

AIR EMISSION PERMIT NO. 05300443-002

IS ISSUED TO

Minnesota Diversified Products, Inc.

Minnesota Diversified Products, Inc.
9091 County Road 50
Rockford, Hennepin County, MN 55373

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	Action Number
Total Facility Operating Permit	06/14/1995	03/04/2002	001
Moderate Amendment	07/02/2004	See below	002

This permit 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 through 7007.1500. Terms used in the permit are defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Part 70/Limits to Avoid New Source Review

Issue Date: November 4, 2004

Expiration: March 4, 2007

Title I Conditions do not expire.

Richard J. Sandberg
Air Quality Permits Section Manager
Industrial Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

RJS/MC:lh

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Table C: Compliance Schedule - Not used in this permit

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	(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:

Minnesota Diversified Products, Inc. (MDP) manufactures rigid polystyrene boardstock by both foam extrusion and the expandable polystyrene (EPS) bead process. The EPS process results in emissions of pentane and combustion products from the boilers used to produce steam for the process. The extrusion process results in emissions of methyl chloride, HCFC 142b, and HCFC 22 which are used as blowing agents. MDP also fabricates pre-manufactured urethane, fabricates and repairs equipment in a machine shop, and laminates other products onto foam products with hot-melt glues. The facility is currently operating with a Title V permit that restricts emissions to less than the major source level under NSR, but allows major source level HAP emissions.

ACTION 002

Permit action 002 is a moderate amendment authorizing installation and operation of a peaking electric generator. The generator is a 1000 horsepower 750 kilowatts Caterpillar engine subject to the maximum achievable control standard for reciprocating internal combustion engines at 40 CFR Part 63, Subp. ZZZZ.

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

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
This permit establishes limits on the facility to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Equipment Labeling and Inventory: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number shall be affixed by placard, stencil, or other similar means, and shall be maintained so that they are readable and visible at all times from a safe distance. The Permittee shall maintain a written list of all emissions units on site. The list shall correlate the units to the numbers used in this permit (EU and GP) and shall include the data from Appendix II of this permit. The Permittee shall update the list to include any new, replaced, or modified equipment prior to making the pre-authorized change.	Minn. R. 7007.0800, subp. 2
STANDARD REQUIREMENTS	hdr
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 shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment 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 the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
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)Monitoring
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
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. 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.	Minn. R. 7019.1000, subp. 3
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

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

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
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
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)
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
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)
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.	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 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)
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
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
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)
Emission 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.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
The Permittee must submit a Risk Management Plan (RMP) under 40 CFR pt. 68. Each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, shall design and implement an accidental release prevention program. An initial RMP must be submitted no later than the latest of the following dates: 1) June 21, 1999; 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or 3) The date on which a regulated substance is first present above a threshold quantity in a process. A full update and resubmission of the RMP is required at least once every five years. The five-year anniversary date is reset whenever your facility fully updates and resubmits their RMP. Submit RMPs to the Risk Management Plan Reporting Center, P.O. Box 1515, Lanham-Seabrook, Maryland 20703-1515. RMP information may be obtained at http://www.epa.gov/swercepp or by calling 1-800-424-9346.	40 CFR pt. 68

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

The facility currently uses ozone-depleting substances as defined in 40 CFR pt. 82. Sections 601-618 of the 1990 Clean Air Act Amendments and 40 CFR pt. 82 may apply to your facility. Read Sections 601-618 and 40 CFR pt. 82 to determine all the requirements that apply to your facility.	40 CFR pt. 82
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TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: GP 001 Total Facility VOC Limits

Associated Items: EU 001 Dingeldein Pre-Expander
EU 002 25" Block Mold
EU 003 31" Block Mold
EU 004 Tri-904 Pre-Expander (to be removed)
EU 005 Custom Shape Mold (205)
EU 006 Custom Shape Mold (206)
EU 007 48" Extruder
EU 008 24" Extruder
EU 011 Pre-Expander (new)
EU 012 Shape Mold Press (Proposed)
EU 013 24" Laminator
EU 015 New Shape Molder 1 (projected)
EU 016 New Shape Molder 2 (projected)

