

AIR EMISSION PERMIT NO. 16300108-001

IS ISSUED TO

IMATION ENTERPRISES CORPORATION

Imation Enterprises Corporation
One Imation Place
Oakdale, Washington County, Minnesota 55128-3414

The emission units, control equipment, and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type:
Total Facility Operating Permit

Application Date:
December 3, 1996

This permit authorizes the Permittee to construct and 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 and with all general conditions listed in Minn. R. 7007.0800, subp. 16, which are incorporated by reference. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150-7007.1500. Terms used in the permit are as defined in the state air quality rules, unless the term is explicitly defined in the permit.

Permit Type: State; Synthetic Minor; Prevention of Significant Deterioration
New Source Review

Issue Date: March 18, 1997

Expiration: Permit does not expire
All Title I Conditions do not expire.

Michael J. Sandusky
Acting Division Manager
Air Quality Division

for Peder A. Larson
Commissioner
Minnesota Pollution Control Agency

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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	(612)296-6300
Outside Metro Area	1-800-657-3864
TTY	(612)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. Any requirements which have been determined not to apply are listed in Table A of this permit.

The permit shield, however, does not apply to: Minn. R. ch. 7030 (Noise Pollution Control).

FACILITY DESCRIPTION:

This permit authorizes the construction and operation of a new research and development and office complex. Several boilers, fired by diesel fuel or natural gas, and two back-up diesel generators support the operation of the facility. Chemicals containing Volatile Organic Compounds (VOCs) are used at the facility, and are tracked to ensure that emissions of VOCs and Hazardous Air Pollutants (HAPs) are below major source thresholds. To avoid major source classification for other pollutants, in addition to VOCs and HAPs, the permit contains limits on fuel use in the boilers and hours of operation for the generators.

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 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
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Operating and/or production limits will be placed on emission units based on operating conditions during compliance testing. Limits set as a result of a compliance test (conducted before or after permit issuance) apply until new operating/production limits are set following formal review of a performance test as specified by Minn. R. 7017.2025.	Minn. R. 7017.2025
Shutdowns: Notify the Commissioner at least 24 hours in advance of shutdown of any process or control equipment if the shutdown would cause an increase in the emission of air contaminants. At the time of notification, notify the Commissioner of the cause of the shutdown and the estimated duration. Notify the Commissioner again when the shutdown is over.	Minn. R. 7019.1000, subp. 1
Breakdowns: Notify the Commissioner immediately of a breakdown of more than one hour duration of any process or control equipment if the breakdown causes an increase in the emission of air contaminants. At the time of notification or as soon thereafter as possible, the permittee shall also notify the Commissioner of the cause of the breakdown and the estimated duration. Notify the Commissioner again when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Oral Notification of Deviations Endangering Human Health or the Environment: Within 24 hours of discovery, orally notify the Commissioner of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7007.0800, subp. 6(A)
Discovery of Deviations Endangering Human Health or the Environment Report (written): due two working days after discovery of deviation, submit a written description of any deviation endangering human health or the environment to the Commissioner. Include the following information in this written description: cause of the deviation; exact dates of the period of the deviation; if the deviation has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7007.0800, subp. 6(A)
Application for Permit Amendment: If you need a permit amendment, submit application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Emission Fees: due 60 days after receipt of an MPCA bill	Minn. R. 7002.0005 through Minn. R. 7002.0095
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises, to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Extension Requests: The permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 through 7030.0080

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
The permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp.16

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: GP 001 Boilers
Associated Items: EU 001 Boiler 303-1A
EU 002 Boiler 303-2A
EU 003 Boiler 303-3A
EU 004 Boiler 303-4A
EU 007 Boiler 01
EU 008 Boiler 303-5A

What to do	Why to do it
<p>Sulfur Dioxide: less than or equal to 98.0 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th of the following month. The emissions shall be calculated as follows: Monthly SO₂ Emissions = NG x 0.06 + Oil x S x 144 Where: "NG" is natural gas combusted during month in all boilers (million cubic feet); "Oil" is No. 2 fuel oil combusted during month in EU 001-004 (thousands of gallons); and "S" is the weighted average No. 2 fuel oil sulfur content in weight percent for No. 2 fuel oil combusted during month. The Permittee may use the NSPS limit of 0.5 weight percent sulfur for "S." During the first 12 months of operation, compliance shall be determined using the following equation: $N = 93.1 + (0.441) \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.</p>	<p>Title I Condition. Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000. Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200.</p>
<p>Nitrogen Oxides: less than or equal to 82.5 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th of the following month. The emissions shall be calculated as follows: Monthly NO_x Emissions = NG₁₄ x 140 + NG₇₈ x 100 + Oil x 25 Where: "NG₁₄" is natural gas combusted during month in EU 001-004 (million cubic feet); "NG₇₈" is natural gas combusted during month in EU 007-008 (million cubic feet); and "Oil" is No. 2 fuel oil combusted during month in EU 001-004 (thousands of gallons). During the first 12 months of operation, compliance shall be determined using the following equation: $N = 78.375 + (0.37125) \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.</p>	<p>Title I Condition. Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000. Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200.</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

