

**AIR EMISSION PERMIT NO. 05300405- 001**

**IS ISSUED TO**

**WALTER G. ANDERSON, INC.**

4535 Willow Drive

Hamel, Hennepin County, Minnesota 55340

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	February 20, 1997
Major Amendment	July 6, 1998

This permit authorizes the Permittee to operate and modify 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, not pre-authorized in this permit, 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:** November 12, 1998

**Expiration:** November 12, 2003  
All Title I Conditions do not expire.

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Michael J. Sandusky  
Division Manager  
Air Quality Division

for Peder A. Larson  
Commissioner  
Minnesota Pollution Control Agency

JP:lao

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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. Certain requirements which have been determined not to apply are listed in Table A of this permit.

The permit shield, however does not apply to:

1. Any national ambient air quality standards adopted under section 109 of the Clean Air Act or increment or visibility under Part C of Title I of the Clean Air Act,
2. Any state ambient air quality standard under Minn. R. ch. 7009, and
3. The state noise pollution control rules, Minn. R. ch. 7030.

**FACILITY DESCRIPTION:**

The Permittee prints paperboard and converts some of the printed material to folding cartons. The plant currently operates three sheet-fed, offset lithographic presses using non-heatset printing techniques. Two of the three presses have aqueous coaters and infrared dryers; the third press is not equipped with a coating station. Scrap cuttings are ducted internally to a unit that bales the material which is vented internally and is an insignificant activity. With this permit, the Permittee obtains authorization to install a new press to eventually replace an aging existing press. The draft permit includes a total facility limit on the usage of volatile organic compounds and hazardous air pollutants, and provisions pre-authorizing the addition and replacement of similar equipment as long as the permit limits are still met.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

11/12/98

Facility Name: Walter G Anderson Inc

Permit Number: 05300405 - 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**

<b>What to do</b>	<b>Why to do it</b>
This permit establishes limits on the facility to keep it a nonmajor source under 40 CFR Section 52.21 and Minn. R. 7007.3000, and 40 CFR Section 63.2 and Minn. R. 7011.7000. The Permittee cannot make any change at the facility that would make it a major source under 40 CFR Section 52.21 and Minn. R. 7007.3000, or 40 CFR Section 63.2 and Minn. R. 7011.7000 until a permit amendment has been issued.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
This permit preauthorizes the modification, replacement, or addition of new emission units similar to those in GP 001 as long as the requirements of GP 001 are met. The Permittee cannot make any change which would be subject to a New Source Performance Standard (NSPS) under 40 CFR pt. 60 or a National Emission Standard for Hazardous Air Pollutants (NESHAP) under 40 CFR pt. 63 until a permit amendment has been issued.	Minn. R. 7007.0800, subp. 2
Insignificant Activities (not associated with GP 001): The Permittee shall evaluate the emissions from changes made under Minn. R. 7007.1300 on a monthly basis. The Permittee shall not make any change that causes emissions to exceed permit thresholds in Minn. R. ch. 7007 without first obtaining a major permit amendment.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
Record keeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
Record keeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original 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)
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)
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

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

11/12/98

Facility Name: Walter G Anderson Inc

Permit Number: 05300405 - 001

Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
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
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not federally enforceable.	Minn. R. 7030.0010 - 7030.0080
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
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
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

11/12/98

Facility Name: Walter G Anderson Inc

Permit Number: 05300405 - 001

**Subject Item:** GP 001 Facility-wide VOC- and HAP-containing material usage

**Associated Items:** EU 001 41" 6 color press (6-41-P)

EU 002 55" 6 color press (6-55-P)

EU 003 55" 7 color press (7-55-P)

EU 004 51" 7 color press (7-51-P)