What to do	Why to do it
LIMITS	hdr
Volatile Organic Compounds: less than or equal to 40,000 lbs/month using 12-month Rolling Average to be calculated by the 15th day of each month for the previous 12-month period as described later in this permit. All emission units included in GP 001 as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001.	Title I Condition: Limit to avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
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. This applies separately to each emissions unit. None of these processes are expected to generate any particulate matter.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This applies separately to each emissions unit.	Minn. R. 7011.0715, subp. 1(B)
MONITORING	hdr
Daily Recordkeeping. For VOC used in the EPS bead and extruded foam processes: On each day of operation, the Permittee shall maintain production records showing the amount of each VOC-containing material used. This shall be based on written usage logs and meter readings. For other VOC-containing materials: The Permittee shall caculate, maintain, and record monthly usage showing the quantity of each material used. This shall be based on either written usage logs or purchase/delivery records.	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; Minn. R. 7007.0800. subp. 4 and 5
Monthly Recordkeeping -- VOC Emissions. By the 15th day of the month, the Permittee shall calculate and record the following: 1) The total usage of VOC-containing materials for the previous calendar month using the daily and monthly usage records. This record shall also include the VOC and contents of each material as determined by the Material Content requirement of this permit. 2) The VOC emissions, in pounds, for the previous month using the formula specified in this permit. 3) The 12-month rolling average VOC emissions for the previous 12-month period by summing the monthly VOC emissions data for the previous 12 months and dividing by 12.	Minn. R. 7007.0800, subp. 4 and 5
Monthly Calculation -- VOC Emissions. The Permittee shall calculate the Monthly Emissions Rate of VOC (MER) using the following equation: MER (lbs/month) = (A1 x B1) + (A2 x B2) + (A3 + B3) where: A# = amount of each VOC-containing material used (e.g., EPS bead, adhesive, etc.), in pounds/month; B# = weight percent VOC in A#, as a fraction.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

<p>Material Content of EPS Bead: The Permittee shall use the Certificate of Analysis (COA) provided by the supplier to determine the VOC content of each shipment. If a COA is not available, the Permittee shall use 7% for the VOC content. However, if in the preceeding 12 months, EPS bead with a content greater than 7% was used, then the Permittee shall assume that the VOC content is equivalent to the highest VOC content used in the preceeding 12 months.</p> <p>Other alternative methods approved by the MPCA may be used to determine the VOC contents. The Commissioner reserves the right to require the Permittee to determine the VOC 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 the MSDS.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>Material Content of Other Materials: VOC contents in other materials 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 contents. The Commissioner reserves the right to require the Permittee to determine the VOC 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 the MSDS.</p>	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc
Permit Number: 05300443 - 002

Subject Item: GP 002 New Equipment
Associated Items: EU 011 Pre-Expander (new)
EU 015 New Shape Molder 1 (projected)
EU 016 New Shape Molder 2 (projected)

What to do	Why to do it
The Permittee is authorized to install and operate EUs 011, 015 and 016 at any time during the life of this permit. The units shall meet all the requirements of this permit (e.g., GP 001).	Title I Condition: Limit to avoid classification of changes as major modifications under 40 CFR Section 52.21 and Minn. R. 7007.3000

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: GP 003 VOC Units Other Than Extrusion

Associated Items: EU 001 Dingeldein Pre-Expander
EU 002 25" Block Mold
EU 003 31" Block Mold
EU 004 Tri-904 Pre-Expander (to be removed)
EU 005 Custom Shape Mold (205)
EU 006 Custom Shape Mold (206)
EU 011 Pre-Expander (new)
EU 012 Shape Mold Press (Proposed)
EU 013 24" Laminator
EU 015 New Shape Molder 1 (projected)
EU 016 New Shape Molder 2 (projected)

