

**AIR EMISSION PERMIT NO. 00300199- 003  
IS ISSUED TO**

**VISION-EASE LENS INC.**

Vision-Ease Lens – Ramsey  
7000 Sunwood Drive  
Ramsey, Anoka County, Minnesota 55303

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	March 31, 2000

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. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

**Permit Type:** Federal; Part 70

**Issue Date:** January 3, 2002

**Expiration:** January 3, 2007

All Title I Conditions do not expire.

---

Michael J. Tibbetts, Program Manager  
Major Facilities Section  
Water, Land & Compliance Lead

for Karen A. Studders, Commissioner  
Minnesota Pollution Control Agency

## **TABLE OF CONTENTS**

**Notice to the Permittee**

**Permit Shield**

**Facility Description**

**Table A: Limits and Other Requirements**

**Table B: Submittals**

**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. 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. 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:**

The Vision-Ease Lens Ramsey facility is a 150,000 square foot facility that houses manufacturing of polycarbonate ophthalmic lenses, a research and development operation, and a lens distribution center. The manufacturing area operates 24 hours/day, 7 days/week. The production of polycarbonate ophthalmic lenses includes injection molding, scratch-resistant coating, inspection, packaging, and support functions.

Air emissions from the facility result from three types of activities. Minor nickel and chromium emissions are generated from tool plating and repair operations. Natural gas combustion by-products (are generated by boilers and roof-top heating units used to heat the facility. Volatile organic compound (VOC) emissions are generated by the application and curing of solvent-based scratch-resistant coatings. The VOCs are primarily alcohols and ketones, including methanol, and methyl ethyl ketone which are hazardous air pollutants. A solvent cleaner, emission unit 804, was retired in June, 2001.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

**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**

<b>What to do</b>	<b>Why to do it</b>
<b>OPERATIONAL REQUIREMENTS</b>	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)
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
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
<b>PERFORMANCE TESTING</b>	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
<b>MONITORING REQUIREMENTS</b>	hdr
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 and/or B, 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
<b>RECORDKEEPING</b>	hdr
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)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

REPORTING	hdr
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	Minn. R. 7019.1000, subp. 3
<p>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.</p> <p>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.</p>	Minn. R. 7019.1000, subp. 2
<p>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.</p>	Minn. R. 7019.1000, subp. 1
<p>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:</p> <ol style="list-style-type: none"> <li>1. the cause of the deviation;</li> <li>2. the exact dates of the period of the deviation, if the deviation has been corrected;</li> <li>3. whether or not the deviation has been corrected;</li> <li>4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and</li> <li>5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.</li> </ol>	Minn. R. 7019.1000, subp. 1
MISCELLANEOUS REQUIREMENTS	hdr
<p>Comply with Fugitive Emission Control Plan: The Permittee shall follow the actions and record keeping specified in the control plan. The plan may be amended by the Permittee with the Commissioner's approval. If the Commissioner determines the Permittee is out of compliance with Minn. R. 7011.0150 or the fugitive control plan, then the Permittee may be required to amend the control plan and/or to install and operate particulate matter ambient monitors as requested by the Commissioner.</p>	Minn. Stat. Section 116.07, subd. 4a; Minn. R. 7007.0800, subp. 2
<p>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.</p>	Minn. R. 7007.1150 through Minn. R. 7007.1500
<p>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).</p>	Minn. R. 7007.1400, subp. 1(H)
<p>The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.</p>	Minn. R. 7007.0800, subp. 16
<p>Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).</p>	Minn. R. 7007.0800, subp. 9(A)
<p>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.</p>	Minn. R. 7019.3000 through Minn. R. 7019.3010
<p>Emission Fees: due 60 days after receipt of an MPCA bill.</p>	Minn. R. 7002.0005 through Minn. R. 7002.0095

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

**Subject Item: GP 001 Indirect Heating Equipment****Associated Items:** EU 807 Boiler 1

EU 808 Boiler 2

EU 809 HVAC RTU-1

EU 810 HVAC RTU-2

EU 811 HVAC RTU-3

EU 812 HVAC RTU-5

EU 813 HVAC RTU-6

EU 814 HVAC RTU-7

EU 815 HVAC RTU-10

EU 816 HVAC RTU-11

EU 817 HVAC RTU-12

EU 818 HVAC RTU-13

EU 819 HVAC RTU-14

EU 820 HVAC RTU-15

EU 821 HVAC RTU-16

EU 822 HVAC RTU-17

EU 823 HVAC RTU-23

EU 824 HVAC RTU-25

EU 825 HVAC RTU-26

EU 826 HVAC RTU-27

EU 827 HVAC RTU-28

EU 828 HVAC RTU-29

EU 829 HVAC RTU-30

EU 830 HVAC RTU-31

EU 831 HVAC RTU-32

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . This limit applies individually to each unit in Group 001.	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. This limit applies individually to each unit in Group 001.	Minn. R. 7011.0515, subp. 2
The Permittee shall burn only natural gas in the Group 001 units and keep records on a monthly basis of fuel usage. These records may consist of purchase records or receipts.	Minn. R. 7011.0515