EU 005 Future Presses

FS 001 Clean-up solvent usage

FS 002 Other miscellaneous VOC- and HAP-containing material usage

What to do	Why to do it
The Permittee may replace or move listed emission units, or add new emission units similar to those listed in GP 001 and add, replace or change associated stacks. All changes must meet the requirements for GP 001.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
VOC Usage: less than or equal to 200 tons/year using 12-month Rolling Sum to be calculated and recorded by the 15th day of each month for the previous 12-month period. Monthly volatile organic compound (VOC) usage shall be calculated by summing the total-facility usage of each VOC-containing material, multiplied by the VOC content of the material. The 12-month rolling sum shall be calculated by totaling each of the monthly VOC usages for the previous 12 consecutive months. All emission units or other activities added to GP 001, as pre-authorized by this permit, shall be included in this calculation. VOC content for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of VOC usage may reflect the VOC content of waste as quantified according to this permit.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
HAP-Single: less than or equal to 9 tons/year using 12-month Rolling Sum to be calculated and recorded by the 15th day of each month for the previous 12-month period. Monthly single hazardous air pollutant (Single HAP) usage shall be calculated by summing the total-facility usage of each HAP-containing material, multiplied by the Single HAP content of the material. The 12-month rolling sum shall be calculated by totaling each of the monthly Single HAP usages for the previous 12 consecutive months. All emission units or other activities added to GP 001, as pre-authorized by this permit, shall be included in this calculation. Single HAP content for each HAP-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of Single HAP usage may reflect the HAP content of waste as quantified according to this permit.	Limit to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
HAPs - Total: less than or equal to 24 tons/year using 12-month Rolling Sum to be calculated and recorded by the 15th day of each month for the previous 12-month period. Monthly total hazardous air pollutant (Total HAP) usage shall be calculated by adding the monthly usage of each Single HAP calculated for the month. The 12-month rolling sum shall be calculated by totaling each of the monthly Total HAP usages for the previous 12 consecutive months. All emission units or other activities added to GP 001, as pre-authorized by this permit, shall be included in this calculation. The calculation of Total HAP usage may reflect the HAP content of waste as quantified according to this permit.	Limit to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
Material Content: VOC and HAP content of VOC- and HAP-containing materials (e.g., inks, coatings, clean-up solvents, etc.) shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all calculations. Other alternative methods approved by the MPCA may be used to determine the VOC and HAP content. The MPCA reserves the right to require the Permittee to determine the VOC and HAP content of any material according to EPA reference methods. If an EPA reference method is used for material content determination, the data obtained shall supersede the MSDS.	Title I Condition: Monitoring for limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
The Permittee may choose to track and record the VOC- and HAP-containing materials used at the facility described under GP 001 which leave the facility as waste. These materials shall be stored in a central area. Each container of waste shall be accompanied by a breakdown of the composition of the waste obtained from MSDSs and a material balance if raw materials are mixed, or waste stream profiles obtained by EPA reference methods. The breakdown or profile shall include the VOC content and the content of each HAP. The VOC and HAP leaving the facility with waste shall be calculated on a monthly basis by multiplying the quantity of each type of waste by the VOC and HAP content, and summing the total. The VOC and HAP in waste may be subtracted from the monthly usage in calculating the monthly VOC, Single HAP, and Total HAP 12-month rolling sums.	Title I Condition: Monitoring for limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

11/12/98

Facility Name:       Walter G Anderson Inc  
Permit Number:     05300405 - 001

Records of all VOC- and HAP-containing materials used at the facility shall be maintained in a central location at the facility.	Title I Condition: Monitoring for limit to avoid classification as major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR Section 63.2 and Minn. R. 7011.7000
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## TABLE B: SUBMITTALS

11/12/98

Facility Name: Walter G Anderson Inc  
Permit Number: 05300405 - 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



**TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS**

11/12/98

Facility Name:       Walter G Anderson Inc  
Permit Number:     05300405 - 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

**TABLE B: RECURRENT SUBMITTALS**

11/12/98

Facility Name: Walter G Anderson Inc

Permit Number: 05300405 - 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.	Total Facility
Annual Report	due 30 days after end of each calendar year following Permit Issuance. The Permittee shall submit an annual report by January 30 that describes the changes made at the facility during the previous calendar year, using the latest MPCA application forms. The report shall document the VOC, Single HAP, and Total HAP 12-month rolling sum calculations for the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained nonmajor source status under 40 CFR Section 52.21 and Minn. R. 7007.3000, and 40 CFR Section 63.2 and Minn. R. 7011.7000.	GP001
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604.	Total Facility
Emissions 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.	Total Facility

**TECHNICAL SUPPORT DOCUMENT  
FOR  
AIR EMISSION PERMIT NO. 05300405-001  
WALTER G. ANDERSON, INC.  
AQD File No. 3823**

The purpose of this Technical Support Document (TSD) is to set forth the legal and factual basis for the 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
Leo Bacik Walter G. Anderson, Inc. 4535 Willow Drive Hamel, Minnesota 55340 (651)478-2133	(Same)

1.2. Description of the facility

The Permittee prints paperboard and converts some of the printed material to folding cartons. The plant currently operates three sheet-fed, offset lithographic presses using non-heatset printing techniques. Two of the three presses have aqueous coaters and infrared dryers; the third press is not equipped with a coating station. Scrap cuttings are ducted internally to a unit that bales the material which is vented internally, and is an insignificant activity. With this permit, the Permittee obtains authorization to install a new press to eventually replace an aging existing press. The draft permit includes a total facility limit on the usage of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), as well as provisions to pre-authorize the addition and replacement of similar equipment as long as the permit limits are still met.

1.3. Description of any changes allowed with this permit issuance

When submitting its Part 70 total facility operating permit (TFP), the Permittee indicated the potential need to submit a modification application prior to its issuance. This, in fact, occurred and the Permittee requested that the modification be handled with the issuance of the TFP. The main reason for this is that the Permittee desires a facility-wide limitation to keep the modification and the facility, as a whole, classified as nonmajor for the federal New Source Review (NSR) / Prevention of Significant Deterioration (PSD) program (for VOCs by a usage limit). The Permittee also seeks flexible-cap provisions in the permit to pre-authorize the type of equipment replacements and process changes reflected by the present modification (installation of a new press to eventually replace an aging press after a suitable transition period).

