

AIR EMISSION PERMIT NO. 12300410- 001

IS ISSUED TO

Waldorf Corporation

Waldorf Corporation - A Rock-Tenn Company
2250 Wabash Avenue
St. Paul, Ramsey County, MN 55114

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	April 1995
Minor Permit Amendment	March 1996
Minor Permit Amendment	July 1996

This permit authorizes the Permittee to 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; Pt 70/Incorporates Existing NSR Conditions

Issue Date: April 17, 2003

Expiration: April 17, 2008
All Title I Conditions do not expire.

Ann M. Foss
Major Facilities Section Manager
Majors and Remediation Division

for Sheryl A. Corrigan
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:

Waldorf manufactures 100 percent recycled corrugated medium and boxboard at the St. Paul facility. The paper products are manufactured entirely from pre- and post-consumer corrugated board, white paper, newsprint, and boxboard. Some of the boxboard produced is printed using rotogravure or web offset printing. The printed boxboard may also be converted into folding cartons. The printing processes are sources of Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) emissions. The papermaking processes are not a significant source of emissions, except for VOC emissions. The VOC emissions from the papermaking are primarily from material used for cleaning the papermaking machines, as well as from additives added to the paper.

Process steam is purchased and piped from the Xcel High Bridge facility in St. Paul. Some of the purchased steam is used by Waldorf to cogenerate electricity. A steam plant, consisting of four boilers, is operational at Waldorf. The boilers are maintained in a stand-by mode to provide steam in the event that the supply from Xcel is interrupted or discontinued. The boilers are allowed to burn natural gas, #2 or #6 fuel oil. The boilers are sources of particulate matter, nitrogen oxides, sulfur dioxide, carbon monoxide, VOC, and HAP emissions. The actual emissions from the boilers have been very low, as most of the steam utilized by the facility has been purchased rather than produced on-site.

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 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
OPERATIONAL REQUIREMENTS	hdr
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and 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
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
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
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
MODELING REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Modeling Protocol. If the boilers are operated such that the following actual emissions are exceeded: 1000 tons per year of NOx, 250 tpy of SO2, or 100 tpy of PM, then the Permittee shall submit a modeling protocol. This protocol shall describe the proposed modeling methodology and input data, in accordance with MPCA modeling guidance for Title V air dispersion modeling analyses. The modeling protocol shall be submitted within one year of the calendar year in which the thresholds described above are exceeded.	Minn. R. 7007.0800, subp. 2
RECORDKEEPING	hdr
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)
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)
REPORTING/SUBMITTALS	hdr
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
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due 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

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

If applicable, the Permittee is required to submit a Risk Management Plan (RMP) under the federal rule, 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. A complete RMP must be submitted to the RMP Reporting Center, PO Box 3346, Merrifield, VA 22116. RMP submittal information may be obtained at <http://www.epa.gov/swercepp> or by calling 1-800-424-9346. These requirements must be complied with 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.

40 CFR pt. 68

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 001 Boilers

Associated Items: EU 001 Boiler 1

EU 002 Boiler 2

EU 003 Boiler 3

EU 004 Boiler 4

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . This applies separately to each boiler. PTE for the boilers based on worst-case allowable fuels is 0.12 lb/mmBtu.	Minn. R. 7011.0510, subp. 1
Total Particulate Matter: less than or equal to 285 tons/year using 12-month Rolling Average . Limit is for total PM emissions from boilers, as calculated using formula below.	Minn. R. 7009.0080 (State ambient air quality standards as demonstrated by modeling)
$PM = [NG * 0.0072 * HVNG]/2000 + (3.3 * FO2)/2000 + [(9.19*S + 4.72) * FO6]/2000$; where: NG = Total volume of natural gas burned in boilers based on 12-month rolling sum, in units of cf 0.0072 = emission factor for natural gas from AP-42, in units of lb/mmBtu HVNG = Average heating value of natural gas as provided by supplier, in units of mmBtu/cf 2000 = conversion factor, in units of lb/ton 3.3 = emission factor for #2 fuel oil from AP-42, in units of lb/1000 gallons FO2 = Total volume of #2 fuel oil burned in boilers based on 12-month rolling sum, in units of gallons (9.19*S + 4.72) = emission factor for #6 fuel oil from AP-42, in units of lb/1000 gallons S = % sulfur in fuel oil, weight percent FO6 = Total volume of #6 fuel oil burned in boilers based on 12-month rolling sum, in units of gallons	Minn. R. 7009.0080 (State ambient air quality standards as demonstrated by modeling)
Sulfur Dioxide: less than or equal to 1.6 lbs/million Btu heat input . This applies separately to each boiler.	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. This applies separately to each boiler.	Minn. R. 7011.0510, subp. 2
Sulfur Content of Fuel: less than or equal to 0.5 percent by weight for #2 fuel oil.	Minn. R. 7007.0800, subp. 2
Sulfur Content of Fuel: less than or equal to 1.5 percent by weight for #6 fuel oil.	Minn. R. 7007.0800, subp. 2
Fuel Type: Natural gas, No. 2 fuel oil, or No. 6 fuel oil only, by design.	Minn. R. 7005.0100, subp. 35a
MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Emissions Monitoring: The owner or operator shall use a COMS to measure opacity emissions from the boilers.	Minn. R. 7007.0800, subp. 4
Monthly Recordkeeping - Total PM Emissions. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total fuel usage of each fuel used in the boilers for the previous calendar month using the daily usage records. 2) The average heating value, for the previous 12-month period, for each fuel type burned using the data provided by the fuel supplier. 3) The 12 month rolling sum Total PM Emissions for the previous 12 month period using the formula specified in this permit. The Total PM emissions using the formula only needs to be calculated if fuel oil was combusted during the previous month. PTE for the boiler using natural gas shows that the emission limit is met.	Minn. R. 7007.0800, subp. 4 and 5
Fuel Records: 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, and the heating value of the fuel oil, in mmBtu/gal. The Permittee shall also obtain and maintain a certification from the natural gas supplier specifying the heating value of the natural gas, in mmBtu/cf. This information shall be maintained on site.	Minn. R. 7007.0800, subp. 5
Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain records of the total quantity of all fuel used in the boilers.	Minn. R. 7007, subp. 4 and 5
Fuel usage records: the Permittee shall, on a monthly basis, record what boilers were operated during the month and the type of fuel burned and, if fuel oil was burned, the quantity of fuel oil burned, during the month. The Permittee shall also record the volume and type of fuel oils delivered to the facility during the month.	Minn. R. 7007, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 002 Rotogravure Press Operation**Associated Items:** CE 001 Direct Flame Afterburner w/Heat Exchanger