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

**Subject Item:** GP 002 Coaters**Associated Items:** EU 800 Coater #1

EU 801 Coater #4

EU 802 Coater #2-3

EU 803 Coater #5

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**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

**Subject Item:** EU 805 Nickel Strike Tank**Associated Items:** SV 108

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**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

**Subject Item:** EU 806 Chrome Flash Tank**Associated Items:** SV 108

What to do	Why to do it
PART 63 GENERAL PROVISIONS	hdr
General provisions of Part 63 applicable to Subpart N are provided in Table 1 to Subpart N of Part 63.	40 CFR Part 63
EMISSION LIMITS	hdr
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(A)
The Permittee shall not allow the surface tension of the electroplating bath (EU806) to exceed 45 dynes per centimeter at any time during operation of the tank.	40 CFR 63.342(d)(2)
MONITORING TO DEMONSTRATE CONTINUOUS COMPLIANCE	hdr
The Permittee has accepted 45 dynes/cm as the maximum surface tension value that corresponds to compliance with the applicable emission limit.	40 CFR 63.343(c)(5)(i)
The permittee shall monitor the surface tension of the electroplating bath. Operation of the affected source at a surface tension greater than 45 dynes/cm shall constitute noncompliance with the standards.	40 CFR 63.343(c)(5)(ii)
The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, Part 63, Appendix A	40 CFR 63.343(c)(5)(ii)(A)
The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of operation.	40 CFR 63.343(c)(5)(ii)(B)
Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in 40 CFR 63.343(c)(5)(ii)(B)	40 CFR 63.343(c)(5)(ii)(C)
Once a bath solution is drained from the tank and new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in frequency allowed following the procedures of 40 CFR 63.343(c)(5)(ii)(B) and (C)	40 CFR 63.343(c)(5)(iii)
WORK PRACTICE STANDARDS	hdr
The permittee is subject to the Work Practice Standards of 40 CFR Part 63.342(f). The Work Practice Standards of 40 CFR Part 63.342(f), current as of permit issuance, are included below.	40 CFR 63.342(f)
At all times, including periods of startup, shutdown, and malfunction, owners and operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance (O&M) plan required by 40 CFR 63.342(f)(3).	40 CFR 63.342(f)(1)(i)
Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the O&M plan required by 40 CFR 63.342(f)(3).	40 CFR 63.342(f)(1)(ii)
Operation and maintenance requirements established pursuant to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards.	40 CFR 63.342(f)(1)(iii)
Determination of whether acceptable O&M procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.	40 CFR 63.342(f)(2)(i)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