What to do	Why to do it
<p>The Permittee may replace units listed in GP 003 with units of equivalent or lesser capacity, may modify listed units in GP 003 so long as they remain at equivalent or lesser capacity, or move existing emission units, provided that VOC emissions are tracked and calculated as specified in this permit under GP 001, and other permit conditions are met.</p> <p>If a proposed change triggers an applicable requirement that is not contained in this permit (e.g., 40 CFR pt. 63), the change must go through the appropriate procedure in Minn. R. ch. 7007.</p>	<p>Title I Condition: Limit to avoid classification of changes as major modifications under 40 CFR Section 52.21 and Minn. R. 7007.3000</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: EU 009 Boiler 1**Associated Items:** SV 008 Boiler 1 Vent (207)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . The potential to emit based on equipment design and allowable fuels is 0.014 lb/MMBtu.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input . The potential to emit based on equipment design and allowable fuels is 0.51 lb/MMBtu.	Minn. R. 7011.0515, subp. 1
Distillate Oil, Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	Minn. R. 7007.0800, subp. 2
Fuel Type: Natural Gas or No. 2 Fuel Oil only, by design.	Minn. R. 7005.0100, subp. 35a
Fuel Records: 1). The Permittee shall keep records of fuel purchases for the Facility on a monthly basis. 2). The Permittee shall obtain and maintain a certification from the fuel supplier for each fuel oil delivery specifying the sulfur content of the fuel oil, in percent by weight.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: EU 010 Boiler 2**Associated Items:** SV 009 Boiler 2 Vent (208)

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . The potential to emit based on equipment design and allowable fuels is 0.014 lb/MMBtu.	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input . The potential to emit based on equipment design and allowable fuels is 0.51 lb/MMBtu.	Minn. R. 7011.0510, subp. 1
Distillate Oil, Sulfur Content of Fuel: less than or equal to 0.5 percent by weight	Minn. R. 7007.0800, subp. 2
Fuel Type: Natural Gas or No. 2 Fuel Oil only, by design.	Minn. R. 7005.0100, subp. 35a
Fuel Records: 1). The Permittee shall keep records of fuel purchases for the Facility on a monthly basis. 2). The Permittee shall obtain and maintain a certification from the fuel supplier for each fuel oil delivery specifying the sulfur content of the fuel oil, in percent by weight.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: EU 014 Hot Wire Cutting Tables**Associated Items:** SV 012 Hot Wire Cutters

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. This applies separately to each piece of industrial process equipment.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity . This applies separately to each piece of industrial process equipment.	Minn. R. 7011.0715, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

Subject Item: EU 017 Caterpillar 3412 Diesel Generator 750 KW; 1000 hp**Associated Items:** CE 001 Oxidation Catalyst

SV 015 Peaking Generator

What to do	Why to do it
EU 017 is a new compression ignition reciprocating internal combustion engine subject to 40 CFR Part 63, Subpart ZZZZ.	hdr
Some of the applicable general provision requirements from title 40 Part 63, Subpart A are included here for reference. The Permittee shall refer to Table 8 in Subp. ZZZZ, for a complete list of applicable general requirements in Subp. A of title 40 Part 63.	
LIMITS	hdr
Opacity: greater than or equal to 20 percent once operating temperatures have been attained.	Minn. R. 7011.2300, subp. 1
Sulfur Dioxide: less than or equal to 0.5 lbs/million Btu heat input	Minn. R. 7011.2300, subp. 2
Carbon Monoxide: greater than or equal to 70 percent reduction on a 4-hour rolling average basis. This limit applies at all times except during periods of startup, shutdown, and malfunction.	40 CFR Sections 63.6600(b) and 63.6605(a); 40 CFR part 63, subp. ZZZZ Table 2a
PERFORMANCE TESTING REQUIREMENTS	hdr
Initial Performance Test: due 180 days after Initial Startup of EU 017. Testing shall be conducted to determine percent CO reduction according to the requirements of Table 4 in part 63, Subp. ZZZZ, and 40 CFR Section 63.6620.	40 CFR Sections 63.6610(a), 63.6620, and 63.6630(b); Minn. R. 7017.2020, subp. 1
Initial compliance shall be demonstrated according to Subp. ZZZZ, Table 5 item 1. During this initial performance test, the Permittee shall measure the catalyst pressure drop to establish the catalyst pressure drop operating limitation according to Section 63.6630(b) and Subp. ZZZZ Table 2b.	
Performance Test: due 182 days after Initial Performance Test of EU 017. The first subsequent performance test is due one half-year after the initial performance test. Subsequent semiannual testing shall be conducted to determine CO reduction according to the requirements of Tables 3 and 4 in Subp. ZZZZ, and 40 CFR Section 60.6620.	40 CFR Sections 63.6615, 63.6620, and 63.6640(a); Minn. R. 7017.2020, subp. 1
If the Permittee demonstrates compliance during two consecutive tests, testing frequency may be reduced to annually until any annual test shows noncompliance, at which time, the Permittee shall resume semiannual testing.	
Performance Test Notifications and Submittals: Notification of Intent to Conduct Performance Test (written): due 60 days before each Performance Test as required by Sections 63.6645(e) and 63.7(b)(1) Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-Test Meeting: due 7 day before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy or CD: due 105 day after each Performance Test. The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.	40 CFR Sections 63.7(b)(1) and 63.6645(e); Minn. R. 7017.2030, subp. 1-4; Minn. R. 7017.2018 and Minn. R. 7017.2035, subps. 1&2
Performance Test - Change of Catalyst: If the Permittee changes the CE 001 catalyst, the Permittee shall reestablish the pressure drop operating value across the catalyst and conduct a performance test to demonstrate that the required CO reduction requirement is being met.	40 CFR Section 63.6640(b)
OPERATING REQUIREMENTS	hdr
Permitted Fuel: Distillate fuel oil with a sulfur content not to exceed 0.495 percent by weight.	Minn. R. 7007.0800, subp. 2
CE 001 Catalytic Oxidizer Operating Requirements: 1. Maintain the catalyst so that the pressure drop across the catalyst does not change by more than 2.0 inches of water column at 100 percent load, +/-10 percent, from the pressure drop that was measured during the initial performance test; 2. Maintain EU 017 exhaust temperature so that CE 001 inlet temperature is no less than 450 deg. F and no greater than 1350 deg. F, on a 4-hour rolling average.	40 CFR Section 63.6600(b); 40 CFR part 63, subp. ZZZZ Table 2b
The Permittee shall operate and maintain EU 017 and CE 001 in a manner consistent with good air pollution control practices for minimizing emissions at all times including during startup, shutdown, and malfunction.	40 CFR Section 63.6605(b)