Subject Item: GP 002 VOC/HAP Containing Material Tracking

Associated Items: EU 009 EU/SV for GP 002 VOC/HAP Containing Material Tracking

What to do	Why to do it
<p>VOC Usage: less than or equal to 96.0 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th of the following month. Monthly Volatile Organic Compound (VOC) usage shall be calculated by summing the total facility usage of each VOC containing material multiplied by the VOC content of the material. The 12 month rolling sum shall be calculated by totaling each of the monthly VOC usages for the previous 12 consecutive months. VOC usage may reflect the VOC content of waste as quantified according to this permit. During the first 12 months of operation, compliance shall be determined using the following equation: $N = 91.2 + (0.432) \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.</p>	<p>Title I Condition. Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000. Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200.</p>
<p>Single HAP Usage: less than or equal to 9 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th of the following month for each individual Hazardous Air Pollutant (HAP). Monthly single HAP usage shall be calculated by summing the total usage of each HAP containing material multiplied by the single HAP content of the material. The 12 month rolling sum shall be calculated by totaling each of the monthly single HAP usages for the previous 12 consecutive months. Single HAP usage may reflect the single HAP content of waste as quantified according to this permit. During the first 12 months of operation, compliance shall be determined using the following equation: $N = 8.55 + (0.0405) \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.</p>	<p>Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200, subp. 2, and 40 CFR Section 63.2.</p>
<p>Total HAP Usage: less than or equal to 24 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th day of the following month. Monthly total HAP usage shall be calculated by adding the monthly usage of each single HAP calculated for the month. The 12 month rolling sum shall be calculated by totaling each of the monthly total HAP usages for the previous 12 consecutive months. Total HAP usage may reflect the total HAP content of waste as quantified according to this permit. During the first 12 months of operation, compliance shall be determined using the following equation: $N = 22.8 + (0.108) \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.</p>	<p>Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200, and 40 CFR Section 63.2.</p>
<p>Records of all VOC and HAP containing materials used at the facility shall be maintained in a central location at the facility.</p>	<p>Title I Condition: Monitoring for limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200, subp. 2; and 40 CFR Section 63.2</p>
<p>Material Content: HAP and VOC content shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC and HAP content for demonstrating compliance with VOC and HAP emission limits. The Division Manager reserves the right to require the Permittee to take samples of the VOC and HAP containing materials and to conduct analysis of VOC and HAP content as per EPA reference methods for the purposes of compliance demonstration. If the EPA reference method is used, it shall supersede the MSDS.</p>	<p>Title I Condition: Monitoring for limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200, subp. 2; and 40 CFR Section 63.2</p>
<p>The Permittee may choose to track and record the VOC and HAP containing materials used at the facility which leave the facility as waste. These materials shall be stored in a central area. Each container of waste shall be accompanied by a breakdown of the composition of the waste obtained from MSDS sheets and a material balance if raw materials are mixed, or Imation waste stream profiles of the material. The breakdown or profile shall include the VOC content and the content of each HAP. The total VOC, Single HAP, and Total HAP leaving the facility as waste shall be calculated on a monthly basis by multiplying the quantity of each type of waste by the VOC and HAP content and summing the total. The total VOC, Single HAP, and Total HAP in waste may be subtracted from the monthly usage at the facility in demonstrating compliance with the monthly total VOC, Single HAP, and Total HAP usage limits.</p>	<p>Title I Condition: Monitoring for limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200, subp. 2; and 40 CFR Section 63.2</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: GP 003 Insignificant Kb Tanks

Associated Items: TK 001

What to do	Why to do it
Records: For each volatile organic liquid storage tank with a design capacity of greater than 40 cubic meters and less than 75 cubic meters (19,815 gallons), keep records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Retain records for the life of the tank. Any such tank must qualify as an insignificant activity under Minn. R. 7007.1300.	40 CFR Sections 60.116b(b) and 60.116b(a), and Minn. R. 7011.1520(C)