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

The Permittee has never previously obtained an air quality permit for this facility.

(As the facility was first established in 1985 and underwent a handful of press additions/replacements, at some point in the past it most likely should have applied for a synthetic minor permit due to potential VOC emissions exceeding the 250 ton/yr NSR/PSD major source threshold. The Permittee acknowledged this in its application. The potential past violation was discussed, in general terms, during the permit negotiations. Because, in part, current actual emissions for the facility (which has grown over time) are approximately 125 ton/yr, it is believed that actual emissions have never exceeded the major source threshold. In addition, the Permittee's Part 70 operating permit application on file was submitted late -- February 20, 1997, vs. April 15, 1995). Issuance of the permit brings the facility back into compliance with the requirement to have the proper permit; therefore a compliance schedule is not included in the permit. The appropriate enforcement followup will be taken after permit issuance.)

1.5. Facility Emissions:

Table 1. Emissions Summary

Emission Unit Description	PM tpy	PM <sub>10</sub> tpy	SO <sub>2</sub> tpy	NO <sub>x</sub> tpy	CO tpy	Lead tpy	VOC tpy	Single HAP tpy	Total HAPs tpy
Facility-Wide Potentials	--	--	--	--	--	--	< 200 *	< 10	< 25
Facility-Wide Actuals ***	--	--	--	--	--	--	127	2.2 **	3.6

\* Reflects facility-wide VOC permit limit such that stationary source is classified as nonmajor for PSD.

\*\* Number indicated is that for the Single HAP with highest actual emissions, glycol ethers

\*\*\* Actuals for June 1997 - May 1998

Table 2. Facility and Permit Classification

Classification	Major	Synthetic Minor*	Minor*
PSD (Syn. minor for VOCs, true minor for rest)		X	
NAAR (CO)			X
Part 70 Permit Program (VOCs; syn. area source for HAPs)	X		

\* 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. Summary of Regulatory and/or Statutory Basis

EU, GP, or SV	Applicable Regulations	Comments:
GP 001 (and FC)	Title I Condition, 40 CFR § 52.21; 40 CFR pt. 63.2	Facility-wide VOC and HAP limits taken by Permittee so that facility is classified as nonmajor, with now-customary flex-cap provisions (adapted from guidance and previous permits) to allow certain modifications beneath the cap.
		Other than the usual generic requirements, no applicable requirements pertain to this facility. The facility is not subject to any existing or scheduled forthcoming 40 CFR pt. 63 NESHAP, and in addition has accepted limits to be a synthetic area source for HAPs (possible due to pollution prevention efforts) to avoid being subject to any potential subsequent major source NESHAP. (The NESHAP and NSPS for the printing industry, 40 CFR pt. 63, subp. KK, and 40 CFR pt. 60, subp. QQ, respectively, are aimed at the publication industry using the rotogravure process. The Permittee submitted an explanation of how its process differs from those covered by these regulations.)

## 3. Additional Information

As with most VOC sources of this type, a 12-month rolling sum (vs. a 365-day rolling sum) is appropriate. The VOC and HAP usage will be tracked based on purchase records which are optimally tracked on a monthly basis. A 365-day rolling sum would offer no additional accuracy because of the lag time between receiving the material and using it.

It may be worth pointing out that some Part 70 flex cap permits contain a provision concerning the preparation of an environmental assessment worksheet (EAW) and obtaining a permit amendment for construction of single or phased projects if the total increase in actual emissions is greater than 99 ton/yr for any pollutant. In the case of this permit, as contemplated in the flex-cap permit guidance, this provision is not needed given the VOC actual emissions and permit limit (i.e.,  $200 - 125 = 75 < 99$ ).

Strictly speaking the state industrial process equipment rule (in Minn. R. ch. 7011) can be considered to apply to the various press stacks, but -- for all intents and purposes -- negligible particulate matter is vented as a result of the facility's process (e.g., no combustion, etc.). It, perhaps, could have been added at the group or facility level but it would have been unnecessarily cumbersome. Should there ever be an unforeseen problem, the requirement applies regardless, and could be enforced since it is not covered by the permit shield.

#### **4. Conclusion**

Based on the information provided by the Walter G. Anderson, Inc. the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05300405-001, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

[No public comments were received during the 30-day public comment period and EPA did not comment during its additional 45-day review period either.]

Staff Members on Permit Team: Jeff Peltola, permit engineer, and Bob Beresford and Jennifer Tschida, compliance and enforcement.

Attachments:

Emissions Calculations/Summaries

Facility Description Information