

AIR EMISSION PERMIT NO. 16300120- 005

IS ISSUED TO

Industrial Painting Specialist

INDUSTRIAL PAINTING SPECIALIST

5858 152nd Street North
Hugo, Washington County, MN 55038

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	Application Date	Issue Date	Permit Action
Total Facility Operating Permit	09/12/2003	09/14/2004	003
Moderate Amendment	12/12/2005	03/16/2006	004
Moderate Amendment	02/26/2008	See Below	005

This permit supersedes Permit No. 16300120-004 and authorizes the permittee to operate and construct 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. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: State; Limits to Avoid Pt 70/Limits to Avoid NSR

Authorization to Construct (40 CFR § 52.21) Issuance Date: April 10, 2008

Final Permit Issuance Date: July 7, 2008

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

Jeff J. Smith, Manager
Air Quality Permits Section
Industrial Division

for Brad Moore
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	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:

PER 001

PER 001 was an Option D Registration Permit authorizing operation of this metal coating job shop facility when it was previously located in Oakdale, Minnesota. This permit was voided July 22, 1999.

PER 002

PER 002 was an Option D Registration Permit authorizing operating of the facility at the current location in Hugo, Minnesota.

PER 003

PER 003 is a federally enforceable state operating permit for this facility located in Hugo, Minnesota. Limits on emissions of particulate matter, particulate matter smaller than 10 microns, volatile organic compounds, and hazardous air pollutants restrict emissions to less than major source levels.

The facility is a job shop for coating metal products. Metal products are cleaned in grit blast booths, spray coated with paint in spray booths, and then cured in ovens. Spray booth and grit blasting particulate matter emissions are controlled by panel filters and fabric filters, respectively. Combustion sources are limited to firing only natural gas and propane. This permit does not authorize any changes at the facility.

PER 004

This permit action authorized the construction of a new paint booth.

PER 005

This moderate amendment is to add a new paint booth (EU 012) to GP 001, to add a new make-up air unit (EU 014) and to add two new blast booths (EU 013 and EU 015). The paint booth can be added without a major amendment due to the PreCap language in the permit. The PTE of the facility was recalculated and several citations were updated.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

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
OPERATIONAL REQUIREMENTS	hdr
If the Permittee makes insignificant modifications described in Minn. R. 7007.1250 or adds insignificant activities listed in Minn. R. 7007.1300, the Permittee shall determine the potential emissions from those modifications on a ton per year basis, and verify that the permitted emissions from the total facility including the insignificant modifications and activities, do not exceed the major source threshold in 40 CFR Sections 52.21, 63.2, or 70.2.	Title I Condition: to avoid major source status under Sections 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid major source status under 40 CFR Section 70.2
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	40 CFR pt. 50; Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subps. 7A, 7L & 7M; Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
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
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subps. 14 and 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
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
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 enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
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

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p> <p>The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	<p>Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2</p>
<p>Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.</p>	<p>Minn. R. 7017.2025, subp. 3</p>
MONITORING REQUIREMENTS	hdr
<p>Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
RECORDKEEPING	hdr
<p>Recordkeeping: 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 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).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>
<p>Recordkeeping: 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.</p>	<p>Minn. R. 7007.0800, subp. 5(B)</p>
<p>When the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. For nonexpiring permits, these records shall be kept for a period of five years from the date that the change was made. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.</p>	<p>Minn. R. 7007.1200, subp. 4</p>
REPORTING/SUBMITTALS	hdr
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an 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
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)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. The Permittee shall submit this on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: GP 001 Indirect Heating Equipment**Associated Items:** EU 007 Large Air Makeup Unit

EU 008 Small Air Makeup Unit

EU 009 Office Heater 1

EU 010 Office Heater 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input for each emission unit in GP 001. The potential emission rate is 0.008 lb/mmBtu.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent except for one six-minute period per hour of not more than 60 percent opacity for each emission unit in GP 001.	Minn. R. 7011.0515, subp. 2
Permitted Fuels: restricted to Natural Gas and Propane.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: GP 002 Paint Booths**Associated Items:** CE 003 Mat or Panel Filter