EU 005 Rotogravure Press 2

EU 006 Press 2 Dryer

What to do	Why to do it
VOC Usage: less than or equal to 61.4 tons/month using 12-month Rolling Average . VOC usage rate is determined using recordkeeping and equation in Appendix C.	Title I Condition: 40 CFR Section 52.21(j) (BACT limit); Minn. R. 7007.3000
HAPs - Total: less than or equal to 20 percent of mass of solids applied for the month. This is for total organic HAPs. To meet this limit, the Permittee shall follow the next two requirements:	40 CFR pt. 63.825(b)
The Permittee shall operate and maintain the thermal oxidizer any time that any process equipment controlled by the thermal oxidizer is in operation.	Title I Condition: 40 CFR Section 52.21(j) (BACT); 40 CFR Section 63.825(b)(8); Minn. R. 7007.0800, subp. 2 and 14
HAPs - Total: less than or equal to 0.20 kilograms/kilograms . The Permittee is limited to less than or equal to 0.20 kg organic HAP emitted per kg solids applied as determined on a monthly average as-applied basis.	40 CFR Section 63.825(b)(8); Minn. R. 7007.0800, subp. 2
Determination of Emission Rate: the Permittee shall determine the organic HAP emission rate based on solids applied, using the equations in Appendix C. The Permittee shall measure the mass of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month and shall determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR Section 63.827(b)(2). The Permittee shall also determine the solids content of each ink, coating, varnish, adhesive, primer, solvent, and other material applied during the month following the procedure in 40 CFR Section 63.827(c)(2). The Permittee has chosen to use the formulation data as provided in a Certified Product Data Sheet (CPDS) as obtained from the supplier.	40 CFR Section 63.825(d)(v)
Monitoring Scenarios: The Permittee is authorized to install a new temperature monitoring system that will monitor the 3-hour rolling average temperatures on the thermal oxidizer. Prior to installation of such a system, the Permittee shall comply with and monitor for the absolute minimum temperature limit listed under Scenario 1. After installation of the system, the Permittee shall comply with and monitor for the 3-hour rolling average temperature limit under Scenario 2.	Minn. R. 7007.0800, subp. 11
Notify: due 30 days after Equipment Installation. The Permittee shall notify the MPCA when the installation of the new temperature monitoring system is complete. The notification shall include the date that the Permittee switched to Monitoring Scenario 2.	Minn. R. 7007.0800, subp. 11
MONITORING SCENARIO 1	hdr
Temperature: greater than or equal to 1250 degrees F absolute minimum at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC and/or HAP emissions was demonstrated. If the temperature drops below the minimum temperature limit, the VOC and HAP used during that time shall be considered uncontrolled until the minimum temperature limit is once again achieved. This shall be reported as a deviation. Monitoring and recording of temperature is required only when the emission source venting to the oxidizer is in operation.	40 CFR section 63.825(d)(xi)
MONITORING SCENARIO 2	hdr
Temperature: greater than or equal to 1250 degrees F using 3-hour Rolling Average at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC and/or HAP emissions was demonstrated. If the 3-hour rolling average temperature drops below the minimum temperature limit, the VOC and HAP used during that time shall be considered uncontrolled until the average minimum temperature limit is once again achieved. This shall be reported as a deviation. Monitoring and recording of temperature is required only when the emission source venting to the oxidizer is in operation.	40 CFR section 63.825(d)(xi)
MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Performance Test: due before 03/01/2004 to measure HAPs destruction and collection efficiency of incinerator. This test is to be performed 5 years after initial compliance test for MACT (initial compliance test conducted 3/99).	Minn. R. 7007.0800, subp 4
The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings for the combustion chamber. Once operating under Scenario 2, the Permittee shall also maintain the calculated three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

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Daily Monitoring: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of these checks.	Minn. R. 7007.0800, subp. 4 and 5
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. Under Scenario 2, the recording device shall also calculate the three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5
Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
For periods when the thermal oxidizer is operated above the minimum combustion chamber temperature, the Permittee shall use either one of the following when completing calculations as required elsewhere in this permit: a. The overall control efficiency limit specified in this permit for this equipment (58%); or b. The overall control efficiency determined during the most recent MPCA approved performance test. If the tested efficiency is less than the efficiency limit in this permit, the Permittee must use the tested value in all calculations until the efficiency is demonstrated to be above the permit limit through a new test.	Minn. R. 7007.0800, subp. 4 and 5
Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Hood Certification and Evaluation: The control device hood must conform to the requirements listed in Minn. R. 7011.0070, subp. 1, and the Permittee shall certify this as specified in Minn. R. 7011.0070, subp. 3. The Permittee shall maintain a copy of the certification on site, as well as an annual record of fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method.	Minn. R. 7007.0800, subp. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 003 Web Offset Presses**Associated Items:** CE 002 Direct Flame Afterburner w/Heat Exchanger