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

MONITORING REQUIREMENTS	hdr
Fuel Supplier Certification: The Permittee shall obtain and maintain a fuel supplier certification for each shipment of distillate fuel oil, certifying that the sulfur content does not exceed 0.495% by weight.	Minn. R. 7007.0800, subps. 4 & 5
Catalyst Temperature Monitoring: The Permittee shall install, operate, and maintain a continuous parameter monitoring system to measure catalyst inlet temperature, according to the requirements of 40 CFR Section 63.8. The Permittee shall continuously monitor catalyst inlet temperature (except during monitor malfunction, associated repairs, and required quality assurance and control activities) whenever EU 017 is operating. Data measured and recorded during malfunctions, associated repairs, and required quality assurance or control activities shall not be used in reporting of emission or operating levels.	40 CFR Sections 63.8, 63.6625(b), 63.6635(b), and 63.6635(c)
CONTINUOUS COMPLIANCE REQUIREMENTS	hdr
The Permittee shall demonstrate continuous compliance with the requirements in Tables 2a and 2b of Part 63, Subpart ZZZZ, as follows: 1. conduct semiannual performance tests to demonstrate that the CO reduction requirement is attained; 2. collect catalyst inlet temperature data according to Section 63.6625(b); 3. reduce catalyst inlet temperature data to 4-hour rolling averages; 4. maintain the 4-hour rolling average between 450 deg. F and 1350 deg. F; 5. measure catalyst pressure drop once each month and demonstrate the pressure drop is within the operating limitation established during the performance test.	40 CFR Section 63.6640(a)
The Permittee shall report each event when the CO emissions reduction requirement, the catalyst inlet temperature, or the catalyst pressure drop did not meet the applicable limitation or requirement.	40 CFR Section 63.6640(b)
The Permittee shall develop a startup, shutdown, and malfunction plan (SSMP) no later than the date of initial startup of EU 017, and the SSMP shall meet the requirements of Section 63.6(e)(3). The Permittee shall operate in accordance with its SSMP during startup, shutdown, and malfunction. Deviations from the emission or operating limitations during startup, shutdown, or malfunction are not violations if the Permittee demonstrates that it was operating EU 017 in accordance with the SSMP. For new, reconstructed, and rebuilt stationary RICE, deviations from the emission or operating limitations during the first 200 hours of operation from engine startup (engine burn-in period) are not violations.	40 CFR Sections 63.6(e)(3), 63.6640(c), and 63.6640(d)
RECORDKEEPING REQUIREMENTS	hdr
The Permittee shall maintain the following records: 1. A copy of each notification and report submitted to comply with subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirement in Section 63.10(b)(2)(xiv); 2. The records in Section 63.6(e)(3)(iii) through (v) related to startup, shutdown, and malfunction; 3. Records of performance tests and performance evaluations as required in Section 63.10(b)(2)(viii); 4. Records described in Section 63.10(b)(2)(vi) through (xi); 5. Previous (i.e., superseded) versions of the performance evaluation plan as required in Section 63.8(d)(3); 6. Requests for alternatives to the relative accuracy test for CEMS or CPMS as required in Section 63.8(f)(6)(i), if applicable.	40 CFR Sections 63.6655(a) and (b)
The Permittee shall maintain records of performance tests, catalyst inlet temperature, and catalyst pressure drop.	40 CFR Section 63.6655(d)
NOTIFICATION AND REPORTING REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