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

Subject Item: EU 001 Boiler 303-1A

Associated Items: GP 001 Boilers
 SV 001

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	40 CFR Section 60.42c(d) and Minn. R. 7011.0570
Compliance with the emission limits or the fuel oil sulfur limits to be determined based on a certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.42c(h) and Minn. R. 7011.0570
As the owner or operator seeks to demonstrate compliance with the SO ₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.44c(h) and Minn. R. 7011.0570
Fuel supplier certification shall include the following information for distillate oil: (i) The name of the oil supplier; and (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1) and Minn. R. 7011.0570
The quarterly reports shall include copies of the fuel supplier certifications described under 40 CFR Section 60.48c(f)(1). In addition, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.	40 CFR Section 60.48c(e)(11) and Minn. R. 7011.0570
Record and maintain records of the amounts of each fuel combusted during each calendar month by the 15th day of the following month and maintain records of manufacturer design information showing that the boiler is capable only of burning natural gas or diesel fuel.	40 CFR Section 60.13(i) to comply with 40 CFR Section 60.48c(g) and Minn. R. 7011.0570
Monitoring Equipment. The Permittee shall install and maintain fuel meters to continuously measure usage of each fuel at the boiler. All meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Opacity: less than or equal to 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity. This limit applies at all times except during periods of startup, shutdown or malfunction.	40 CFR Section 60.43c(c) and Minn. R. 7011.0570
Initial Performance Test: due 180 days after Initial Startup , but not to exceed 60 days after achieving the maximum production rate at which the affected facility will be operated, to determine compliance with the Opacity limit in 40 CFR Section 60.43c(c) and Minn. R. 7011.0570.	40 CFR Section 60.8 and Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

Subject Item: EU 002 Boiler 303-2A

Associated Items: GP 001 Boilers
 SV 002

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	40 CFR Section 60.42c(d) and Minn. R. 7011.0570
Compliance with the emission limits or the fuel oil sulfur limits to be determined based on a certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.42c(h) and Minn. R. 7011.0570
As the owner or operator seeks to demonstrate compliance with the SO ₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.44c(h) and Minn. R. 7011.0570
Fuel supplier certification shall include the following information for distillate oil: (i) The name of the oil supplier; and (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1) and Minn. R. 7011.0570
The quarterly reports shall include copies of the fuel supplier certifications described under 40 CFR Section 60.48c(f)(1). In addition, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.	40 CFR Section 60.48c(e)(11) and Minn. R. 7011.0570
Record and maintain records of the amounts of each fuel combusted during each calendar month by the 15th day of the following month and maintain records of manufacturer design information showing that the boiler is capable only of burning natural gas or diesel fuel.	40 CFR Section 60.13(i) to comply with 40 CFR Section 60.48c(g) and Minn. R. 7011.0570
Monitoring Equipment. The Permittee shall install and maintain fuel meters to continuously measure usage of each fuel at the boiler. All meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Opacity: less than or equal to 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity. This limit applies at all times except during periods of startup, shutdown or malfunction.	40 CFR Section 60.43c(c) and Minn. R. 7011.0570
Initial Performance Test: due 180 days after Initial Startup, but not to exceed 60 days after achieving the maximum production rate at which the affected facility will be operated, to determine compliance with the Opacity limit in 40 CFR Section 60.43c(c) and Minn. R. 7011.0570.	40 CFR Section 60.8 and Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

Subject Item: EU 003 Boiler 303-3A

Associated Items: GP 001 Boilers
 SV 003

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	40 CFR Section 60.42c(d) and Minn. R. 7011.0570
Compliance with the emission limits or the fuel oil sulfur limits to be determined based on a certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.42c(h) and Minn. R. 7011.0570
As the owner or operator seeks to demonstrate compliance with the SO ₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.44c(h) and Minn. R. 7011.0570
Fuel supplier certification shall include the following information for distillate oil: (i) The name of the oil supplier; and (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1) and Minn. R. 7011.0570
The quarterly reports shall include copies of the fuel supplier certifications described under 40 CFR Section 60.48c(f)(1). In addition, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.	40 CFR Section 60.48c(e)(11) and Minn. R. 7011.0570
Record and maintain records of the amounts of each fuel combusted during each calendar month by the 15th day of the following month and maintain records of manufacturer design information showing that the boiler is capable only of burning natural gas or diesel fuel.	40 CFR Section 60.13(i) to comply with 40 CFR Section 60.48c(g) and Minn. R. 7011.0570
Monitoring Equipment. The Permittee shall install and maintain fuel meters to continuously measure usage of each fuel at the boiler. All meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Opacity: less than or equal to 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity. This limit applies at all times except during periods of startup, shutdown or malfunction.	40 CFR Section 60.43c(c) and Minn. R. 7011.0570
Initial Performance Test: due 180 days after Initial Startup, but not to exceed 60 days after achieving the maximum production rate at which the affected facility will be operated, to determine compliance with the Opacity limit in 40 CFR Section 60.43c(c) and Minn. R. 7011.0570.	40 CFR Section 60.8 and Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