EU 007 Web Offset Press 3

EU 008 Press 3 Dryer

EU 009 Web Offset Press 4

EU 010 Press 4 Dryer

What to do	Why to do it
<p>Volatile Organic Compounds: less than or equal to 3.0 tons/month using 12-month Rolling Average to be calculated by the 15th day of each month for the previous 12-month period as described elsewhere and in Appendix C of this permit.</p> <p>VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 006.</p>	<p>Title I Condition: Limit to avoid classification as major modification under 40 CFR Section 52.21</p>
<p>Operating Hours: less than or equal to 8000 hours/year using 12-month Rolling Sum . This limit applies to each press separately.</p>	<p>Title I Condition: Limit to avoid classification as major modification under 40 CFR Section 52.21</p>
<p>The Permittee shall operate and maintain the thermal oxidizer any time that any process equipment controlled by the thermal oxidizer is in operation.</p>	<p>Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>Monitoring Scenarios: The Permittee is authorized to install a new temperature monitoring system that will monitor the 3-hour rolling average temperatures on the thermal oxidizer. Prior to installation of such a system, the Permittee shall comply with and monitor for the absolute minimum temperature limit listed under Scenario 1. After installation of the system, the Permittee shall comply with and monitor for the 3-hour rolling average temperature limit under Scenario 2.</p>	<p>Minn. R. 7007.0800, subp. 11</p>
<p>Notify: due 30 days after Equipment Installation. The Permittee shall notify the MPCA when the installation of the new temperature monitoring system is complete. The notification shall include the date that the Permittee switched to Monitoring Scenario 2.</p>	<p>Minn. R. 7007.0800, subp. 11</p>
<p>MONITORING SCENARIO 1</p>	<p>hdr</p>
<p>Temperature: greater than or equal to 1325 degrees F absolute minimum at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC emissions was demonstrated. If the temperature drops below the minimum temperature limit, the VOC used during that time shall be considered uncontrolled until the minimum temperature limit is once again achieved. This shall be reported as a deviation. Monitoring and recording of temperature is required only when an emission source venting to the oxidizer is in operation.</p>	<p>Title I Condition: Limit taken to avoid classification as a major modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subp. 2 and 14</p>
<p>MONITORING SCENARIO 2</p>	<p>hdr</p>
<p>Temperature: greater than or equal to 1325 degrees F using 3-hour Rolling Average at the Combustion Chamber unless a new minimum is set pursuant to Minn. R. 7017.2025, subp. 3, based on the average temperature recorded during the most recent MPCA approved performance test where compliance for VOC and/or HAP emissions was demonstrated. If the 3-hour rolling average temperature drops below the minimum temperature limit, the VOC and HAP used during that time shall be considered uncontrolled until the average minimum temperature limit is once again achieved. This shall be reported as a deviation. Monitoring and recording of temperature is required only when an emission source venting to the oxidizer is in operation.</p>	<p>40 CFR section 63.825(d)(xi)</p>
<p>MONITORING AND RECORDKEEPING REQUIREMENTS</p>	<p>hdr</p>
<p>Monthly Recordkeeping -- Hours of operation: By the 15th of the month, the Permittee shall calculate and record the following: 1) The total hours of operation for the web presses for the previous calendar month using the daily operation records. 2) The 12 month rolling average of hours of operation for the previous 12-month period by summing the monthly hours of operation data for the previous 12 months.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>The Permittee shall maintain a continuous hard copy readout or computer disk file of the temperature readings for the combustion chamber. Once operating under Scenario 2, the Permittee shall also maintain the calculated three-hour rolling average combustion chamber temperature.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>
<p>Daily Monitoring: The Permittee shall physically check the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of these checks.</p>	<p>Minn. R. 7007.0800, subp. 4 and 5</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	Minn. R. 7007.0800, subp. 4
The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have a margin of error less than the greater of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius. Under Scenario 2, the recording device shall also calculate the three-hour rolling average combustion chamber temperature.	Minn. R. 7007.0800, subp. 4 and 5
Annual Inspections: At least once per calendar year, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	Minn. R. 7007.0800, subp. 4, 5, and 14
Annual Calibration: The Permittee shall calibrate the temperature monitor at least annually and shall maintain a written record of the calibration and any action resulting from the calibration.	Minn. R. 7007.0800, subp. 4, 5, and 14
For periods when the thermal oxidizer is operated above the minimum combustion chamber temperature, the Permittee shall use either one of the following when completing calculations as required elsewhere in this permit: a. The overall control efficiency limit specified in this permit for this equipment (76%); or b. The overall control efficiency determined during the most recent MPCA approved performance test. If the tested efficiency is less than the efficiency limit in this permit, the Permittee must use the tested value in all calculations until the efficiency is demonstrated to be above the permit limit through a new test.	Minn. R. 7007.0800, subp. 4 and 5
Corrective Actions: If the temperature is below the minimum specified by this permit or if the thermal oxidizer or any of its components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the temperature to at least the permitted minimum and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the thermal oxidizer. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the thermal oxidizer in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 004 Paper Machines, Boxboard Mill**Associated Items:** EU 013 CorMed Paper Machine 4

EU 014 CorMed Paper Machine 5

EU 015 Boxboard Mill 1

EU 016 Boxboard Mill 2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn R. 7011.0730 or Minn. R. 7011.0735. This applies separately to each piece of industrial process equipment.	Minn. R. 7011.0710, subp. 1(A)
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 applies separately to each piece of industrial process equipment.	Minn. R. 7011.0710, subp. 1(B)
Periodic Monitoring: the Permittee shall perform proper maintenance of the paper and boxboard machines so as to prevent excessive amounts of particulate matter from being emitted from the associated stack/vents.	Minn. R. 7007.0800, subp. 4

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 005 Direct Heating Equipment**Associated Items:** CE 001 Direct Flame Afterburner w/Heat Exchanger

CE 002 Direct Flame Afterburner w/Heat Exchanger

EU 006 Press 2 Dryer

EU 008 Press 3 Dryer

EU 010 Press 4 Dryer

EU 018 Clay Coater Dryer

EU 019 Web Offset #3 Post-Coater (2 burners)

EU 020 Web Offset #4 Post-Coater

What to do	Why to do it
Fuel Type: Natural gas only, by equipment design, except CE 001, which can also burn #2 fuel oil.	Minn. R. 7005.0100, subp. 35a
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 direct heating equipment.	Minn. R. 7011.0610, subp. 1(A)(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 applies separately to each piece of direct heating equipment.	Minn. R. 7011.0610, subp. 1(A)(2)
Sulfur Dioxide: less than or equal to 1.6 lbs/million Btu heat input This applies separately to each piece of direct heating equipment.	Minn. R. 7011.0610, subp. 2(A)(1)

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: GP 006 All Press Operations Subject to MACT**Associated Items:** CE 001 Direct Flame Afterburner w/Heat Exchanger