CE 004 Mat or Panel Filter

CE 005 Mat or Panel Filter

EU 002 Big Paint Booth (SV 002 & SV 003/CE 003)

EU 005 Small Paint Booth (SV 005/CE 004)

EU 011 Paint Booth #3

EU 012 Paint Booth #4

What to do	Why to do it
LIMITS	hdr
<p>Particulate Matter < 10 micron: less than or equal to 90 tons/year using 12-month Rolling Sum calculated on a monthly basis by the last day of each month. This limit applies to all PM10 emissions from coating activities at the Facility.</p> <p>If the Permittee replaces, adds, or modifies any coating equipment, such equipment is subject to this permit limit as well as all of the requirements of GP 002. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. The Permittee is not required to repeat PM10 calculations described in Minn. R. 7007.1200, subp. 2.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping requirements in this permit.</p>	<p>Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid major source status under 40 CFR Section 70.2</p>
<p>Total Particulate Matter: less than or equal to 90 tons/year using 12-month Rolling Sum calculated on a monthly basis by the last day of each month. This limit applies to all PM emissions from coating activities at the Facility.</p> <p>If the Permittee replaces, adds, or modifies any coating equipment, such equipment is subject to this permit limit as well as all of the requirements of GP 002. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. The Permittee is not required to repeat PM calculations described in Minn. R. 7007.1200, subp. 2.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping requirements in this permit.</p>	<p>Title I Condition: to avoid major source status under 40 CFR Section 52.21</p>
<p>Volatile Organic Compounds: less than or equal to 90 tons/year using 12-month Rolling Sum calculated on a monthly basis by the last day of each month. This limit applies to all VOCs emissions from coating and coating-related activities (such as cleanup) at the Facility.</p> <p>If the Permittee replaces, adds, or modifies any coating equipment, such equipment is subject to this permit limit as well as all of the requirements of GP 002. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. The Permittee is not required to repeat VOC calculations described in Minn. R. 7007.1200, subp. 2.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping requirements in this permit.</p>	<p>Title I Condition: to avoid major source status under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid major source status under 40 CFR Section 70.2</p>
<p>HAP-Single: less than or equal to 9.0 tons/year using 12-month Rolling Sum calculated on a monthly basis by the last day of each month. This limit applies to all single HAP emissions from coating and coating-related activities (such as cleanup) at the Facility.</p> <p>If the Permittee replaces, adds, or modifies any coating equipment, such equipment is subject to this permit limit as well as all of the requirements of GP 002. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping requirements in this permit.</p>	<p>Title I Condition: to avoid major source status under 40 CFR Section 63.2; Minn. R. 7007.0800, subp. 2 to avoid major source status under 40 CFR Section 70.2</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

<p>HAPs - Total: less than or equal to 22.5 tons/year using 12-month Rolling Sum calculated on a monthly basis by the last day of each month. This limit applies to all total HAP emissions from coating and coating-related activities (such as cleanup) at the Facility.</p> <p>If the Permittee replaces, adds, or modifies any coating equipment, such equipment is subject to this permit limit as well as all of the requirements of GP 002. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping requirements in this permit.</p>	Title I Condition: to avoid major source status under 40 CFR Section 63.2; Minn. R. 7007.0800, subp. 2 to avoid major source status under 40 CFR Section 70.2
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies individually to each paint booth stack/vent.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity. This limit applies individually to each paint booth stack/vent.	Minn. R. 7011.0715, subp. 1(B)
CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain each spray booth panel filter system so that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 74 percent control efficiency	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain each spray booth panel filter system so that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 74 percent control efficiency	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain the panel filters any time that any spray booth that vents to the panel filters is in operation.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 14
Daily Inspections: Once each operating day, the Permittee shall visually inspect the condition of each panel filter with respect to alignment, saturation, tears, holes and any other condition that may affect the filter's performance. The Permittee shall maintain a daily written record of filter inspections.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 4 and 5
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the panel filter equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5, and 14
Corrective Actions: If the filters or any of their components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Operation and Maintenance of Filters: The Permittee shall operate and maintain each panel filter in accordance with the O & M Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Panel Filter Hood Certification and Evaluation: Each spray booth is not a total enclosure and therefore each spray booth panel filter system must conform to the hood requirements listed in Minn. R. 7011.0070, subp. 1. The Permittee shall certify this as specified in Minn. R. 7011.0070, subp. 3. The Permittee shall maintain a copy of the certification on site, as well as an annual record of fan rotation speed, fan power draw, or face velocity of each panel filter system, or other comparable air flow indication method.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Hood Evaluation: The Permittee shall measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method. The Permittee shall maintain a copy of the annual evaluation on site.	Minn. R. 7007.0800, subp. 4, 5, and 14
MONITORING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS
A-7