Subject Item: EU 004 Boiler 303-4A

Associated Items: GP 001 Boilers
 SV 004

What to do	Why to do it
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	40 CFR Section 60.42c(d) and Minn. R. 7011.0570
Compliance with the emission limits or the fuel oil sulfur limits to be determined based on a certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.42c(h) and Minn. R. 7011.0570
As the owner or operator seeks to demonstrate compliance with the SO ₂ standards based on fuel supplier certification, the performance test shall consist of the certification from the fuel supplier, as described under 40 CFR Section 60.48c(f)(1).	40 CFR Section 60.44c(h) and Minn. R. 7011.0570
Fuel supplier certification shall include the following information for distillate oil: (i) The name of the oil supplier; and (ii) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in 40 CFR Section 60.41c.	40 CFR Section 60.48c(f)(1) and Minn. R. 7011.0570
The quarterly reports shall include copies of the fuel supplier certifications described under 40 CFR Section 60.48c(f)(1). In addition, the quarterly report shall include a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.	40 CFR Section 60.48c(e)(11) and Minn. R. 7011.0570
Record and maintain records of the amounts of each fuel combusted during each calendar month by the 15th day of the following month and maintain records of manufacturer design information showing that the boiler is capable only of burning natural gas or diesel fuel.	40 CFR Section 60.13(i) to comply with 40 CFR Section 60.48c(g) and Minn. R. 7011.0570
Monitoring Equipment. The Permittee shall install and maintain fuel meters to continuously measure usage of each fuel at the boiler. All meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Opacity: less than or equal to 20 percent opacity except for one 6-minute period per hour of not more than 27 percent opacity. This limit applies at all times except during periods of startup, shutdown or malfunction.	40 CFR Section 60.43c(c) and Minn. R. 7011.0570
Initial Performance Test: due 180 days after Initial Startup, but not to exceed 60 days after achieving the maximum production rate at which the affected facility will be operated, to determine compliance with the Opacity limit in 40 CFR Section 60.43c(c) and Minn. R. 7011.0570.	40 CFR Section 60.8 and Minn. R. 7017.2020, subp. 1
Performance Test Pre-test Meeting: due 7 days before Initial Performance Test	Minn. R. 7017.2030, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: EU 005 Backup Generator - 01

Associated Items: SV 005

What to do	Why to do it
Operating Hours: less than or equal to 100 hours/year using 12 Month Rolling Sum determined each month by the 15th of the following month. Operating hours shall be determined using an hour run-time meter. During the first 12 months of operation, compliance shall be determined using the following equation: $N = 95 + 0.45 \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.	Title I Condition. Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000. Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200.
Opacity: less than or equal to 20 percent opacity except for a period of no more than ten consecutive seconds once operating temperatures have been obtained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 1.75 lbs/million BTU heat input	Minn. R. 7011.2300, subp. 2
Fuel Burned: diesel fuel only.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: EU 006 Backup Generator - 02

Associated Items: SV 006

What to do	Why to do it
Operating Hours: less than or equal to 100 hours/year using 12 Month Rolling Sum determined each month by the 15th of the following month. Operating hours shall be determined using an hour run-time meter. During the first 12 months of operation, compliance shall be determined using the following equation: $N = 95 + 0.45 \times (n-1)$ Where: "n" is the number of months in operation, and "N" is the rolling sum limit for the current month.	Title I Condition. Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000. Limit to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200.
Opacity: less than or equal to 20 percent opacity except for a period of no more than ten consecutive seconds once operating temperatures have been obtained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 1.75 lbs/million BTU heat input	Minn. R. 7011.2300, subp. 2
Fuel Burned: diesel fuel only.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: EU 007 Boiler 01

Associated Items: GP 001 Boilers
SV 007

What to do	Why to do it
Monitoring Equipment. The Permittee shall either install and maintain a fuel meter to measure the monthly natural gas usage at the boiler or calculate natural gas usage in EU-007 and EU-008 by subtracting the natural gas combusted in EU-001, EU-002, EU-003 and EU-004 from total natural gas usage at the facility and shall maintain records of the amount of natural gas burned in the boiler for each calendar month. If meters are installed, the meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0550
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2
Fuel Burned: natural gas only.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Subject Item: EU 008 Boiler 303-5A

Associated Items: GP 001 Boilers
SV 008

What to do	Why to do it
Monitoring Equipment. The Permittee shall either install and maintain a fuel meter to measure the monthly natural gas usage at the boiler or calculate natural gas usage in EU-007 and EU-008 by subtracting the natural gas combusted in EU-001, EU-002, EU-003 and EU-004 from total natural gas usage at the facility and shall maintain records of the amount of natural gas burned in the boiler for each calendar month. If meters are installed, the meters must be calibrated at least annually and a written record shall be kept of the results of the calibration.	Title I Condition. Monitoring for limit to avoid classification as a major source under 40 CFR Section 52.21; and to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0550
Opacity: less than or equal to 20 percent opacity except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2
Fuel Burned: natural gas only.	Minn. R. 7007.0800, subp. 2