CE 002 Direct Flame Afterburner w/Heat Exchanger

EU 005 Rotogravure Press 2

EU 006 Press 2 Dryer

EU 007 Web Offset Press 3

EU 008 Press 3 Dryer

EU 009 Web Offset Press 4

EU 010 Press 4 Dryer

What to do	Why to do it
<p>Monthly Recordkeeping -- VOC Emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <p>1) The total usage of VOC containing materials for the previous calendar month using the material usage records. This record shall also include the VOC and solids contents of each material as determined by the Material Content requirement of this permit.</p> <p>2) The VOC emissions for the previous month using the formulas specified in Appendix C of this permit.</p> <p>3) The 12 month rolling sum VOC emissions for the previous 12 month period by summing the monthly VOC emissions data for the previous 12 months.</p>	Minn. R. 7007.0800, subp. 4 and 5
MACT REQUIREMENTS	hdr
<p>Material Usage Recordkeeping:</p> <p>For ink and other materials used at the presses: The Permittee shall record and maintain the quantity of each ink material dispensed in the press operations; this shall be done using the existing system and shall be done on a per-job basis. For solvent, thinner, reducer, diluent, or other non-solids-containing material used with press operations: The Permittee shall record the amount and type of solvent material, whenever material is dispensed.</p> <p>This shall be based on written usage logs and meter readings. The records shall be sufficient to correlate the material usage with the appropriate press. The records shall be sufficient to correlate the material usage with the appropriate press.</p>	Title I Condition: Monitoring for BACT limit; monitoring for limit to avoid classification as major modification under 40 CFR 52.21; monitoring for MACT limit; Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Recordkeeping - HAP emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the organic HAP emission rate based on solids applied, using the equations specified in Appendix C of this permit. The records shall include the monthly total of organic HAPs applied and monthly total of solids applied. The record shall also include the individual and total HAP contents of each HAP-containing material used in the previous month, as determined by the Material Content requirement of this permit.</p>	40 CFR Section 63.829; Minn. R. 7007.0800, subp. 4 and 5
Material Content: HAPs contents in materials, shall be determined in accordance with 40 CFR Section 63.827(b)(2) and (c)(2). The Permittee may use a certified product data sheet (CPDS) provided by the manufacturer if the manufacturer supplies the information as required in 40 CFR Section 63.827(b)(2)(iii).	40 CFR Section 63.827(b)((2) and (c)(2); Minn. R. 7007.0800, subp. 4 and 5
Prior to construction or reconstruction of an "affected source" under the promulgated MACT standards, the Permittee must apply for and obtain an air emission permit.	40 CFR Section 63.5(b)(3)
At all times the Permittee shall operate and maintain the emission unit subject to the MACT standard and its associated air pollution control equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards.	40 CFR Section 63.6(e)(1)(i)
Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the startup, shutdown, and malfunction plan.	40 CFR Section 63.6(e)(1)(ii)
The Permittee shall prepare and implement a Startup, Shutdown, and Malfunction Plan (SSMP) for each of the emission units subject to Maximum Control Technology Standards by the applicable MACT standard compliance date. The compliance date for Subpart KK was 5/30/99; subpart JJJJ is not yet promulgated. The SSMP is a federally enforceable part of the permit and shall be prepared in accordance with 40 CFR Section 63.6(e)(3) and include requirements specified therein. The SSMP must be located at the plant site and must be kept updated. When the SSMP is updated, the Permittee must keep all previous versions of the SSMP for a period of 5 years. The Permittee must submit the SSMP when required.	40 CFR Section 63.6(e)(3)(i); 40 CFR Section 63.6(e)(3)(v)

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the source in accordance with the procedures specified in the startup, shutdown, and malfunction plan.	40 CFR Section 63.6(e)(3)(ii); 40 CFR Section 63.6(e)(3)(iii)
A written SSMP must contain the minimum of the following information: 1. A procedure that documents how any startup, shutdown, or malfunction event that has occurred will be addressed and documented; 2. Information regarding the operation of the source and its associated pollution control devices during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; and 3. Adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.	40 CFR Section 63.6(e)(3)(vii)
The Permittee shall maintain files of all information required by this part in a form suitable and readily available for expeditious inspection and review. The files should be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. Only the most recent two years of information must be kept on site.	40 CFR Section 63.10(b)(1)
The Permittee shall maintain, at a minimum, the following information in the files: 1) the occurrence and duration of each startup, shutdown, or malfunction of operation; 2) the occurrence and duration of each malfunction of the air pollution control equipment; 3) all maintenance performed on the pollution control equipment; 4) actions taken during periods of startup, shutdown, and malfunction when such actions are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan (SSMP). In this case, the Permittee shall report this action within 2 days of occurrence and follow by a written notification within 7 days of occurrence. 5) all information necessary to demonstrate conformance with the affected source's SSMP and actions taken in accordance with SSMP;	40 CFR Section 63.10(b)(2)
6) each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative; 7) all required measurements needed to demonstrate compliance with a relevant standard; 8) all results of performance test, CMS performance evaluations, and opacity and visible emission observations; 9) all measurements as may be necessary to determine the conditions of performance tests and performance evaluations; 10) all CMS calibration checks; 11) all adjustments and maintenance performed on CMS; 12) any information demonstrating whether a source is meeting the requirements for a waiver of record keeping or reporting requirements under this part; 13) all documents supporting initial notifications and notifications of compliance status.	40 CFR Section 63.10(b)(2)
Startup, shutdown, and malfunction reports shall be submitted only if there is an occurrence of startup, shutdown, or malfunction during the reporting period and shall be delivered or postmarked by the 30th day following the end of each calendar half year.	40 CFR Section 63.10(d)(5)(i)
If the Permittee deviates from the startup, shutdown, and malfunction plan (SSMP) during a startup, shutdown or malfunction, the Permittee shall record the actions taken for that event and report such actions within 2 working days after commencing actions inconsistent with the plan, followed by a letter within 7 working days after the end of the event. The report must contain name, title, and signature of a responsible official who is certifying its accuracy, explaining the circumstances of the event, the reasons for not following the SSMP, and whether any excess emissions and/or parameter monitoring exceedances are believed to have occurred.	40 CFR Section 63.6(e)(3)(iv); 40 CFR Section 63.10(d)(5)(ii)

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: EU 004 Boiler 4**Associated Items:** GP 001 Boilers

SV 002

What to do	Why to do it
Capacity: less than or equal to 232 million Btu's/hour . This is derated heat input used in modeling for PM SIP.	Minn. R. 7009.0080

TABLE A: LIMITS AND OTHER REQUIREMENTS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

Subject Item: EU 017 CorMed Web Welder**Associated Items:** CE 003 Wet Cyclonic Separator - Wet Cyclone
SV 010

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)
Pressure Drop: greater than or equal to 40 inches of water column . This is measure of feed water pressure to the cyclone.	Minn. R. 7007.0800, subp. 4 and 5
MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Control Equipment Monitoring: Observe and record once per operating day, the pressure drop for CE 003 (rotoclone).	Minn. R. 7007.0800, subp. 4 and 5
Control Equipment Monitoring: The Permittee shall visually check proper operation of the rotoclone, through the inspection port, at least once each operating day to verify that the rotoclone is working properly.	Minn. R. 7007.0800, subp. 4 and 5
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Minn. R. 7007.0800, subp. 4 and 5
Corrective Actions: If the monitored parameter is out of the range as described above, the Permittee shall take corrective action as soon as possible. Corrective actions shall return the pressure drop to the specified range and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O&M Plan for the rotoclone. The Permittee shall keep a record of the type and date of any corrective action taken.	Minn. R. 7007.0800, subp. 4, 5, and 14
The Permittee shall operate and maintain the rotoclone at all times that any emission unit controlled by the rotoclone is in operation. The Permittee shall operate and maintain the rotoclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 2 and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored rotoclone is in operation.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
The Permittee shall operate and maintain the rotoclone in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE B: SUBMITTALS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co
Permit Number: 12300410 - 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: ONE TIME SUBMITTALS OR NOTIFICATIONS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Computer Dispersion Modeling Information	due 1,096 days after Permit Issuance. Submit modeling data as specified in MPCA guidance for Modeling Information Requests (for pollutant). This modeling information is for data collection purposes, no modeling analysis is required at this time. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act. This protocol will describe the proposed modeling methodology and input data, in accordance with MPCA modeling guidance for Title V air dispersion modeling analyses.	Total Facility

TABLE B: RECURRENT SUBMITTALS

04/17/03

Facility Name: Waldorf Corp - A Rock-Tenn Co

Permit Number: 12300410 - 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 US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX B

Insignificant Activities and Applicable Requirements

Facility Name: Waldorf Corporation – a Rock-Tenn Company

Permit Number: 12300410-001

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.