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

<p>Coating and Cleanup Material Content: VOC, HAPs, and Solids (PM and PM10) contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) or the Environmental Data Sheet (EDS) provided by the supplier for each material used. If a material content range is given on the MSDS or EDS, the highest number in the range shall be used in all compliance calculations. When using the MSDS/EDS as the basis for calculating particulate matter emissions, the assumption is made that PM consists entirely of PM10.</p> <p>Other alternative methods approved by the MPCA may be used to determine the VOC, HAPs, and solids contents. The Commissioner reserves the right to require the Permittee to determine the VOC, HAP, and solids contents of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede MSDS/EDS data.</p>	Minn. R. 7007.0800, subp. 4 and 5
RECORDKEEPING	hdr
<p>Daily Recordkeeping: The Permittee shall record and maintain a record of the quantity of each VOC, solids, and HAP containing material purchased for use at the facility. Material purchases shall be logged into the record on the date the material is purchased.</p>	Title I Condition: to avoid classification as a major source under 40 CFR Sections 52.21 and 63.2; Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR 70.2; Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Recordkeeping -- VOC Emissions</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <ol style="list-style-type: none"> 1) The total purchases of VOC containing materials for the previous calendar month using daily purchase records. This record shall also include the VOC content of each material as determined by the Material Content requirement of this permit. 2) The VOC emissions for the previous month using the formulas specified in this permit. 3) The 12 month rolling sum VOC emissions for the previous 12 month period by summing the monthly VOC emissions data for the previous 12 months. 	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Calculation -- VOC Emissions.</p> <p>The Permittee shall calculate VOC emissions using the following equations:</p> $\text{VOC (tons/month)} = V - W$ $V = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$ $W = (C1 \times D1) + (C2 \times D2) + C3 \times D3) + \dots$	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly VOC Emissions Calculation Continued:</p> <p>where:</p> <p>V = total VOC purchased in tons/month;</p> <p>A# = amount of each VOC containing material purchased, in tons/month;</p> <p>B# = weight percent VOC in A#, as a fraction;</p> <p>W = the amount of VOC shipped in waste, in tons/month;</p> <p>C# = amount, in tons/month, of each VOC containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero; and</p> <p>D# = weight percent of VOC in C#, as a fraction.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Recordkeeping -- HAP Emissions</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <ol style="list-style-type: none"> 1) The total HAP containing materials purchased in the previous calendar month using the daily purchase records. This record shall also include the individual and total HAP contents of each HAP containing material purchased in the previous month, as determined by the Material Content requirement of this permit. 2) The total and individual HAP emissions for the previous month using the formulas specified in this permit. 3) The 12 month rolling sum total and individual HAP emissions for the previous 12 month period by summing the monthly emissions data for the previous 12 months. 	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Calculation -- HAP Emissions. The Permittee shall calculate each individual HAP and total HAP emissions using the following equations:</p> $\text{HAP Emissions (tons/month)} = H - W$ $H = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$ $W = (C1 \times D1) + (C2 \times D2) + (C3 \times D3) + \dots$	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

