

**AIR EMISSION PERMIT NO. 00300142- 001
IS ISSUED TO**

Mayline Group

Kwik - File LLC
490 Northco Drive
Fridley, Anoka County, Minnesota 55432

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
Total Facility Operating Permit	April 6, 1995

This permit authorizes the Permittee to 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 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: State ; Syn Minn Part 70
Issue Date: August 26, 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
Acting Commissioner
Minnesota Pollution Control Agency

HJ:yma

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Table C: Compliance Schedule

Appendices: Attached and Referenced in Table A

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 rule 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. 70007.1800, 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:

The stationary source is a mailroom furniture manufacturing facility. Raw materials used in the production include sheet metals, plastic laminates, particle boards, and paints. With respect to the National Ambient Air Quality Standards, the facility is located in a nonattainment area for Carbon Monoxide (CO), and attainment or unclassifiable for all other air pollutants.

For Part 70 permitting purposes, the facility is a true minor source for Sulfur Dioxide (SO₂), Nitrogen Oxides (NO_x), and CO, and a minor source with permit limits to restrict emissions (synthetic minor source) of Volatile Organic Compounds (VOC), Hazardous Air Pollutants (HAP), and Particulate Matter (PM) and Particulate Matter less than 10 um in size (PM₁₀). These permit limits can only be changed through a major permit amendment procedure (Minn. R. 7007.1500, subp. 1).

Two electrostatic spray paint booths are subject to federal New Source Performance Standards (NSPS), subpart. LL, "Surface coating of metal furniture." As part of the corrective actions to the failure of notifying the initial startup of these NSPS affected facilities, the Permittee is required to submit written notification to the MPCA within 30 days after the date this permit is issued.

State air quality requirements include the control equipment rule (Minn. R. 7011.0075), the industrial process equipment rule (Minn. R. 7011.0715), and the indirect heating equipment rule (Minn. R. 7011.0510).

Compliance with the permit limits for VOC and HAP include calculations of monthly material usage's and a cumulative monthly usage called 12-month rolling sum, as defined in Minn. R. 7007.0100, subp. 28. The Permittee is allowed to use existing records of material usage to calculate the 12-month rolling sum for the first 12 months after this permit is issued.

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 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
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.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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, or as required by Minn. R. 7019.1000 as amended after permit issuance. 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
Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
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.	Minn. R. 7007.0800, subp. 4(D)
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
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
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
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

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)
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)
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)
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 - 7030.0080
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

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: GP 001 Paint Booths**Associated Items:** EU 001 PB-1A

EU 002 PB-1B

EU 003 PB-2

EU 004 PB-3

EU 009 F-1 Cleaning Area

What to do	Why to do it
VOC Usage: less than or equal to 76.0 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. During the first 12 months of permit issuance, existing records shall be used to calculate the VOC usage.	Title I condition: Limit to avoid classification as a major source under 40 CFR 52.21; and to avoid major classification under 40 CFR 70.2; Minn. R. 7007.0100, subp. 25(C)
Single HAP Usage: less than or equal to 9.5 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 facility usage of each HAP containing material multiplied by the 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. During the first 12 months of permit issuance, existing records shall be used to calculate the single HAP usage.	Limit to avoid major source classification under 40 CFR 70.2, 40 CFR 63.2, and Minn. R. 7007.0200, subp. 2
Total HAP Usage: less than or equal to 24.5 tons/year using 12 Month Rolling Sum calculated and recorded each month by the 15th 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. During the first 12 months of permit issuance, existing records shall be used to calculate the total HAP usage.	Limit to avoid major source classification under 40 CFR 70.2, 40 CFR 63.2, and Minn. R. 7007.0200, subp. 2
Material Content: VOC and HAP 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 supercede the MSDS.	Title I condition: Monitoring for limit to avoid classification as a major source under 40 CFR 52.21; and to avoid major source classification under 40 CFR 70.2, 40 CFR 63.2, and Minn. R. 7007.0200, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: SV 001**Associated Items:** EU 001 PB-1A

EU 002 PB-1B

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 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 opacity	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: SV 002**Associated Items:** EU 003 PB-2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 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 opacity	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: SV 003**Associated Items:** EU 004 PB-3

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 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 opacity	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: SV 004**Associated Items:** EU 005 O-1 Bake Oven

