Cherese Hietala, Minnesota Power
Rachel Studanski, MPCA
Brent Rohne, MPCA
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