<p>Monthly HAP Emissions Calculation Continued:</p> <p>Where: H = the amount of each pollutant (either total HAP or each individual HAP), purchased, in tons/month. A# = Amount of each HAP containing material purchased in the previous month, in tons/month. B# = weight percent of each individual or total HAP in A#, as a fraction (e.g., 50% is 0.50). W = the amount of each pollutant (either total HAP or each individual HAP) shipped in waste, in tons/month. C# = amount, in tons/month, of each HAP containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero. D# = weight percent of each individual or total HAP in C#, as a fraction.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Recordkeeping -- PM10 Emissions</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <p>1) The total purchase of each solids containing material for the previous calendar month using the daily purchase records. This record shall also include solids contents of each material as determined by the Material Content requirement of this permit. 2) The PM10 emissions for the previous month using the formulas specified in this permit. 3) The 12 month rolling sum PM10 emissions for the previous 12 month period by summing the monthly PM10 emissions data for the previous 12 months.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Calculation -- PM10 Emissions.</p> <p>The Permittee shall calculate PM10 emissions from the spray booths using the following equations:</p> <p>PM10 (tons/month) = $S(1-CE)(1-TE) - W$ $S = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$ $W = (C1 \times D1) + (C2 \times D2) + (C3 \times D3) + \dots$</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly PM10 Emissions Calculation Continued:</p> <p>Where: S = total solids purchased in tons/month; CE = overall control efficiency, as a fraction. This shall be 0.74 for all spray booths; TE = transfer efficiency, as a fraction. This shall be 0.30, unless otherwise approved by the MPCA in writing. A# = amount of each solids containing material purchased, in tons/month; B# = weight percent solids in A#, as a fraction; W = the amount of solids shipped in waste, in tons/month; C# = amount, in tons/month, of each solids containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero; and D# = weight percent of solids in C#, as a fraction.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Waste Credit: If the Permittee elects to obtain credit for HAPs, solids, and/or VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or total and individual HAP content for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, total HAP, and each individual HAP, excluding water. 2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC, solids, and total and individual HAP content of any of the materials.</p>	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: GP 003 Ovens**Associated Items:** EU 001 Big Oven (SV 001)

EU 004 Small Oven (SV 004)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent except for one six-minute period per hour of not more than 60 percent opacity for each emission unit in GP 001.	Minn. R. 7011.0610, subp. 1(A)(2)
Permitted Fuels: restricted to Natural Gas and Propane.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: GP 004 Blast Booths**Associated Items:** CE 001 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 003 Big Blast Booth (SV 006/CE 001)

EU 006 Small Blast Booth (SV 007/CE 002)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies individually to each blast booth stack/vent.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity. This limit applies individually to each blast booth stack/vent.	Minn. R. 7011.0715, subp. 1(B)
The Permittee shall operate and maintain each blast booth fabric filter so that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain each blast booth fabric filter so that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 74 percent control efficiency	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 14
Visible Emissions: The Permittee shall check each fabric filter vent for any visible emissions once each day of operation during daylight hours. If the daily visible emission check is not possible due to inclement weather, the Permittee shall read and record the pressure drop across the fabric filter when the blast booth is in operation instead of conducting a visible emission check.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 4 and 5
Pressure Drop: greater than or equal to 3 inches of water column and less than or equal to 6 inches of water column unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated. The Permittee shall record the pressure drop once each day of operation during blast booth operation if a visible emission check is not possible due to inclement weather.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 14
Recordkeeping of Visible Emissions and Pressure Drop. The Permittee shall record the time and date of each visible emission inspection and pressure drop reading as applicable, and whether or not any visible emissions were observed or the observed pressure drop was within the range specified in this permit	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 5
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter is in operation.	Title I Condition: to avoid classification as a major source under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 to avoid classification as a major source under 40 CFR Section 70.2; Minn. R. 7007.0800, subp. 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter in accordance with the O & M Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-11**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: EU 013 Blast Cabinet**Associated Items:** CE 007 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 008 High Efficiency Particulate Air Filter (HEPA)