TABLE B: SUBMITTALS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

Table B lists the submittals you must send to the Commissioner. Table B is divided into two sections, for source-specific submittal requirements and for submittals required of all permittees. Source-specific submittals are further organized as either one-time only or recurrent requirements. You may also be subject to additional reporting requirements contained in the compliance schedule located in Table C of this permit. All submittals must be postmarked or received by the date specified in the table, and certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Submittals which must be provided on standardized forms approved by the Commissioner are noted in Tables B and C.

Send any application for a permit or permit amendment to: Permit Information Coordinator, Permit Section, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4914. Also send the Permit Information Coordinator notices of: accumulated insignificant activities, installation of control equipment, replacement of an emissions unit, and changes that contravene a permit term.

Send all other submittals to: Compliance Tracking Coordinator, Compliance Determination Unit, Air Quality Division, Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

03/18/97

Facility Name: Imation Corp
 Permit Number: 16300108 - 001

What to send	When to send	Portion of Facility Affected
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup	EU001, EU002, EU003, EU004
Notification of the Anticipated Date of Initial Startup	due 30 days before Startup (but no greater than 60 days before such date).	EU001, EU002, EU003, EU004
Notification of the Date Construction Began	due 30 days after Start Of Construction	EU001, EU002, EU003, EU004
Notification	due 15 days after Initial Startup to be submitted with Notification of the Actual Date of Initial Startup. The notification shall include: the design heat input capacity and identification of fuels to be combusted; and the annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.	EU001, EU002, EU003, EU004
Notification	due 30 days after Initial Startup to include the information listed as To Be Determined (TBD) in the permit application (GI-04 stack/vent parameters, and GI-05B Part 1 manufacturers and model numbers).	Total Facility
Performance Test Notification (written)	due 30 days before Initial Performance Test	EU001, EU002, EU003, EU004
Performance Test Plan	due 30 days before Initial Performance Test	EU001, EU002, EU003, EU004
Performance Test Report - Microfiche Copy	due 105 days after Initial Performance Test	EU001, EU002, EU003, EU004
Performance Test Report	due 45 days after Initial Performance Test	EU001, EU002, EU003, EU004

TABLE B: RECURRENT SUBMITTALS

03/18/97

Facility Name: Imation Corp
Permit Number: 16300108 - 001

What to send	When to send	Portion of Facility Affected
Quarterly Report	due 30 days after end of each calendar quarter following Initial Performance Test . The report shall include information for EU001, EU002, EU003, and EU004. It shall contain the calendar dates covered in the reporting period and the information required by 40 CFR Section 60.48c(e)(11), including the fuel supplier certifications.	Total Facility
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Initial Startup The first report covers January 1 - June 30. The second report covers July 1 - December 31.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Initial Startup The report covers all deviations experienced during the calendar year.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner	Total Facility

TECHNICAL SUPPORT DOCUMENT
AIR EMISSION PERMIT NO. 16300108-001
Imation Enterprises Corporation
Oakdale Facility
AQD File No. 3772

This technical support document is for all the interested parties of the draft permit and to meet the requirements that have been set forth by federal regulations and Minn. R. (40 CFR, Section 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the draft permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 8731)
Imation Enterprises Corporation	Imation Enterprises Corporation
P.O. Box 64737	One Imation Place
St. Paul, Minnesota 55161-0897	Oakdale, Minnesota 55128-3414

1.2. Description Of The Permit Action

The permit is for the construction and operation of a new research and development and office complex. Several boilers, fired by diesel fuel and natural gas, and two back-up diesel generators will support the operation of the facility. Chemicals containing volatile organic compounds (VOCs) will be used at the facility and will be tracked to ensure that emissions of VOCs and hazardous air pollutants (HAPs) are below major source thresholds. To avoid major source classification for other pollutants, in addition to VOCs and HAPs, the permit contains limits on fuel use in the boilers and hours of operation on the generators. Thus, this is classified as a "synthetic minor" state permit. As such, additional environmental review because of air emissions was not required.