The following sources at the Permittee's facility qualify as insignificant activities under Minn. R. 7007.1300, subs. 2, 3 and 4 and are not required to be listed in the permit.

Minn. R. 7007.1300, subp.	Rule Description of the Activity	General Applicable Requirement
3(A)	Fuel use: space heaters fueled by, kerosene, natural gas, or propane. <i>Waldorf has natural gas-fired space heaters</i>	Minn. R. 7011.0515 (PM and opacity)
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>Waldorf has finishing operations that are filtered through an air cleaning system, and vented inside the building.</i>	Minn. R. 7011.0715 (PM and opacity)
3(E)(1)	Gasoline storage tanks. <i>Waldorf has a gasoline storage tank (Tank No. 2) less than 10,000 gallons.</i>	Minn. R. 7011.0715 (PM and opacity)
3(G)	Emissions from a laboratory. <i>Waldorf has analytical and QA/QC laboratories that qualify under this subpart.</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. 7011.0715 (PM and opacity)
3(J)	Fugitive emissions from roads and parking lots.	Minn. R. 7011.0105 (opacity)
4(B)	Emission units with potential emissions of less than 2.28 lb/hr or actual emissions of less than 1.0 lb/hr of PM, PM ₁₀ , NO _x , SO ₂ , and VOCs. <i>Emission units at Waldorf that qualify under this subpart include:</i> <ul style="list-style-type: none">• <i>Fuel oil storage tanks (tank nos. 6, 13, 14, 25)</i>• <i>Lubricating oil storage tank (tank no. 19)</i>• <i>VOC storage tanks (tank nos. 7, 8, 9, 21, 22, 23, 24)</i>• <i>Feedstock paper storage piles and handling</i>• <i>Drum storage of VOC-containing materials</i>	Minn. R. 7011.0715 (PM and opacity)

APPENDIX C

VOC and HAP Calculations

Facility Name: Waldorf Corporation – a Rock-Tenn Company
Permit Number: 12300410-001

Control Equipment Efficiency

$$R = \frac{EF}{100}$$

- R = overall VOC, organic HAP control efficiency, percent
E = organic volatile matter control efficiency of the control device, percent
For CE 001, E = 95 %, or as determined during the most recent MPCA approved performance test
F = organic volatile matter capture efficiency of the control system, percent
For CE 001, F = 61.3 %, or as determined during the most recent MPCA approved performance test
Note: For CE 002, assume EF = 57%, as in Minn. R. 7011.0070 for oxidizer with hood, until determined from MPCA approved performance test.

Calculation of HAP emissions:

$$H = (1 - R) \left[\sum_{i=1}^p \left(C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij} \right) \right]$$

- H = total monthly organic HAP applied, kg
p = the number of different inks, coatings, varnishes, adhesives, primers, and other materials applied in a month.
C_{hi} = organic HAP content of ink or other solids-containing material, i, expressed as a weight-fraction, kg/kg
M_i = mass of ink or other material, i, applied in a month, kg
q = the number of different solvents, thinners, reducers, diluents, or other non-solids-containing materials applied in a month
C_{hij} = organic HAP content of solvent j, added to solids-containing material i, expressed as a weight-fraction, kg/kg
M_{ij} = mass of solvent, thinner, reducer, diluent, or other non-solids-containing material, j, added to solids-containing material, i, in a month, kg

$$L = \frac{H}{\sum_{i=1}^p C_{si}M_i}$$

- L = mass organic HAP emission rate per mass of solids applied, kg/kg
C_{si} = solids content of ink or other material, i, expressed as a weight fraction, kg/kg

Calculation of VOC emissions:

$$V = (1 - R) \left[\sum_{i=1}^p (C_{vi} M_i) \right]$$

V = total monthly volatile organic compounds emitted, kg

p = the number of different inks, coatings, varnishes, adhesives, primers, and other VOC-containing material applied in a month.

C_{vi} = Volatile organic compound content of material used, i, expressed as a weight-fraction, kg/kg

M_i = mass of ink or other material, i, applied in a month, kg

(note: convert V from kg/month to lb/month for comparison to emission limit by multiplying by 2.2 lb/kg)

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 12300410-001

This Technical Support Document (TSD) 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: 2657, 2631)
Rock-Tenn Company P.O. Box 64260 St. Paul, MN 55164 (651) 641-4938	Waldorf Corporation – A Rock-Tenn Company 2250 Wabash Avenue St. Paul, MN 55114 Ramsey County

1.2. Description of the facility

Waldorf manufactures 100 percent recycled corrugated medium and boxboard at the St. Paul facility. The paper products are manufactured entirely from pre- and post-consumer corrugated board, white paper, newsprint, and boxboard. Some of the boxboard produced is printed using rotogravure or web offset printing. The printed boxboard may also be converted into folding cartons. The printing processes are sources of Volatile Organic Compounds (VOC) and Hazardous Air Pollutant (HAP) emissions. The papermaking processes are not a significant source of emissions, except for VOC emissions. The VOC emissions from the papermaking are primarily from material used for cleaning, as well as from additives.

Process steam is purchased and piped from the Xcel High Bridge facility in St. Paul. Some of the purchased steam is used by Waldorf to cogenerate electricity. A steam plant, consisting of four boilers, is operational at Waldorf. The boilers are maintained in a stand-by mode to provide steam in the event that the supply from Xcel is interrupted or discontinued. The boilers are allowed to burn natural gas, #2 or #6 fuel oil. The boilers are sources of particulate matter, Nitrogen Oxides (NO_x), Sulfur Dioxide (SO₂), Carbon Monoxide (CO), VOC and HAP emissions. The actual emissions from the boilers have been low, as most of the steam utilized by the facility has been purchased rather than produced on-site.