EU 006 O-1 Dry-off Oven

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0510, subp. 1
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. 7011.0510, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: EU 001 PB-1A**Associated Items:** CE 001 Mat or Panel Filter

GP 001 Paint Booths

SV 001

What to do	Why to do it
The volume (liter of coating solids applied) weighted average mass (kg) of Volatile Organic Compounds: less than or equal to 0.9 kilograms/liter	40 CFR 60.312; Minn. R. 7011.2550
Initial Performance Test: due 180 days after Initial Startup	40 CFR 60.315(a); Minn. R. 7011.2550
Performance tests & compliance: Initial and subsequent, monthly calculations, which are considered performance tests, shall be performed to demonstrate compliance with the limit of 0.9 kg of VOC/liter of coating solids applied. (Only the VOC containing materials used at this unit shall be used in the compliance demonstration.)	40 CFR 60.313; Minn. R. 7011.2550

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: EU 002 PB-1B**Associated Items:** CE 001 Mat or Panel Filter

GP 001 Paint Booths

SV 001

What to do	Why to do it
The volume (liter of coating solids applied) weighted average mass (kg) of Volatile Organic Compounds: less than or equal to 0.9 kilograms/liter	40 CFR 60.312; Minn. R. 7011.2550
Initial Performance Test: due 180 days after Initial Startup	40 CFR 60.315(a); Minn. R. 7011.2550
Performance tests & compliance: Initial and subsequent, monthly calculations, which are considered performance tests, shall be performed to demonstrate compliance with the limit of 0.9 kg of VOC/liter of coating solids applied. (Only the VOC containing materials used at this unit shall be used in the compliance demonstration.)	40 CFR 60.313; Minn. R. 7011.2550

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: CE 001 Mat or Panel Filter**Associated Items:** EU 001 PB-1A

EU 002 PB-1B

What to do	Why to do it
Operation, maintenance, and deviation reporting of the air pollution control equipment shall be done in accordance with Minn. R. 7011.0075.	Title I condition to avoid NSR; 40 CFR 52.21; Minn. R. 7007.0100, subp. 25(C); Minn. R. 7011.0075
Monitoring and record keeping: inspect condition of the filters including, but not limited to, alignment, saturation, tears, and holes; record filter condition and any corrective actions taken every 24 hours if in operation.	Minn. R. 7011.0080

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: CE 002 Mat or Panel Filter**Associated Items:** EU 003 PB-2

What to do	Why to do it
Operation, maintenance, and deviation reporting of the air pollution control equipment shall be done in accordance with Minn. R. 7011.0075.	Title I condition to avoid NSR; 40 CFR 52.21; Minn. R. 7007.0100, subp. 25(C); Minn. R. 7011.0075
Monitoring and record keeping: inspect condition of the filters including, but not limited to, alignment, saturation, tears, and holes; record filter condition and any corrective actions taken every 24 hours if in operation.	Minn. R. 7011.0080

TABLE A: LIMITS AND OTHER REQUIREMENTS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Subject Item: CE 003 Mat or Panel Filter**Associated Items:** EU 004 PB-3

What to do	Why to do it
Operation, maintenance, and deviation reporting of the air pollution control equipment shall be done in accordance with Minn. R. 7011.0075.	Title I condition to avoid NSR; 40 CFR 52.21; Minn. R. 7007.0100, subp. 25(C); Minn. R. 7011.0075
Monitoring and record keeping: inspect condition of the filters including, but not limited to, alignment, saturation, tears, and holes; record filter condition and any corrective actions taken every 24 hours if in operation.	Minn. R. 7011.0080

TABLE B: SUBMITTALS

08/26/97

Facility Name: Kwik - File LLC
Permit Number: 00300142 - 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

08/26/97

Facility Name: Kwik - File LLC
Permit Number: 00300142 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup	EU001, EU002

TABLE B: RECURRENT SUBMITTALS

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

What to send	When to send	Portion of Facility Affected
Deviations Report	due 30 days after end of each calendar quarter following Permit Issuance in which the volume weighted mass of VOC limit was exceeded. If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.	EU001, EU002
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner.	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance	Total Facility

TABLE C: COMPLIANCE SCHEDULE

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Table C contains the compliance schedule as required by Minn. R. 7007.0500, subp. 2 (K). You must complete the actions required in Table C by the dates listed in the table. 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.