SV 010 Doors and Windows

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)
CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain the control equipment CE 007 such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99.0 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A)
The Permittee shall operate and maintain the control equipment CE 007 such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 93 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as a major source under 40 CFR Section 70.2 and Minn. R. 7007.0200; Minn. R. 7011.0065, subp. 1(A)
Pressure Drop: greater than or equal to 2.0 inches of water column and less than or equal to 6.0 inches of water column for CE007, unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3 based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. The new range shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The range is final upon issuance of a permit amendment incorporating the change. The Permittee shall record the pressure drop at least once every 24 hours when in operation.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as a major source under 40 CFR Section 70.2 and Minn. R. 7007.0200; Minn. R. 7011.0080
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as a major source under 40 CFR Section 70.2 and Minn. R. 7007.0200; Minn. R. 7011.0080
The Permittee shall operate and maintain the control equipment CE 008 such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99.98 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A)
The Permittee shall operate and maintain the control equipment CE 008 such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99.98 percent control efficiency	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A)
The Permittee shall record the HEPA filter(s) condition at least once every 24 hours when in operation. The condition consists of the following including, but not limited to: alignment, saturation, and tears/holes.	Minn. R. 7011.0080
The control equipment is considered listed control equipment under Minn. R. 7011.0060 to 7011.0080. The Permittee shall operate and maintain the fabric filter (CE 007) and HEPA filter (CE 008) at all times that any process equipment controlled by the fabric filter and/or HEPA filter is operating. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: To avoid classification as a major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as a major source under 40 CFR Section 70.2 and Minn. R. 7007.0200; Minn. R. 7011.0075, subp. 1
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop (fabric filter) is outside the required operating range; or - the fabric filter or HEPA filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, eliminate visible emissions, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter or HEPA filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7011.0075, subp. 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Industrial Painting Specialist
Permit Number: 16300120 - 005

The Permittee shall maintain each piece of control equipment according to the manufacturer's specification, shall conduct inspections, and maintain documentation of those actions as required by Minn. R. 7011.0075, subp. 2(A) to 2(l).	Minn. R. 7011.0075, subp. 2
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TABLE A: LIMITS AND OTHER REQUIREMENTS**A-13**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: EU 014 Makeup Air Unit**Associated Items:** SV 009 Paint Booth, No. 4

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0610, subp. 1(A)(2)
Fuel Usage: Limited to Natural Gas and Propane.	Minn. R. 7007.0800, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14**

07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

Subject Item: EU 015 Glass Bead Booth**Associated Items:** CE 002 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

SV 007 Small Blast Booth Bleed Off

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent	Minn. R. 7011.0715, subp. 1(B)

TABLE B: SUBMITTALS

B-1 07/07/08

Facility Name: Industrial Painting Specialist
Permit Number: 16300120 - 005

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

TABLE B: RECURRENT SUBMITTALS**B-2** 07/07/08

Facility Name: Industrial Painting Specialist

Permit Number: 16300120 - 005

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 09/14/2004. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 09/14/2004 (for the previous calendar year). The Permittee shall submit this to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX A: Insignificant Activities

Facility Name:Industrial Painting Specialist

Permit Number: 16300120-005

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(H)	Miscellaneous: 3. brazing, soldering or welding equipment; <ul style="list-style-type: none">• Facility operates soldering and welding equipment	Minn. R. 7011.0710/0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 16300120-005

This technical support document (TSD) is intended for all parties interested in the draft/proposed permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 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 determination to issue the draft/proposed permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 3479)
Industrial Painting Specialists 5858 152 nd Street North Hugo, Minnesota 55038	5858 152nd Street North Hugo Washington County
Contact: Gary Papermaster Phone: 651-407-8000	

1.2. Description of the Facility

This facility is a metal painting job shop. Metal products are blast cleaned, painted in a spray booth, and cured in an oven. Emissions from the two paint booths are controlled by panel filters and emissions from the two blast booths are controlled by baghouses. Combustion emission unit fuels are limited to natural gas and propane.

1.3 Description of the Activities Allowed by this Permit Action

This moderate amendment is to add a new paint booth (EU 012) to GP 001, to add a new make-up air unit (EU 014) and to add two new blast booths (EU 013 and EU 015). The paint booth can be added without a major amendment due to the PreCap language in the permit. The PTE of the facility was recalculated and several citations were updated. Moderate amendments to State Operating Permits do not require a 30 day public notice period.

