

**AIR EMISSION PERMIT NO. 13100068- 001
IS ISSUED TO**

Telamco, Inc.

Telamco
636 Industrial Drive
Lonsdale, Rice County, MN 55046

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	December 12, 2000

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 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; Synthetic Minor Part 70

Issue Date: April 18, 2001

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

Rodney E. Massey, P.E.
District Director

For Karen A. Studders
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:

This facility manufactures membrane switches. The membrane switch consists of a top and bottom circuit layer separated by a spacer layer. The circuit layers are purchased from outside vendors. The facility manufactures the spacer material, which is the process that requires an air emission permit.

The resins used to produce the spacer are dissolved in methylene chloride and coated onto a plastic film. Holes are diecut in this material to allow the circuit to close when keys are depressed. The switch layers are assembled and then cut into their final shape. After a connector is crimped to the tail they are electrically tested and visually inspected before shipping.

Natural gas forced air furnaces (an insignificant activity) are used to heat the building.

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/18/01

Facility Name: Telamco
 Permit Number: 13100068 - 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
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
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
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)

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/18/01

Facility Name: Telamco

Permit Number: 13100068 - 001

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)
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).	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

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/18/01

Facility Name: Telamco

Permit Number: 13100068 - 001

Subject Item: EU 001 Mylar Coating Operation**Associated Items:** SV 001 coater

SV 002 mixer

SV 003 cleanup

What to do	Why to do it
EMISSION LIMITS	hdr
HAP-Single: less than or equal to 9.0 tons/year using 12-month Rolling Sum	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 2
HAPs - Total: less than or equal to 24.0 tons/year using 12-month Rolling Sum	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 2
MONITORING AND RECORDKEEPING	hdr
Determination of Material Content For Emission Calculations: HAP content in percent by weight of each material used shall be determined using the Environmental Data sheet (EDS) or Material Safety Data Sheet (MSDS) provided by the supplier of each material. If the EDS or MSDS provides a material content range, the highest value in the range shall be used in all emission calculations. Alternative methods approved by the MPCA may be used to determine material HAP content. In addition, the Commissioner reserves the right to require the Permittee to determine the HAP content 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 ESD or MSDS.	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 4
EU 001 Single HAP Monthly Emission Calculations: By the 15th day of each month, calculate and record EU 001 emissions of each single HAP for the previous month. Monthly emissions of each EU 001 Single HAP shall be determined by summing the calculated single HAP emissions from each material used in EU 001 during the previous month, using the following equation: EU 001 SINGLE HAP = E[HAP-Containing Material * %Single HAP/2000] where: HAP-Containing Material = Each HAP-Containing Material used in the previous month, in pounds of HAP-Containing Material %Single HAP = weight % of single HAP in HAP-Containing Material EU 001 SINGLE HAP = Monthly EU 001 single HAP emissions E = Summation	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 5
EU 001 Single HAP 12-Month Rolling Sum Emission Calculations: By the 15th day of each month, calculate and record the 12-month rolling sum emissions of each EU 001 Single HAP by summing the monthly emissions of each single HAP for the previous 12 months.	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 5
EU 001 Total HAP Emission Calculations: By the 15th day of each month, calculate and record EU 001 Total HAP emissions for the previous month by summing the EU 001 SINGLE HAP emissions during the previous month. Calculate and record the 12-month rolling sum total HAP emissions by summing the total monthly HAP emissions for the previous 12 months.	Title I Condition: to limit emissions to less than the major source threshold of 40 CFR pt. 63 and pt. 70; Minn. R. 7007.0800, subp. 5

TABLE B: SUBMITTALS

04/18/01

Facility Name: Telamco
Permit Number: 13100068 - 001

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: RECURRENT SUBMITTALS

04/18/01

Facility Name: Telamco

Permit Number: 13100068 - 001

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. 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 following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner <, both to the Commissioner, and to the U.S. EPA regional office in Chicago>. This report covers all deviations experienced during the calendar year. < The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604>	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 13100068-001

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 3083)
636 Industrial Drive Lonsdale, MN 55046 (507) 744-5504	636 Industrial Drive Lonsdale Rice County, Minnesota 55046

1.2. Description of the facility

This facility manufactures membrane switches. The membrane switch consists of a top and bottom circuit layer separated by a spacer layer. The circuit layers are purchased from outside vendors. The facility manufactures the spacer material, which is the process that requires an air emission permit.

The resins used to produce the spacer are dissolved in methylene chloride and coated onto a plastic film. Holes are diecut in this material to allow the circuit to close when keys are depressed. The switch layers are assembled and then cut into their final shape. After a connector is crimped to the tail they are electrically tested and visually inspected before shipping.

Natural gas forced air furnaces (an insignificant activity) are used to heat the building.

This new facility will house the process equipment, including insignificant activities, that are present in an existing nearby manufacturing building.

1.3 Description of any changes allowed with this permit issuance

Not applicable because this is a new facility.

1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Permit Number and Issuance Date	Action Authorized
NA	NA – new facility

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

	PM tpy	PM ₁₀ tpy	SO ₂ tpy	NO _x tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	<0.1	<0.1	<0.1	0.35	0.29	0.43	neg	9.0	24.0
Total Facility Actual Emissions*	<0.1	<0.1	<0.1	0.35	0.29	0.43	neg	6.25	6.35

*Based on actual HAP emissions from existing facility from which equipment will be removed and installed in new facility. Actual emissions of other pollutants assumed to be same as potential emissions.

Table 2. Facility(TF) and Permit Classification

Classification)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (list pollutant)			PM, PM ₁₀ , VOC, SO ₂ , NO _x , CO, Pb
Part 70 Permit Program		HAP – single HAP - total	PM ₁₀ , VOC, NO _x , CO

* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

2. Regulatory and/or Statutory Basis

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

Regulatory Overview of Facility

EU#	Applicable Regulations	Comments:
EU 001	Title I Condition: to avoid major source status under 40 CFR pts. 63 and 70; Minn. R. 7007.0800, subp. 2	Limit single and total HAP emissions to less than major source levels defined in 40 CFR pts. 63 and 70

3. Technical Information

In addition to the draft permit, the following additional information should be attached to or included as additional sections to the TSD:

- Permittee requested a limit of 9.0 tpy of methylene chloride, however, permittee also uses 2,4-toluene diisocyanate (CAS #584849) which is a HAP. In addition, HAP usage by permittee is not restricted to methylene chloride. Therefore limit is for single HAP in lieu of methylene chloride.
- No comments were received during the public notice.

4. Conclusion

Based on the information provided by the Telamco, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 13100068-001 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 M. Cole, Dan Brady

Attachment: emission calculations

Permit Action Number: 13100068-001

Date: 3/1/2004