1.3. Description of any changes allowed with this permit issuance

Waldorf submitted two minor permit amendment applications after submittal of the Total Facility Part 70 Operating Permit Application. The first application was submitted in March, 1996. This application was to add another stack to the rotogravure press (EU 005) to allow coater emissions to be exhausted to the atmosphere rather than to the thermal oxidizer when water-based coatings are applied. The second application was submitted in July 1996. This application was to add a new coating station and dryer to one of the existing web presses (EU 007). The dryer is a natural gas-fired dryer and is included in GP 005, direct heating equipment. The changes from these amendments are incorporated into this Part 70 permit.

1.4 Air Permit History

Waldorf Corporation is an existing facility with an extensive air emissions permit history. The first air permits were issued by the City of St. Paul, starting in 1972. A brief summary of the permitting history is shown below. Generally, limits from the most current permit have been carried forward to the Part 70 permit. Section 3.1 has a discussion of limits that were amended and updated in the Part 70 permit.

Waldorf Air Permit History

Permit Number	Issuance Date	Activity/Comments
Installation	May 31, 1972	Permit issued from City of St. Paul; for installation of control equipment for semichemical pulping process
Operating	June 21, 1973	Permit issued from City of St. Paul; operating permit for 3 boilers
Installation	August 30, 1973	Permit issued from City of St. Paul; for installation of control equipment for pulping process
87-75-O-1	June 17, 1975	Operation of control equipment (odor scrubber) for digesters
87A-79-I-2	January 18, 1979	Installation of rotogravure printing press with thermal oxidizer
87A-79-I-3	November 14, 1979	Installation of paper-trim collection system and dust collector
87-79-OT-1	December 4, 1979	Operating permit for facility. Semi-chemical pulping facility
87-79-OT-1, Amendment No. 1	August 11, 1982	Amendment to allow burning of waste oil in boilers 1, 2, 3, 4
87A-86-OT-1	July 25, 1986	Operating permit for facility.
87A-86-OT-1, Amendment No. 1	April 27, 1988	Changed description of boilers.
87A-94-OT-2	April 26, 1994	Operating permit for facility. Fruehof building demolished and land sold, much equipment dismantled or sold. Hours of operation and solvent usage limitations for web offset presses increased. Extension of commencement of construction for press no. 5, which had previously been permitted but not yet built.

1.5. Facility Emissions:

Table 1. Total Facility Limited Potential to Emit Summary:

GP/ EU/ SV No.	Emission Unit Description	PM tpy	PM₁₀ tpy	SO₂ tpy	NO_x tpy	CO tpy	VOC tpy	All HAPs tpy
GP 001	Boilers	285	285	3970	1056	269	17.6	6.1
GP 002	Rotogravure Press	0	0	0	0	0	310	310
GP 003	Web Offset Presses	0	0	0	0	0	36	10
GP 004	Paper Machines, Boxboard Mill	0	0	0	0	0	1945	16
GP 005	Direct Heating Equipment	1.7	1.7	11	19	16	1.0	0.36
EU 017	Web Welder	3.0	3.0	0	0	0	0	0

	PM tpy	PM₁₀ tpy	SO₂ tpy	NO_x tpy	CO tpy	VOC tpy	Total HAPs
Total Facility Limited Potential Emissions	290	290	3980	1080	285	2310	340
Total Facility Actual Emissions	0.33	0.33	0.03	4.3	3.6	1220	210

Table 2. Facility (TF) and Permit Classification

Classification	Major Source	*Synthetic Minor	*Minor
Prevention of Significant Deterioration	PM, PM ₁₀ , NO _x , SO ₂ , VOC, CO		
Nonattainment Area Review	NA	NA	NA
Part 70 Permit Program	PM, PM ₁₀ , NO _x , SO ₂ , VOC, CO		
Part 63 National Emissions Standards for Hazardous Air Pollutants (NESHAP)	X		

* Refers to potential emissions that are less than those specified as major by 40 CFR § 52.21, 40 CFR pt. 51 Appendix S, 40 CFR pt. 70, and 40 CFR pt. 63.

2. Regulatory and/or Statutory Basis

Table 3. Regulatory Overview of Facility

EU, GP, or SV #	Applicable Regulations	Comments:
GP 001 (Boilers)	Minn. R. 7008.0080	State Ambient Air Quality Standards. PM is limited to meet SIP requirements, as per modeling.
	Minn. R. 7011.0510	Standards of Performance for Existing Indirect Heating Equipment.
GP 002	40 CFR pt. 63, subp. KK	NESHAP for Printing and Publishing Industry. HAP limits and control equipment requirements for rotogravure press operation
	40 CFR § 52.21(j) Minn. R. 7007.3000	PSD. BACT limit for VOCs.
GP 003	40 CFR § 52.21	PSD. Limits taken to avoid major modification classification under PSD. Limits on VOC emissions and operating hours; requirement to operate control equipment.
GP 004	Minn. R. 7011.0710	Standards of Performance for Pre-1969 Industrial Process Equipment.
GP 005	Minn. R. 7011.0610	Standards of Performance for Direct Heating Equipment. Fuels limited to natural gas, except for CD 001, which can also burn #2 fuel oil.
EU 004	40 CFR § 52.21	Boiler derated as part of PSD analysis.
EU 017	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment.

3. Technical Information

3.1 Discussion of Previous Permit Limits

There are some limits in previous permits that were amended or not carried forward to the Part 70 permit. These changes are discussed below.

The previous facility permit had Particulate Matter (PM) limit of 0.2 lb/mmBtu for the boilers. However, the PTE using old – and new – AP-42 emission factors (using %S limit on fuel oil) is less than the 0.2 lb/mmBtu limit. Therefore, this limit isn't needed; the Minn. R. limit of 0.4 still applies, however, as does the total PM emission limit.

The previous permit had VOC emission limit of 4 lb/hr for GP 003 (web offset presses). This limit was set mainly because VOC emissions were presumed to be condensable particulates, and the particulate emissions were to be limited based on SIP modeling previously performed for the facility. However, VOC emissions from oxidizers used for printing presses are no longer counted as condensable particulates. Therefore, the VOC emissions do not need to be set to limit

the particulate emissions. However, VOC emissions from GP 003 should be limited to ensure that the addition of these emission sources would remain synthetic minor for Prevention of Significant Deterioration (PSD). This current permit limits the VOC emissions from GP 003 to 9 lb/hr, and keeps the 8000 hr/yr operation limit, resulting in Potential to Emit (PTE) of 36 tpy.

VOC emissions from the paper machines and boxboard machines were not considered as condensable particulates. The relatively low temperatures as well as the type of chemicals used are such that there will not be condensable particulate emitted from these emission units.