After a meeting on November 15, 1996, as well as a few subsequent phone calls, to discuss a range of permitting options and how they might interact with the need for environmental review, the Permittee submitted an application for a state individual total facility permit on December 3, 1996. Review work commenced on December 5, 1997 under the Expedited Permit Program upon receipt of pre-payment. The staff team working on overtime consisted of Jeff Peltola, Cary Hernandez, Duane Middendorf, and Yolanda Hernandez. A comment letter was sent to the Permittee on December 12, 1996, to request further input and clarification. The Permittee submitted the follow-up information by letter dated January 2, 1997. The draft permit was then faxed to the Permittee on January 10, 1997 (hard copy mailed January 14, 1997). The Permittee provided comments by letter dated January 21, 1997 with a follow-up letter dated January 30, 1997 (received on February 3, 1997). Several phone calls and miscellaneous faxes were exchanged during this period. Revised language contained in a CD-01 computer application form printout was faxed to the Permittee for final pre-public notice review on February 7, 1997 and Permittee gave go ahead February 10, 1997. [No comments were received.]

1.3. Emissions of the Facility

Emissions from the facility result primarily from two types of activities: combustion of diesel fuel and natural gas in boilers/back-up generators and use of chemicals mainly in laboratories. The permit contains limits on the amount of fuel that can be burned in the boilers and the amount of hours that the back-up generators can operate each year (12-month rolling sum basis). These two limits ensure that emissions of sulfur dioxide (SO₂) and nitrogen oxides (NO_x) remain below 100 tons per year (tpy). As mentioned, above, the permit also contains limits on the amount of chemicals that can be used at the facility which ensure emissions of VOCs, as well as individual HAPs and total HAPs, do not exceed 100 tpy, 10 tpy, and 25 tpy, respectively. Monitoring and recordkeeping is also required to demonstrate compliance with these limits.

The limiting equations for the boilers in the permit are derived from emission factors found in the AP-42 compendium, as reflected in the EC Forms of the permit application. The emissions summary form, GI-07 and the EC forms are included in the attachments to this technical support document.

Table 1. Total Facility Potential to Emit Summary and Attainment Status:

Pollutant	Potential to Emit (tons/year = tpy)	Attainment or Unclassified? (Yes or No)
Particulate Matter (PM)	10.1	Not Applicable
Particulate Matter less than 10 micron (PM ₁₀)	9.7	Yes
Sulfur Dioxide (SO ₂)	99	Yes
Nitrogen Oxides (NO _x)	99	Yes
Volatile Organic Compounds (VOCs)/Ozone	99	Yes
Carbon Monoxide (CO)	25.5	No
Individual Hazardous Air Pollutants (HAPs)	9	Not Applicable
Total HAPs	24	Not Applicable

Table 2. Facility Classification

Classification (put x in appropriate box)	Major	Synthetic Minor	Minor	N/A
Prevention of Significant Deterioration		X		
Non Attainment Area (for CO)		X		
Operating Permit Program		X		

2. Regulatory and/or Statutory Basis of Emission Limits and other Requirements

Table A: Limits and other Requirements

Total Facility (Pages A-1 and A-2)

These are general requirements that are found in all permits.

Factual and legal basis for above: As cited in the “Why to do it” column.

Comment: None.

Group 1 (GP 001) Boilers (Page A-3)

Fuel use limiting equations, including calculation and recording requirement, for SO₂ and NO_x.

Factual and legal basis for above: These are Title I Conditions; the legal basis is cited in the “Why to do it” column. These equations stem from the emissions calculations and were proposed by the Permittee in the January 2, 1997, follow-up submittal. The reason NO_x has two terms for natural gas is because the emission factors for NO_x are slightly different for the smaller boilers (EU 007 and 008), whereas they are the same in the case of SO₂. The term for “Oil” in the SO₂ equation reflects the option for the permittee to track the actual sulfur content of fuel rather than assuming it is at the 0.5 weight percent limit. The way of showing compliance during the first 12 months is patterned after that provided for registration permits in Minn. R. 7007.1110, subp. 7(D).

Group 2 (GP 002) VOC/HAP Containing Material Tracking (Page A-4)

Usage limitations, including calculation, recording, and monitoring requirements, for VOCs, individual HAPs and total HAPs.

Factual and legal basis for above: These are Title I Conditions (except specifically in the case of the individual HAPs and total HAPs limits); the legal basis is cited in the “Why to do it” column. The Permittee foresees using a variety of chemicals, primarily in the research and development laboratories. No specific emission units or stack/vents are indicated as the individual activities are insignificant activities and are emitted from a variety miscellaneous building vents. Even though an activity may be considered insignificant under Minn. R. 7007.1300, a requirement to track chemical usage (and thereby VOC and HAP emissions) is appropriate to ensure that the stationary source emits less than the major source amounts. Provisions are included to allow the Permittee the option of tracking the VOC and HAP content of material leaving the facility as waste. The VOC and HAP content of waste may be deducted from usage in demonstrating compliance with the usage limits. The limits were set such that there would be a 1 tpy cushion (reflecting combined GP 001 and GP 002 potential emissions in the VOC case) below the relevant thresholds to account for any small amounts that may be emitted from other insignificant sources.