<p>Part 63 Subpart A Notifications: The Permittee shall submit applicable notifications described in the following sections of Part 63, Subp. A. Some of these notifications are also listed individually in other locations in this permit, as indicated below:</p> <ol style="list-style-type: none"> 1. 63.7(b) notification of performance test due 60 days before test (also listed above in the 'Performance Test Notifications and Submittals' requirement for EU 017) 2. 63.7(c) performance test quality assurance program 3. 63.8(e) CMS performance evaluation 4. 63.8(f)(4) conducting CMS performance evaluations and deadlines 5. 63.8(f)(6) alternative to CEMS relative accuracy test 6. 63.9(b) initial notifications (commencement of construction and initial startup notifications in Table B) 	<p>40 CFR Sections 63.6640(e) and 63.6645(a)</p>
<p>Part 63 Subpart A Notifications (continued)</p> <ol style="list-style-type: none"> 7. 63.9(c) compliance extension request 8. 63.9(d) notification that the source is subject to special compliance requirements 9. 63.9(e) notification of performance test (also listed above in the 'Performance Test Notifications and Submittals' requirement for EU 017) 10. 63.9(g) additional notification requirements for sources with CMS 11. 63.9(h) notification of compliance status (listed in Table B) <p>The Permittee shall also report each instance when the requirements in Subp. ZZZZ Table 8 (applicability of Part 63 general provisions to Subp. ZZZZ) were not met.</p>	<p>40 CFR Sections 63.6640(e) and 63.6645(a)</p>
<p>Compliance Report Content - No Deviations: The report shall contain the following information:</p> <ol style="list-style-type: none"> 1. Company name and address; 2. Responsible official's statement certifying report content accuracy with official's name, title, and signature; 3. Report date and beginning and ending dates of reporting period; 4. All information in 63.10(d)(5)(i) for startup, shutdown, or malfunction for the reporting period (periodic startup, shutdown, and malfunction report); 5. A statement that no deviations occurred, if there were no deviations during the reporting period; 6. A statement that there were no periods that the CMS was out-of-control, if there were no out-of-control periods during the reporting period. 	<p>40 CFR Sections 63.6650(c)(1) through (6)</p>
<p>Compliance Report Content - Deviations: For each deviation from an emission or operating limitation, the Permittee shall include information from Section 63.6650(c)(1) through (4) and the following:</p> <ol style="list-style-type: none"> 1. Date and start/stop time of each malfunction; 2. Date, time, and duration that each CMS was inoperative except for zero (low level) and high level checks; 3. Date, time, and duration that each CMS was out-of-control, including information in Section 63.8(c)(8); 4. Date and time each deviation started and stopped, and whether each deviation occurred during a malfunction or other during another period; 5. A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period; <p>continued</p>	<p>40 CFR Sections 63.6650(e)(1) through (5)</p>
<ol style="list-style-type: none"> 6. A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes; 7. A summary of the total duration of CMS downtime during the reporting period, and the total duration of CMS downtime as a percent of the total operating time of the stationary RICE at which the CMS downtime occurred during that reporting period; 8. An identification of each parameter and pollutant that was monitored at the stationary RICE; 9. A brief description of the stationary RICE; 10. A brief description of the CMS; 11. The date of the latest CMS certification or audit; 12. A description of any changes in CMS, processes, or controls since the last reporting period. 	<p>40 CFR Sections 63.6650(e)(6) through (12)</p>

TABLE B: SUBMITTALS

11/04/04

Facility Name: Minnesota Diversified Products Inc
Permit Number: 05300443 - 002

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.