3.2. Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a Facility to have sufficient knowledge of the Facility to certify that the Facility is in compliance with all applicable requirements. In evaluating the monitoring included in the permit for the remaining applicable requirements, the Minnesota Pollution Control Agency (MPCA) considered the following:

- the initial compliance method;
- the format of the applicable requirement;
- the likelihood of violating the applicable requirement;
- whether add-on controls are necessary to meet the emission limit;
- the variability of emissions over time;
- the type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- the technical and economic feasibility of possible periodic monitoring methods; and
- the kind of monitoring found on similar units.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Emission Units Subject to Periodic Monitoring

EU/ GP/ CE	Emission limit (Basis)	Additional Monitoring	Discussion
GP 001: PM limit	<p>PM \leq 285 tons per year, on a 12-month rolling basis (limit set due to PM SIP modeling)</p> <p>PM: \leq 0.4 lb/mmBtu</p> <p>Opacity: \leq 20 % with exception (Minn. R. 7011.0510)</p> <p>SO₂: \leq 1.6 lb/mmBtu;</p> <p>Sulfur Content of Fuel Oil \leq 0.5% by weight for #2, \leq 1.5% for #6</p>	<p>Recordkeeping: Monthly records of fuel usage; fuel purchase records</p> <p>COMS</p> <p>Fuel certification</p>	<p>Permittee purchases steam and currently only needs boilers for backup purposes. Actual usage of boilers, and thus actual emissions of PM has been very low. Permittee will be required to do daily fuel usage requirements; this, along with monthly calculations is sufficient monitoring.</p> <p>Design based PTE for each unit, using AP-42, is less than rule limit of 0.4 lb/mmBtu. Boilers are equipped with COMS; however, the COMS are not capable of undergoing calibration, etc. required under MN rules. Currently boilers are used only as backup; also the boilers are not subject to NSPS, so upgrade of COMS is not required.</p> <p>Sulfur content of #6 fuel oil is limited to ensure that state SO₂ limit is met. Sulfur limit for #2 fuel oil results in SO₂ emissions much less than limit. Fuel certification records are adequate for periodic monitoring.</p>
GP 002 (Rotogravure Press Operation)	<p>VOC usage: \leq 61.4 tons/month (BACT limit)</p> <p>Total HAPs: \leq 20% of mass of solids applied, on monthly basis (MACT limit) – This is met by:</p> <p>Total HAPs \leq 0.20 kg organic HAP/kg solids applied</p>	<p>Recordkeeping: records of VOC and HAP containing material usage kept on a per-job basis; On-going MSDS records of coating contents; Monthly calculations of usage, emissions. (see GP 006)</p>	<p>MACT limit for HAPs is set on a monthly basis by rule, so it is reasonable that VOC limit is also calculated on a monthly basis. Recordkeeping on a per-job basis rather than on a daily basis is required for this permit. The Permittee currently tracks material usage this way (for other purposes), and it will be more precise as well as more efficient to utilize this existing method. The jobs last from 8 hours to 10 days.</p>

	And by operation of oxidizer: Temperature limit \geq 1250 °F at the combustion chamber and by:	Temperature monitoring, Recordkeeping, O & M, inspections	Currently, the Permittee does not have the capability to monitor the 3-hour rolling average temperature and must use the absolute minimum option (e.g., any temperature below the 3-hour tested average is considered a deviation). This unit was tested in 1999 for MACT compliance and showed approx. 95% destruction efficiency at 1250 °F and collection efficiency of 61%. Permit requires additional test in 2004, 5 years after initial compliance test.
GP 003: Web Offset Presses	VOC: \leq 2.76 tons/month (limit to keep modification synthetic minor for PSD) Temperature limit \geq 1325 °F at the combustion chamber	Recordkeeping: Daily records of VOC containing material usage; On-going MSDS records of coating contents; Monthly calculations of emissions. (see GP 006) Temperature monitoring, Recordkeeping, O & M, inspections	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance.
GP 004 (Paper Machines, Boxboard Mill)	PM: \leq variable depending on airflow Opacity: \leq 20 % (Minn. R. 7011.0610)	None	These types of machines by their nature do not generate particulate emissions. Performance of proper maintenance is sufficient to ensure minimal amounts of particulate.
GP 005 (Direct Heating Equipment)	PM: \leq variable depending on airflow SO ₂ \leq 1.6 lb/mmBtu Opacity: \leq 20 % with exception (Minn. R. 7011.0610)		All EU in this group, except for CE 001, use natural gas. CE 001 uses No. 2 Fuel Oil as backup. Therefore, the likelihood of violating either of the emission limits is very small. The Permittee can demonstrate that these units will continue to operate such that emissions are well below the emission limits by burning only these fuels. PTE using AP-42 is less than limits.

	Fuel limited to natural gas and, No. 2 Fuel Oil (for CE 001 only), by design Sulfur Content of Fuel Oil $\leq 0.5\%$ by weight	Fuel purchase records. Fuel certification	Fuel certification records are adequate for periodic monitoring.
GP 006 (All Press Operations)		VOC and HAP recordkeeping and calculation requirements are placed at this group	Currently, only rotogravure press operations (GP 002) are subject to MACT. However, web offset press operation (GP 003) will be subject to MACT in the future. Requirements for recordkeeping and calculations, as well as MACT general provisions, should be the same for both.
EU 004 (Boiler 4)	Derated capacity: ≤ 232 mmBtu/hr	Recordkeeping and calculations as specified under GP 001.	Fuel usage recordkeeping and calculations (under GP 001) sufficient to show that derated capacity remains within limit.
EU 017 (CorMed Web Welder)	PM: \leq variable depending on airflow Opacity: $\leq 20\%$ Pressure drop across wet cyclone ≥ 40 inches W.C.	Pressure drop monitoring, visual check of cyclone through inspection ports; Recordkeeping, O & M, inspections	Check of pressure drop and visual inspection are used to verify that the wet cyclone is functioning properly. Daily check as specified in permit is sufficient.

3.3. Deviations from Delta Guidance

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

Appendix B is a listing of the Facility's Insignificant Activities and their applicable requirements. This is a fairly standard way to include these in the permit, since it is highly unlikely the MPCA would need to have these as trackable items in Delta.

Appendix C contains the specific calculation procedures for VOC and HAP emissions. These procedures are too complex to enter into Delta and must go in an Appendix.

Another area where the permit deviates from guidance is in the use of groups for requirements that apply to individual pieces of equipment. This is done in order to streamline the permit.