Group 3 (GP 003) Insignificant Kb Tanks (Page A-5)

Recordkeeping requirement for small tanks which are not subject to any substantive requirement under the New Source Performance Standard found at 40 CFR pt. 60, subp. Kb to verify their size is below the applicability thresholds.

Factual and legal basis for above: As cited in the “Why to do it column” and mentioned above.

Comment: The Permittee may add additional tanks as long as they are insignificant activities and as long as they do not trigger any other Subpart Kb requirement or other requirement.

Emission Units EU 001-004 Boilers 303-1A through 303-4A (Pages A-5 through A-9)

(The requirements for these four boilers are listed on separate pages but they are all the same.)

Sulfur content of fuel less than or equal to 0.5 percent by weight

Factual or legal basis for above: These boilers are capable of burning diesel fuel (usually as backup) in addition to natural gas. Given that they are new, their size, and the fact that they are able to burn diesel,

they are subject to some substantive requirements under the New Source Performance Standard found at 40 CFR 60, subp. Dc (Small Industrial-Commercial-Institutional Steam Generating Units). This is one of them, as cited in the “Why to do it” column.

Compliance demonstration requirements for sulfur dioxide emissions standard (i.e., sulfur content in this case) include fuel supplier certification and what it shall include, quarterly reporting and daily recordkeeping of fuel burned.

Factual or legal basis for above: This is the compliance demonstration method option that the Permittee proposed (as provided by Subpart Dc) for the sulfur dioxide emissions standard. The Permittee is exercising the option of recording monthly the fuel use (as provided for in the 40 CFR Section 60.13(i) citation and a U.S. EPA memorandum dated February 20, 1992 for this type of boiler fired by natural gas and diesel). The legal basis is cited in the “Why to do it column.”

Monitoring Equipment (fuel meter)

Factual and legal basis for above: This is a Title I Condition, as cited in “Why to do it” column, as the means of measuring the amount of natural gas and diesel fuel. This is a Title I Condition because the NSPS does not specify a fuel meter, but for the purposes of clarity it is included here as a compliance demonstration requirement for the fuel-use-limitation Title I Condition found in GP 001 (all boilers).

Opacity (less than 20 percent with certain exceptions)

Factual and legal basis for above: This is a requirement of the Subp. Dc NSPS for these types of boilers burning these types of fuels.

Initial Performance Test due within 180 days of initial startup but no greater than 60 days after achieving maximum production (for the opacity limit).

Factual and legal basis for above: As required by the NSPS general provisions as referenced in the Dc NSPS at 40 CFR Section 60.45c(a).

Performance Test Pre-Test Meeting due seven days before initial performance test.

Factual and legal basis for above: As required in Minnesota performance test rules at Minn. R. 7017.2030, subp. 4.

Emission Units EU 005 and 006 Back-Up Generators 01 and 02 (Pages A-10 and A-11)

(The requirements for these two generators are listed on separate pages but they are all the same.)

Operating hours less than 100 hours per year (12 month rolling sum basis) determined using an hour run-time meter.

Factual and legal basis for above: This is the limit proposed by the Permittee for each back-up generator. It is listed as a Title I Condition since it is one of the several limitations assumed by the Permittee in order to avoid federal New Source Review regulations. The approach for the first 12 months is as described for GP 001.

Opacity less than 20 percent with the exception.

Factual and legal basis for above: The Minnesota standard for internal combustion engines under Minn. R. 7011.2300, subp. 1.

Sulfur dioxide less than or equal to 1.75 pounds per million Btu heat input.

Factual and legal basis for above: Minn. R. 7011.2300, subp. 2.

Comment: Compliance is essentially ensured as units are designed to burn diesel fuel which is only available with less than 0.5 weight percent sulfur in Minnesota. A change to enable the combustion of another fuel type would likely constitute a modification which would require the appropriate type of permit amendment.

Fuel burned: diesel fuel only

Factual and legal basis for above: Minn. R. 7007.0800, subp. 2. Though these generators are designed to burn only diesel fuel, this condition is included in the permit for clarification. The general, permit content, state rule citation is indicated as this is not a Title I Condition. A change enabling the combustion of a different/additional fuel, however, would likely constitute a modification which would require the appropriate type of permit amendment.

Emission Units EU 007 and 008 Boilers 01 and 303-5A (Pages A-12 and A-13)

(The requirements for these two boilers are listed on separate pages but they are all the same.)

Monitoring Equipment (fuel meter)

Factual and legal basis for above: This is a Title I Condition, as cited in “Why to do it” column, as the means of measuring the amount of natural gas and diesel fuel. This is a Title I Condition to clarify how compliance will be demonstrated for the fuel-use-limitation Title I Condition found in GP 001 (all boilers).