Based on the results of a determination made under 40 CFR 63.342(f)(2)(i), the Administrator may require that the permittee make changes to the operation and maintenance plan required by 40 CFR 63.342(f)(3). Revisions may be required if the Administrator finds that the plan: (A) does not address a malfunction that has occurred; (B) fails to provide for the operation of the source, the air pollution control techniques, or the control system or the process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or (C) does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as possible.	40 CFR 63.342(f)(2)(ii)
Prepare an O&M plan within 30 days if not completed at the time of permit issuance. The plan shall include the following elements: (A) the plan shall specify the O&M criteria for the unit, the add-on air pollution control device, and the process and control system monitoring equipment, and shall include a standardized checklist to document the O&M of the unit; (B) the plan shall incorporate the work practice standards for any air pollution control or monitoring equipment; (C) proposed work practice standards for any air pollution control device or monitoring equipment not listed in 40 CFR 63.342 Table 1; (D) procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and (E) a systematic procedure for identifying malfunctions of process equipment, air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.	40 CFR 63.342(f)(3)(i)
If the O&M plan fails to address an event that meets the characteristics of a malfunction at the time the plan is developed, the permittee shall revise the O&M plan within 45 days after such an event occurs.	40 CFR 63.342(f)(3)(ii)
Recordkeeping associated with the O&M plan is identified in 40 CFR 63.346(b). Reporting associated with the O&M plan is identified in 40 CFR 63.347(g) and (h) and 40 CFR 63.342(f)(3)(iv).	40 CFR 63.342(f)(3)(iii)
If action taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the O&M plan, the permittee shall record the actions taken for that event and shall report by phone such actions within two working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven working days after the end of the event, unless the permittee makes alternate reporting arrangements with the Administrator in advance.	40 CFR 63.342(f)(3)(iv)
The permittee shall keep the written O&M plan on record after it is developed to be made available for inspection, upon request, for the life of the unit or until the unit is no longer subject to the provisions of this subpart. If the O&M plan is revised, the permittee shall keep previous versions of the O&M plan on record for a period of five years after each revision to the plan.	40 CFR 63.342(f)(3)(v)
The permittee may use applicable standard operating procedures manuals, OSHA plans, or other existing plans to satisfy the O&M plan requirement, provided the alternative plans meet the requirements of this section.	40 CFR 63.342(f)(3)(vi)
PROVISIONS FOR NEW AND RECONSTRUCTED SOURCES	hdr
The owner or operator of a new or reconstructed affected source is subject to 40 CFR 63.5(a), (b)(1), (b)(5), (b)(6), and (f)(1), as well as the provisions of 40 CFR 63.345.	40 CFR 63.345(b)
The Permittee shall not construct a new affected source or reconstruct an affected source subject to Subpart N, or reconstruct a source such that it becomes an affected source subject to Subpart N, without submitting a notification of construction or reconstruction to the Administrator. The notification shall contain the information identified in 40 CFR 63.345(b)(2) and (3), as appropriate.	40 CFR 63.345(b)(1)
The notification of construction or reconstruction required under paragraph 40 CFR 63.345(b)(1) shall include: (i) The owner or operator's name, title, and address; (ii) The address (i.e., physical location) or proposed address of the affected source if different from the owner's or operator's; (iii) A notification of intention to construct a new affected source or make any physical or operational changes to an affected source that may meet or has been determined to meet the criteria for a reconstruction as defined in 40 CFR 63.2; (iv) An identification of subpart N of this part as the basis for the notification; (v) The expected commencement and completion dates of the construction or reconstruction; (vi) The anticipated date of (initial) startup of the affected source;	40 CFR 63.345(b)(2)
(Continued)	

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

(vii) The type of process operation to be performed (hard or decorative chromium electroplating, or chromium anodizing); (viii) A description of the air pollution control technique to be used to control emissions from the affected source, such as preliminary design drawings and design capacity if an add-on air pollution control device is used; and (ix) An estimate of emissions from the source based on engineering calculations and vendor information on control device efficiency, expressed in units consistent with the emission limits of this subpart. Calculations of emission estimates should be in sufficient detail to permit assessment of the validity of the calculations.	40 CFR 63.345(b)(2) (continued)
<b>RECORDKEEPING REQUIREMENTS</b>	hdr
Fulfill all recordkeeping requirements outlined in 40 CFR 63.346 and in the General Provisions to 40 CFR part 63, according to the applicability of Subpart A as identified in Table 1 of Subpart N.	40 CFR 63.346(a)
Maintain the following applicable records for EU806: (1) inspection records for any air pollution control device and monitoring equipment, (2) records of all maintenance performed on EU806 or pollution control or monitoring device, (3) records of the occurrence, duration, and cause of each malfunction of EU806 or pollution control or monitoring device, (4) actions taken during periods of malfunction, (5) other records or checklists necessary to demonstrate consistency with the O&M plan, (6) test reports, (7) performance test conditions, (8) monitoring data, (9) all periods of excess emissions that occur during malfunction, (10) all periods of excess emissions that occur during periods other than malfunctions, (11) operating time	40 CFR 63.346(b)
<b>REPORTING</b>	hdr
The owner or operator of an affected source shall notify the Administrator in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Administrator to have an observer present during the test. Observation of the performance test by the Administrator is optional.	40 CFR 63.347(d)
The owner or operator of an affected source that is located at a major source site shall submit a summary report to the Administrator to document the ongoing compliance status of the affected source. The report shall contain the information identified in 40 CFR 63.347(g)(3), and shall be submitted semiannually except when:  (i) The Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source; or  (ii) The monitoring data collected by the owner or operator of the affected source in accordance with 40 CFR 63.343(c) show that the emission limit has been exceeded, in which case quarterly reports shall be submitted. Once an owner or operator of an affected source reports an exceedance, ongoing compliance status reports shall be submitted quarterly until a request to reduce reporting frequency under 40 CFR 63.347(g)(2) is approved.	40 CFR 63.347(g)
The owner or operator of an affected source for which compliance monitoring is required in accordance with 40 CFR 63.343(c) shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the following information: (i) The company name and address of the affected source; (ii) An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); (iii) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e); (iv) The beginning and ending dates of the reporting period; (v) A description of the type of process performed in the affected source; (vi) The total operating time of the affected source during the reporting period;  (continued)	40 CFR 63.347(g)(3)
(viii) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; (ix) A certification by a responsible official, as defined in 40 CFR 63.2, that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source;  (continued)	40 CFR 63.347(g)(3) (continued)