Citation	Corrective Action	When to complete the action
40 CFR 60.315(a); Minn. R. 7011.2550	Performance Test Report	due 30 days after Permit Issuance . The report shall consist of the calculated VOC usage for the unit over the previous 12 months, ending in the month that the permit is issued.
40 CFR 60.7(a)(3); Minn. R. 7011.0050	Notification of the Actual Date of Initial Startup	due 30 days after Permit Issuance

TABLE C: COMPLIANCE SCHEDULE

08/26/97

Facility Name: Kwik - File LLC

Permit Number: 00300142 - 001

Citation	Corrective Action	When to complete the action
40 CFR 60.315(a); Minn. R. 7011.2550	Performance Test Report	due 30 days after Permit Issuance . The report shall consist of the calculated VOC usage for the unit over the previous 12 months, ending in the month that the permit is issued.
40 CFR 60.7(a)(3); Minn. R. 7011.0050	Notification of the Actual Date of Initial Startup	due 30 days after Permit Issuance

**TECHNICAL SUPPORT DOCUMENT
FOR
AIR EMISSION PERMIT NO. 00300142-001**

This Technical Support Document (TSD) is for all the interested parties of the permit and to meet the requirements that have been set forth by the federal regulations and Minnesota Rules, 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 preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 2542)
Kwik-File, LLC	Kwik-File, LLC
490 Northco Drive	490 Northco Drive
Fridley, Minnesota 55432	Fridley, Minnesota 55432

1.2. Description of the Permit Action

As an existing source, the facility has not had any air emission permit. The permit application was received on April 6, 1995, (deadline: April 15, 1995); revising submittals were also received on December 7, 1995, (ownership change), April 10, 1996, (changes in CD-02, CD-03, NSPS, subp. EE requirements, etc.), and July 29, 1996, (NSPS, subp. EE calculation with a spreadsheet file in a diskette). The application is administratively complete before and technically complete on July 29, 1996.

1.3. Emissions of the Facility

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

Pollutant	Potential to Emit (Tons/year)	Attainment or Unclassified?
Particulate Matter (PM)	92.83*	Not Applied
Particulate Matter < 10 µm (PM ₁₀)	92.83*	Yes
Sulfur Dioxide (SO ₂)	0.0174	Yes
Nitrogen Oxides (NO _x)	4.64	Yes
Volatile Organic Compounds (VOC)/O ₃	76.2	Yes
Carbon Monoxide (CO)	0.629	No
Lead (Pb)	Not Applied	Yes
Hazardous Air Pollutants: Single/Total	9.5/24.5	Not Applied

* The control efficiency of panel filters is changed to 73.6 percent (80 percent capture, to correct for a partial enclosure; 92 percent collection, as per Minn. R. 7011.0080) from 98 percent as submitted in the permit application, so that performance test can be avoided.

Table 2. Facility Classification

Classification	Major	Synthetic Minor	Minor
Prevention of Significant Deterioration		PM, PM ₁₀ , VOC	SO ₂ , NO _x , CO
Non Attainment Area (list pollutant)			
Operating Permit Program		PM, PM ₁₀ , VOC	SO ₂ , NO _x , CO
Title III (Hazardous Air Pollutants)		HAPS: Single & total	

2. Regulatory and/or Statutory Basis of Emission Limit

Summary of Emission Limit and Regulatory and/or Statutory Basis of the Emission Limit.

- a. Emission Unit I.D.: 1 and 2 (Electrostatic Paint Guns); both are connected to Stack/Vent 1. Emission Limit and/or Special Conditions: 0.9 kg of VOC/liter of solids applied. Factual and legal basis for above: NSPS, Subp. EE (40 CFR 60.312). Comments: Compliance will be determined from the volume weighted mass of VOC consumption calculated based on monthly records. Actual data for 1993, which might have included those of non-NSPS emission units, shows that 0.8 kg of VOC/liter of solids was used at this facility. To demonstrate compliance with the NSPS limit, however, the facility is required by this permit to use only the paints and solvents used in the NSPS affected units in the calculations. EU 1 & 2 become “affected facilities” under NSPS, because of their installation date (May 1981; applicable date: 11/28/1980).
- b. Group I.D.: 1 (Paint Booths & Parts Cleaning); Stack/Vent I.D.: 1, 2, 3, and 7; Emission Unit I.D.: 1 & 2 (Electrostatic), 3 (Conventional), 4 (Conventional), and 9 (Cleaning). Emission Limit and/or Special Conditions: **Title I conditions** -- 76 ton VOC/year; and limits of 9.5 ton Single HAP/year and 24.5 ton HAPS/year to avoid major source classification under 40 CFR § 70.2 and Minn. R. 7007.0200, subp. 2, and 40 CFR § 63.2. These VOC and HAP limits will be calculated based on a 12-month rolling sum basis as defined in Minn. R. 7007.0100, subp. 28.