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 any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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.

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

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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: ONE TIME SUBMITTALS OR NOTIFICATIONS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

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 compliance status	due 60 days after Initial Performance Test. The notification shall include the results of the initial compliance test and be made in accordance with 40 CFR Sections 63.9(h)(2)(ii) and 63.10(d)(2).	EU017
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup of EU 017.	EU017
Notification of the Date Construction Began	due 30 days after Start Of Construction of EU 017.	EU017
Report	due 2 days after Startup, shutdown, or malfunction when actions taken by the Permittee during the startup, shutdown, or malfunction are not consistent with the SSMP. The immediate report shall be made by telephone or facsimile, and a written report shall be submitted within 7 days after the end of the event. Days are determined on a business day basis.	EU017

TABLE B: RECURRENT SUBMITTALS

11/04/04

Facility Name: Minnesota Diversified Products Inc

Permit Number: 05300443 - 002

What to send	When to send	Portion of Facility Affected
Report	due 31 days after end of each half-year starting 08/14/2004. This is the Compliance Report required by Section 63.6650(b). For details regarding the report content, refer to the "Compliance Report Content - No Deviations" and "Compliance Report Content - Deviations" requirements for EU 017 in Table A.	EU017
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 03/04/2002. This report shall include the EU 017 Compliance Report required by 40 CFR Section 63.6650(b). 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
Annual Report	due 31 days after end of each calendar year starting 03/04/2002. The Permittee shall submit an annual report by January 31 that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall document the VOC 12-month rolling average calculations for the previous calendar year and the equipment and stack changes that took place during the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor source status for New Source Review.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 03/04/2002 (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX I
Facility Name: Minnesota Diversified Products, Inc.
Permit Number: 05300443-002

Insignificant Activities and General Applicable Requirements

The table below lists the insignificant activities that are currently at the Facility and their associated general applicable requirements.

Minn. R. 7007.1300, subp.	Rule Description of the Activity	General Applicable Requirement
3(D)(2)	Equipment venting PM/PM ₁₀ inside a building, provided that emissions from the equipment are filtered through an air cleaning system and vented inside of the building 100% of the time. <i>MDP has EPS milling and cutting equipment that is controlled and vented internally.</i>	Minn. R. 7011.0715 (PM and opacity)
3(H)(4)	Brazing, soldering, or welding equipment.	Minn. R. 7011.0715 (PM and opacity)
3(H)(5)	Blueprint copiers and photographic processes;	Minn. R. 7011.0110 (opacity)
3(I)	Individual emissions units at a stationary source, each of which have a PTE of the following pollutants in amounts less than: 2 tpy of CO and 1 tpy each of NO _x , SO ₂ , PM/PM ₁₀ , VOC, and ozone. <i>MDP has 18 natural gas space heaters and a printing operation that qualify under this subpart.</i>	Minn. R. 7011.0715 (PM and opacity) or Minn. R. 7011.0610 (PM and opacity)

Under Minn. R. 7007.1250, subp. 1(A), the Permittee may add insignificant activities to the stationary source throughout the term of the permit without getting permit amendments. Certain exclusions apply and are listed in Minn. R. 7007.1250, subp. 2. In addition, this permit specifically prohibits the Permittee from making any modifications that would make the source major under NSR. The following table is a listing of the insignificant activities that the Permittee is somewhat likely to add and their associated applicable requirements.