Total particulate matter less than 0.4 pounds per million Btu heat input.

Factual and legal basis for above: Minn. R. 7011.0550. These two boilers are too small to be subject to the Dc NSPS and so are subject to the state standard for indirect heating equipment.

Opacity less than or equal to 20 percent with exceptions.

Factual and legal basis for above: Minn. R. 7011.0515, subp. 2.

Fuel burned: natural gas only

Factual and legal basis for above: Minn. R. 7007.0800, subp. 2. Though these boilers are designed to burn only natural gas, this condition is included in the permit to clarify that EU 007 and 008 burn only natural gas (unlike the larger boilers, EU 001-004 which are capable of running on diesel fuel as a backup). The general, permit content, state citation is indicated as this is not a Title I Condition. A change enabling the combustion of a different/additional fuel, however, would likely constitute a modification which would require the appropriate type of permit amendment.

Table B: Submittals

One-Time Submittals or Notifications

Notification of the Actual Date of Initial Startup due 15 days after initial startup (EU 001-004).

Factual and legal basis for above: 40 CFR Section 60.7(a)(3) and Minn. R. 7019.0100. (For the NSPS boilers.)

Notification of the Anticipated Date of Initial Startup due 30 days (but no greater than 60 days) before startup (EU 001-004).

Factual and legal basis for above: 40 CFR Section 60.7(a)(2) and Minn. R. 7019.0100. (For the NSPS boilers.)

Notification of the Date Construction Began due 30 days after start of construction (EU 001-004).

Factual and legal basis for above: 40 CFR Section 60.7(a)(1) and Minn. R. 7019.0100. (For the NSPS boilers.)

Notification due 15 days after initial startup to be submitted with Notification of the Actual Date of Initial Startup (including the design capacity and fuels to be combusted (EU 001-004).

Factual and legal basis for above: 40 CFR Section 60.48c(a) and Minn. R. 7011.0570. (For the NSPS boilers.)

Notification due 30 days after initial startup to include the information listed as To Be Determined (TBD) in the permit application (GI-04 stack/vent parameters, and GI-05B Part 1 manufacturers and model numbers) (for the total facility).

Factual and legal basis for above: Minn. R. 7007.0800, subp. 2.

Comment: This is included to update the Delta computer data base with this specific information after the equipment is selected and installed.

Performance test notice, plan, and reports (EU 001-004).

Factual and legal basis for above: Various subpart citations in the state performance test rules, Minn. R. ch 7017. (For the NSPS boilers.)

Recurrent Submittals

Quarterly Report due 30 days after end of each calendar quarter following initial performance test for EU 001-004 containing the dates covered, the information required in 40 CFR Section 60.48c(e)(11), including the fuel supplier certifications. (Total facility)

Factual and legal basis for above: 40 CFR Section 60.48c(d) and Minn. R. 7011.0570. Though indicated as “Total Facility” in “Portion of Facility Affected” column, it relates specifically to the NSPS boilers.

Semiannual Deviations Report due 30 days after end of each calendar half-year. (Total Facility)

Factual and legal basis for above: All permitted facilities must do this per Minn. R. 7007.0800, subp. 6(A)

Comment: The onset of these reports is linked to initial startup so reports will not be done during the first calendar year after permit issuance if initial startup has not occurred. Strictly speaking, the initial startup referred to is that associated with the NSPS boilers (for which a notification is received). The intent of this link is to avoid receiving unnecessary reports. In deciding which event to use for the purposes of a streamlining link, it was assumed that the facility itself would not be operational without the prior initial startup of the main boilers.

Compliance Certification due 30 days after end of each calendar year. (Total Facility)

Factual and legal basis for above: All permitted facilities must do this per Minn. R. 7007.0800, subp. 6(C)(1)

Comment: As with semiannual deviations reports, linked to initial startup.

Emissions Inventory Report due 91 days after end of each calendar year following permit issuance (April 1).

To be submitted on a form approved by the Commissioner.

Factual and legal basis for above: All permitted facilities must do this per Minn. R. 7019.3000 through Minn. R. 7019.3010.

Comment: Emissions Inventory Reports will begin being due during the first year after permit issuance, regardless of whether commencement of construction or initial startup have occurred. If no emissions have occurred (nothing yet operated), the inventory will indicate that.

3. Conclusion

Based on the information provided by Imation Enterprises Corporation, the MPCA has reasonable assurance that the proposed construction and operation of the emission facility, as described in Air Emission Permit No. 16300108-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Attachments:

1. GI-07 Facility Emission Summary
2. EC forms for Emissions Calculations

Contact for further information:

Permit Engineer: Jeffrey Peltola
Telephone No.: (612) 282-2603