Factual and legal basis for above: Permittee requested in the permit application to avoid being a major source for PSD (40 CFR § 52.21) and Part 70 (40 CFR pt. 70) because of VOC emissions, and for Title III of the 1990, Clean Air Act Amendments because of HAP emissions. Title I condition is defined in Minn. R. 7007.0100, subp. 25(C). Comments: Combustion in the emission units outside of this group (EU 5, 6, 7, and 8) contributes to the facility emissions with a small additional amount of VOC and a negligible additional amount of HAPS. No limit or pollution control equipment is required for any of these emission units. As of July 9, 1997, there is no NESHAP or MACT standards promulgated that is applied to this facility.

- c. Control Equipment I.D.: 1, 2, and 3.
Emission Limit and/or Special Conditions: **Title I condition**--Requirements for panel filters.
Factual and legal basis for above: Minn. R. 7011.0075 (Control equipment requirements).
Comments: The use of the pollution control equipment, not an essential part of the process operation in this case, is needed to greatly reduce the potential to emit PM and PM₁₀. The operation of the pollution control equipment is made federally enforceable, so that the control effect can be included in the PTE calculation.
- d. Stack/Vent I.D.: 1, 2, and 3; Emission Unit I.D.: 1 & 2, 3, and 4.
Emission Limit and/or Special Conditions: Tables 1 and 2 limits and 20 percent opacity limit.
Factual and legal basis for above: Minn. R. 7011.0715 (Industrial process equipment).
Comments: Because the Permittee made use of the control equipment rules, the performance testing requirements (notification, pre-test meeting, test plan, reports, etc.) are not listed for the stacks.
- e. Stack/Vent I.D.: 4; Emission Unit I.D.: 5 & 6.
Emission Limit and/or Special Conditions: 0.4 lb/MMBtu for PM; 20 percent opacity with detailed exceptions.
Factual and legal basis for above: Minn. R. 7011.0510 (Indirect Heating Equipment).
Comments: Two ovens of the same rated heat input, 1.2 MMBtu/hr, are used for drying.

3. Separating VOC limit and HAP limits

Proposing separate VOC limit and HAP limits, as did by the Permittee, is a good approach for compliance assurance. We can appreciate this approach more by looking at the following analysis.

Given Group 1 VOC limit of 76 ton/year, if we insist in using maximum HAP content to derive the corresponding potential usage of HAPS, we will have 34.72 ton HAPS/year. See Attachment 1 for details.

The facility's 1993, records show consumption of VOC and HAPS to be 22.78 tons and 7.54 tons, respectively. If we use these and Group 1's VOC limit of 76 ton/year, we will have 25.16 ton HAPS/year.

If the consumption trend of VOC and HAPS continues, the Permittee will probably meet the VOC limit (76 ton/year) and HAP limits (9.5 ton/year for single HAP; 24.5 ton/year for total) for Group 1, with the HAP limits being the determining limits. However, as the Permittee pursues process improvement, the HAPS/VOC ratio of 1993, will probably be changed; thus, explicitly separated VOC and HAP limits are the best in allowing production flexibility and in compliance assurance.

4. Conclusion

Based on the information provided by Kwik-File, LLC, the MPCA has reasonable assurance that the operation of the emission facility, as described in the Air Emission Permit No. 00300142-001 and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

5. Public Notice

This permit was public noticed from July 25, 1997 through August 22, 1997. The U.S. Environmental Protection Agency (EPA) was asked to review during the same period. No comment was received from either the public or the EPA for this permit. Final permit issuance was initiated on August 25, 1997.

Attachments:

1. PTE calculations, EMS_CALC.XLS.
(Actual emission data appearing in this file were directly from the permit application. They were not checked and thus were not entered to DELTA.)

Need further information?

Permit Engineer: Hongming Jiang, Ph.D., P.E.
Telephone Number: (612)296-7670.