Minn. R. 7007.1300, subp.	Rule Description of the Activity	General Applicable Requirement(s)
3(A)	Fuel Use: space heaters fueled by kerosene, natural gas, or propane.	Minn. R. 7011.0515 (PM and opacity)
3(B)(1)	Infrared electric ovens	Minn. R. 7011.0110 (opacity)
3(H)(8)	Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners.	Minn. R. 7011.0610 & Minn. R. 7011.0715 (PM and opacity)

Emission Unit Description from Delta
paper copy only

TECHNICAL SUPPORT DOCUMENT
For
DRAFT/PROPOSED AIR EMISSION PERMIT NO. 05300443-002

This technical support document 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 **preliminary** determination to issue the **draft/proposed** permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 3086)
Minnesota Diversified Products, Inc. 9091 County Road 50 Rockford, Hennepin County, MN 55373	9091 County Road 50 Rockford Hennepin County
Contact: Steve Slavik Phone: 763-477-5854	

1.2. Description of the Facility

Minnesota Diversified Products, Inc. (MDP) manufactures rigid polystyrene boardstock by both foam extrusion and the expandable polystyrene (EPS) bead process. The EPS process results in emissions of pentane and combustion products from the boilers used to produce steam for the process. The extrusion process results in emissions of methyl chloride, HCFC 142b, and HCFC 22 which are used as blowing agents. MDP also fabricates pre-manufactured urethane, fabricates and repairs equipment in a machine shop, and laminates other products onto foam products with hot-melt glues. The facility is currently operating with a title V permit that restricts emissions to less than the major source level under NSR, but allows major source level HAP emissions.

1.3 Description of the Activities Allowed by this Permit Action

This is a moderate amendment authorizing installation of a peaking electric generator. The generator is a 1000 horsepower 750 kilowatts Caterpillar engine that is subject to the MACT standard for reciprocating internal combustion engines (RICE), at part 63, subp. ZZZZ.

On July, 22, 2004, the MPCA sent a letter to the Permittee authorizing construction of the generator, in accordance with Minn. R. 7007.1450, subp. 7(B). However, the letter stated that the Permittee shall not operate the generator until a permit is issued authorizing operation of the generator.

1.4. Facility Emissions:

Table 1. Title I Emissions Increase Summary

Pollutant	Emissions Increase from the Modification (tpy)	Limited Emissions Increase from the Modification (tpy)	Source-wide Contemporaneous Increases and Decreases (tpy)	Net Emissions Increase (tpy)	PSD/112(g) Threshold for major sources	NSR/112(g) Review Required? (Yes or No)
PM	2.28	2.28	0	2.28	250	No
PM ₁₀	1.87	1.87	0	1.87	250	No
NO _x	76.78	76.78	0	76.78	250	No
SO ₂	16.52	16.52	0	16.52	250	No
CO	8.34	8.34	0	8.34	250	No
Ozone (VOC)	2.94	2.94	0	2.94	250	No
Lead	0	0	0	0	250	No
Single HAP	0.01	0.01	NA	0.01	10	No
Total HAP	0.05	0.05	NA	0.05	25	No

Table 2. Non-Title I Emissions Increase Summary

Pollutant	After Change (lb/hr)	Before Change (lb/hr)	Net Change (lb/hr)	Upper Threshold for Insignificant Modification (lb/hr)	Upper Threshold for Minor Amendment (lb/hr)	Type of Amendment
PM ₁₀	0.43	0	0.43	0.855	3.42	InsigMod
NO _x	17.53	0	17.53	2.28	9.13	Moderate
SO ₂	3.77	0	3.77	2.28	9.13	Minor
CO	6.35	0	6.35	5.70	22.80	Minor
VOC	0.67	0	0.67	2.28	9.13	InsigMod
Lead	0	0	0	0.025	0.11	InsigMod

Table 3. Total Facility Potential to Emit Summary

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions*	42.44	42.03	48.57	85.77	13.4	246.9	67.58	73.61
Total Facility Actual Emissions (2002)	0.03	0.03	0	0.44	0.37	37.6	HAPs not reported in emission inventory	

* Limited PTE is sum of PER 001 emissions data and emissions from new engine EU 017

Table 4. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		VOC	PM, PM ₁₀ , NO _x , SO ₂ , CO
Part 70 Permit Program	VOC, HAP		PM ₁₀ , NO _x , SO ₂ , CO
Part 63 NESHAP	Single HAP, Total HAP		

2. Regulatory and/or Statutory Basis

New Source Review (NSR)

The source is an existing non-major source under NSR due to a VOC usage limit. The proposed change allowed by this permit does not change this NSR permitting status.

Part 70 Permit Program

The facility is an existing major source for part 70 due to HAP and VOC emissions.