1.4. Facility Emissions:

Table 1. Non-Title I Emissions Increase Summary

Pollutant	After Change (lb/hr)	Before Change (lb/hr)	Net Change (lb/hr)	Insignificant Modification Thresholds (lb/hr <)	Minor and Moderate Amendment Thresholds (lb/hr < or ≥)	Type of Amendment (Minor or Moderate)
PM ₁₀	46.01	0	32.39	0.855	3.42	Moderate
NO _x	0.950	0	0.950	2.28	9.13	Insignificant
SO ₂	0.003	0	0.003	2.28	9.13	Insignificant
CO	0.397	0	0.397	5.70	22.80	Insignificant
VOC	98.90	0	0.00	2.28	9.13	Moderate
Lead	0.00	0	0.00	0.025	0.11	Insignificant

Table 2. Total Facility Potential to Emit Summary

	PM (tpy)	PM10 (tpy)	SO2 (tpy)	NOx (tpy)	VOC (tpy)	CO (tpy)	Single HAP (tpy)	Total HAPs (tpy)
Increase in PTE From Amendment	0.37	0.44	0.01	3.23	0.12	1.69	0.00	0.00
Total Facility Limited PTE	90.91	91.09	0.05	13.82	90.38	7.22	9.15	22.66
Total Facility Actual Emissions (2006)	7.48	7.48	0.00	0.43	28.63	0.35	HAPs not reported in emission inventory	

Table 3. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		PM, PM ₁₀ , VOC	SO ₂ , NO _x , CO, Pb
Part 70 Permit Program		PM ₁₀ , VOC	SO ₂ , NO _x , CO
Part 63 NESHAP		single and total HAPs	

2. Regulatory and/or Statutory Basis

New Source Review

This facility is a non-major source for NSR and will remain a non-major source due to permit limits and requirements.

Part 70 Permit Program

This facility is a non-major source for part 70 and will continue to remain a non-major source due to permit limits and requirements.

New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the operations at this facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

This facility is a non-major source for HAP and has accepted limits on HAP usage to avoid major source status under 40 CFR pt. 63. The facility has also stated that no area source standards apply.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment
- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment

Table 4. Regulatory Overview of Units Affected by the Modification/Permit Amendment

EU, GP, or SV	Applicable Regulations	Comments:
EU 012	GP 002	EU 012 is a paint booth that was added to the existing GP 002. The PM/PM10 limit of 90 tpy was not changed.
EU 013	Minn. R. 7011.0715 Minn. R. 7011.0065 Minn. R. 7011.0080	EU 013 is a blast cabinet that is subject to IPER. It is controlled by a baghouse and a HEPA filter, which are both subject to the control equipment rule.
EU 014	Minn. R. 7011.0610, subps. 1(A) (1 & 2) Minn. R. 7007.0800, subp. 2	EU 014 is a make-up air unit subject to the Direct Heating Rule and is limited to Natural Gas and Propane for fuel.
EU 015	Minn. R. 7011.0715	EU 015 is a blast cabinet that is subject to IPER.

3. Technical Information

3.1 Calculations of Potential to Emit

Calculations of Potential to Emit can be found in Appendix 1 to this document.

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 5 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 5. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
GP 002			CE 005 is a new panel filter that is subject to the existing monitoring and recordkeeping requirements of GP 002.
EU 013	Title I Condition Minn. R. 7007.0200 Minn. R. 7007.3000 Minn. R. 7007.0065 Minn. R. 7011.0080	Pressure Drop reading once every 24 hours Condition check of HEPA Filter once every 24 hours	The pressure drop and condition checks are required by the control equipment rule to ensure proper operation of the control equipment and to meet the control efficiency requirements for the facility to remain a minor source.

3.3 Insignificant Activities

Industrial Painting Specialist has several operations which are classified as insignificant activities. These are listed in Appendix A to the permit.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements.

4. Conclusion

Based on the information provided by Industrial Painting Specialist, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 16300120-005, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Chris Buntjer (permit writer/engineer)
 Christian Norman (enforcement)
 Shanda Fisher (stack testing)
 Peggy Bartz (peer reviewer)

AQ File No. 3918; DQ 1927

Attachments: 1. PTE Summary and Emissions Increase Calculation Spreadsheets
 2. Facility Description and CD-01 Forms