4. Public Comments

After the public comment period, Justin Eibenholz from Southeast Como Improvement Association in Minneapolis (SECIA) called and said that he did not receive the public notice. It was explained to him that his group was not on the mailing list, and that therefore they did not receive the notice. However, it was suggested that although it was past the public comment period that he could send comments to either the MPCA or to U.S. Environmental Protection Agency (EPA), since the permit had been sent to EPA for the EPA 45-day review period. The MPCA indicated that we would listen to his comments and take appropriate action. Justin Eibenholz then sent a letter to EPA dated December 17, 2002 stating that an error had been made in the public noticing process, and asked that the public comment period be extended. Many groups and people were cc'd on the letter, including other neighborhood groups and city council people. The MPCA held a meeting with Justin and others on January 16, 2003 to answer any questions that they may have regarding the air permit for Waldorf. Since the public noticing procedure was followed correctly, the MPCA did not extend the public comment period. EPA was kept informed of the proceedings. Further details are included in an attachment to this document.

5. Conclusion

Based on the information provided by Waldorf Corporation, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 12300410-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: Paula Connell, Robert Berg

Peer Review: Peggy Bartz

Attachment: CD-01 Forms
Facility Description Forms
Calculations

Attachment

Detailed explanation and sequence of events re. request for extension of public notice:

- Title V permits are placed on a 30-day public notice. A public notice is developed and published in a newspaper (in this case the St. Paul Pioneer Press), posted on the MPCA website, and mailed out to interested parties who have requested in writing pursuant to Minn. R. 7001.0200 to be on the mailing list. The mailing list is maintained on a county basis, and for different types of activities (e.g. air permits, air rulemaking, etc.). For the Waldorf permit, MPCA sent individual notices to interested parties on the Ramsey County list. During the public comment period, interested parties may comment on the permit, request an extension of the comment period, request an information meeting, request a contested case hearing, and request that the permit be considered by the MPCA board. Following the 30-day public notice period, the permit is sent to EPA for their 45-day review. If no comments were received during the 30-day period, an e-mail and letter are sent to EPA immediately after the 30-day period. If comments were received, these are resolved prior to beginning the 45-day EPA review.
- There were several individuals representing communities and interest groups that commented on this permit after the end of the public comment period. Staff consulted with EPA and with AG staff regarding how to respond to these comments. The following is a summary of our responses. Both EPA and AG staff agreed that these have been appropriate responses:
 - On December 12, 2002, Justin Eibenholz from Southeast Como Improvement Association in Minneapolis (SECIA) called and said that he did not receive the public notice. It was explained to him that his group was not on the mailing list, and that therefore they did not receive the notice. However, it was suggested that although it was past the public comment period that he could send comments to either the MPCA or to EPA, since the permit had been sent to EPA for the EPA 45-day review period. We indicated that we would listen to his comments and take appropriate action. Justin Eibenholz then sent a letter to EPA dated December 17, 2002 stating that an error had been made in the public noticing process, and asked that the public comment period be extended. Many groups and people were cc'd on the letter, including other neighborhood groups and city council people. Carolina Schutt called Robert Miller with EPA and provided him with our explanation of events. We agreed to keep EPA posted regarding the outcome of our response.
- Paula Maccabee, Sierra Club, also called MPCA on December 30, 2002 and January 3, 2003 and said that the Sierra Club Air Toxics campaign did not receive notice and asked to have the public comment period extended. Paula also asked, via e-mail, several questions about the permit. Paula Maccabee was contacted and told that the public notice was sent to Sierra Club. In spite of the extemporaneous comments MPCA agreed to set up a meeting with Paula Maccabee and other interested parties to discuss Waldorf's permit. Others were also invited to the meeting.
- On January 6, 2003 Mark Ten Eyck with the Clean Air Minnesota project called about this permit notice process and about concerns raised to them by the Sierra Club and indicated that the Clean Air Minnesota supported an informal meeting including interested parties (i.e. the Sierra Club, neighborhood organizations, City of St. Paul, Jane Prince - legislative aide to St. Paul Councilmember Jay Benanav) and Waldorf to discuss possible voluntary emission reduction projects.

- St. Anthony Park Community Council (SAPCC) sent a letter dated January 14, 2003 to MPCA requesting that the public notice period be extended.
- Paul Zerby, Minneapolis City Councilmember, sent a letter dated December 27, 2002 to EPA in support of SECIA's request for a new comment period.
- Waldorf Corp. met with Paula Maccabee and Justin Eibenholz on January 14, 2003 to discuss the facility and possible pollution reduction steps that could be taken. Waldorf has joined the Clean Air Minnesota campaign and have identified efforts that they have taken, as well as others that are potential future steps, to reduce their VOC emissions and other environmental impacts.
- On January 16, 2003, a meeting was held at MPCA with Justin Eibenholz, Paula Maccabee, Jane Prince (legislative aide to St. Paul Councilmember Jay Benanav), Paul Zerby, Karen Weiblen (SAPCC). Steve Haselmann and Mike Krautkremer from Waldorf were also present. Anne Holzman from the St. Anthony Park Bugle attended. Carolina Schutt and Paula Connell represented the MPCA.
- Paula Maccabee, Sierra Club, sent a letter, dated January 30, 2003, to EPA, asking that EPA request the MPCA to extend the public comment period for the Waldorf permit, and to improve the process of notification of public noticing, in general. Sierra Club also wants the MPCA to modify the Waldorf permit by including permit conditions to require Waldorf to reduce their VOC emissions.

Issues raised:

- Justin Eibenholz alleged that public notices were not sent to SECIA, and other neighborhood associations. Many feel that the public noticing process was not properly followed, and therefore the public notice period should be re-opened.
- Paula Maccabee stated that Waldorf emits a high quantity of VOCs, and the metro area is close to being non-attainment for ozone. Therefore, limits should be placed on Waldorf to require them to reduce their VOC emissions. Also, the goals that Waldorf has established and is willing to do on a voluntary basis should be placed in the permit.
- Paula Maccabee alleged that the emissions total for HAPs for actual emissions as reported in the public notice and in the technical support document (TSD) are apparently not accurate compared to the chemicals Waldorf is currently using. Therefore, the contention was made that the permit is inaccurate.
- Waldorf indicated that they would resist any attempt to include as a permit condition any voluntary emission reduction goal or project. Waldorf indicated that these projects are complex and they need the flexibility to experiment and adjust approaches in a manner that does not impede their ability to produce and remain competitive.
- MPCA explained that the largest contributors of VOC emissions are not stationary sources such as Waldorf. Therefore, in considering the comments from the Sierra Club and neighborhood organizations, the Agency needs to decide whether or not it is good public policy and air resource management strategy to exert our statutory authority and begin implementing further reduction of VOC emissions through individual operating permits for stationary sources in a system where stationary sources are not the main contributors and where over 70% of the permits have already been issued for the present generation of Title V permits. In this case, Waldorf is already committed to do what they can to reduce VOCs, and therefore, imposing permit conditions are not likely to result in any additional reductions.