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)

The new diesel generator is subject to 40 CFR part 63, subp. ZZZZ, standards of performance for reciprocating internal combustion engines (RICE). The effective date for this subpart is the date of publication of the final rule, which was June 15, 2004.

Although the engine is not itself a major HAP source, it is located at a source that is a major HAP source, and therefore, the engine is subject to the RICE maximum achievable control technology standard.

In accordance with Minn. R. 7007.1450, an MPCA letter approving construction of EU 017 was sent to the Permittee on July 22, 2004. Therefore, the Permittee commenced construction after the June 15, 2004, effective date of the relevant standard (part 63, subp. ZZZZ). This RICE initial startup date will be after August 16, 2004, and therefore, according to §63.6595(a)(3), for this RICE, the compliance date with the applicable emission limitations will be the date of initial startup. Also, the initial notification required by §§63.6645(c) and 63.9(b)(4)(i) is not necessary because the application for the approval to construct and operate EU 017 serves as this initial notification according to §63.5(d)(1). However, the Permittee is required to submit notifications for the commencement of construction no later than 30 days after the start of construction, and of the date of actual startup within 15 days after startup, as required by §63.9(b)(4)(iii) and (v), respectively.

Minnesota State Rules

The new RICE diesel generator is subject to Minn. R. 7011.2300 Standards of Performance for Stationary Internal Combustion Engines

Table 5. Regulatory Overview of Units Affected by the Modification/Permit Amendment

EU #	Applicable Regulations	Comments:
EU 017	40 CFR part 63, subp. ZZZZ	Requirements to reduce CO, conduct performance testing, maintain continuous compliance, and conduct monitoring, recordkeeping, and reporting.
	Minn. R. 7011.2300	Opacity and SO ₂ limits

3. Technical Information

3.1 Calculations of Potential to Emit

Attached is the EU 017 emissions spreadsheet.

3.2 Periodic Monitoring

40 CFR Part 63 subpart ZZZZ contains all necessary monitoring requirements, and therefore, no additional periodic monitoring requirements to meet part 70.6(a)(3) are necessary.

3.3 Air Dispersion Modeling

The Permittee was required to complete the SCREEN 3 model for this proposed generator. Results from the model show not exceedance of target levels. The following table is a summary of the results.

Pollutant and Averaging Time	Maximum Controlled Emissions lb/hr	Maximum Controlled Emissions grams/sec	1-hour Ambient Air Impact at 1 gm/sec microgm/m3	Averaging time scaling factor	Ambient Air Impact for stated Averaging Time microgm/m3	Corresponding Target Level
PM ₁₀ 24 hr	0.43	0.0542	304.6	0.4	6.60	150
SO ₂ 3 hr	3.77	0.475	304.6	0.9	130.22	1300
SO ₂ 24 hr	3.77	0.475	304.6	0.4	57.88	365
NO _x 1 hr	17.53	2.209	304.6	1.0	672.79	1130
NO _x 24 hr	17.53	2.209	304.6	0.4	269.12	282
CO 1 hr	6.35	0.8001	304.6	1.0	243.71	40000
CO 8 hr	6.35	0.8001	304.6	0.7	170.60	10000

3.4 Public Notice and EPA Review

The MPCA is not required to public notice this amendment. The MPCA has the option of public noticing the amendment as stated in Minn. R. 7007.0850, subp. 2.D., if the amendment is likely to generate significant material adverse comment from the public, based on previous adverse public comment on the proposed amendment or related issues. According to the permit engineer that wrote the previous permit (the title V operating permit), there was no adverse public comment. The Permittee had just built a new facility down the road that had received lots of public controversy (required an EAW as well), so the MPCA did some preventative pre-notice communication with the public near the facility, and had no problems at all with the existing Title V permit. The new site controversy was mainly a land use issue, and not an air pollution issue.

Public Notice Start Date: Not Applicable Public Notice End Date: Not Applicable

EPA 45-day Review Start Date: September 13, 2004 EPA 45-day Review Period End Date: October 28, 2004

No comments were received from EPA during their review period.

4. Conclusion

Based on the information provided by Minnesota Diversified Products, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05300443-002 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Marshall Cole (permit writer/engineer)
 Suzanne Venem (enforcement)
 Jim Kolar (stack testing)
 Peggy Bartz (peer reviewer)

Attachment: EU 017 Calculation Spreadsheet