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

(x) If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; (xi) A description of any changes in monitoring, processes, or controls since the last reporting period; (xii) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and (xiii) The date of the report.	40 CFR 63.347(g)(3) (continued)
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------

## TABLE B: SUBMITTALS

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

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

01/03/02

Facility Name: Vision-Ease Lens - Ramsey  
Permit Number: 00300199 - 003

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

**TABLE B: RECURRENT SUBMITTALS**

01/03/02

Facility Name: Vision-Ease Lens - Ramsey

Permit Number: 00300199 - 003

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
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 US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

**TECHNICAL SUPPORT DOCUMENT**  
**For**  
**AIR EMISSION PERMIT NO. 00300199-003**

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: 3851)
Vision-Ease Lens, Inc. 7100 Northland Circle, Suite 312 Brooklyn Park, Minnesota 55428	7000 Sunwood Drive Ramsey Anoka County, MN

1.2. Description of the facility

The Vision-Ease Lens Ramsey facility is a 150,000 square foot facility that houses manufacturing of polycarbonate ophthalmic lenses, a research and development operation, and a lens distribution center. The manufacturing area operates 24 hours/day, 7 days/week. The production of polycarbonate ophthalmic lenses includes injection molding, scratch-resistant coating, inspection, packaging, and support functions.

Air emissions from the facility result from three types of activities. Minor nickel and chromium emissions are generated from tool plating and repair operations. Natural gas combustion by-products (are generated by boilers and roof top heating units used to heat the facility. Volatile organic compound (VOC) emissions are generated by the application and curing of solvent-based scratch-resistant coatings. The VOCs are primarily alcohols and ketones, including methanol and methyl ethyl ketone which are hazardous air pollutants (HAPs).

1.3. Description of any changes allowed with this permit issuance

The facility is currently operating under a General Manufacturing Permit. Vision-Ease has added a small decorative chromium electroplating operation to the facility. The unit is subject to 40 CFR Part 63, Subpart N, the National Emission Standards for Chromium Emissions from Decorative Chromium Electroplating (Chrome Plating NESHAP). A solvent cleaner, Emission Unit 804, was retired in June 2001.

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
General Permit #00300199-001; September 24, 1996	Operation and Construction
General Permit #00300199-002; January 11, 1999	Operation and Construction

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU #	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
EU800 to EU803	Coaters	-	-	-	-	-	155	73.2	104
EU805	Nickel Strike Tank	0.00	0.00	-	-	-	-	0.26	0.26
EU806	Chrome Flash Tank	0.00	0.00	-	-	-	-	.0024	.0024
EU807 and EU808	Boilers	0.03	0.03	0.003	0.44	0.37	0.024	-	-
EU809 to EU831	HVAC Roof Top Units	0.23	0.23	0.018	2.96	2.49	0.163	-	-
Facility	Facility	-	-	-	-	-	4.37	4.37	4.37

	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Potential Emissions	0.26	0.26	0.02	3.4	2.86	159.5	73.70	109
Total Facility Actual Emissions	-	-	-	0.1	0.1	109.4	55.9	76.49

Table 2. Facility (TF) and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD (PM, PM10, NO <sub>x</sub> , SO <sub>2</sub> , CO, VOC)			X
NAAR			X
Part 70 Permit Program (HAP)	Part 63 Subpart N, Chrome NESHAP		

\* 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

The facility installed a chrome plating operation that is subject to 40 CFR 63, Subpart N. The facility also has a degreasing operation but no halogenated solvents are used.

### Regulatory Overview of Facility

*EU, GRP, or SV #	Applicable Regulations	**Comments:
EU806	40 CFR 63 Subp. N	National Emission Standards for Chromium Emissions from Decorative Chromium Electroplating
EU807 to EU831	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment  Periodic Monitoring: Records of natural gas usage for the particulate matter limit. Due to use of only natural gas the unit is expected to never approach the 20 percent opacity limit and therefore no periodic monitoring is required.
EU800 to EU805	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment.  Periodic Monitoring: The particulate limit is a generous general requirement that applies to all industrial process equipment. These units do not generate particulate matter in any appreciable amounts and therefore periodic monitoring is not required.

### **3. Technical Information**

- Emission calculations are attached

### **4. Conclusion**

Based on the information provided by Vision-Ease, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 00300199-003 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: Greg Kvaal, Robert Berg

Attachment: GI-07