

AIR EMISSION PERMIT NO. 08500047- 001

IS ISSUED TO

USA Waste Services, Inc.

Waste Management - Spruce Ridge
12755 137th Street
Glencoe, McLeod County, MN 55336

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	06/14/1996
Minor Amendment	06/12/1996
Total Facility Supplement	04/15/2002

This permit authorizes the permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/True Minor for NSR

Issue Date: March 21, 2005

Expiration: March 21, 2010

All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

RJS/DB:lh

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NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. chs. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

FACILITY DESCRIPTION:

This facility is a municipal solid waste landfill with a design capacity greater than 2.5 million megagrams and greater than 2.5 million cubic meters and with estimated nonmethane organic compound emissions less than 50 megagrams per year for the term of this permit. This facility first accepted MSW in 1970 and thus is subject to Minnesota's standards of performance for existing landfills, Minn. R. 7011.3500 – 7011.3510.

TABLE A: LIMITS AND OTHER REQUIREMENTS

03/21/05

Facility Name: Waste Management - Spruce Ridge

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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
THE REQUIREMENTS ON PAGES A-1 AND A-2, FOUND AT 40 CFR PART 60, SUBPART WWW, APPLY TO THIS FACILITY WHILE EMISSIONS OF NONMETHANE ORGANIC COMPOUNDS (NMOC) ARE LESS THAN 50 MEGAGRAMS PER YEAR	hdr
Each owner or operator of an MSW landfill having a design capacity equal to or greater than 2.5 million megagrams and 2.5 million cubic meters, shall either comply with paragraph (b)(2) of this section or calculate an NMOC emission rate for the landfill using the procedures specified in Sec. 60.754. The NMOC emission rate shall be recalculated annually, except as provided in Sec. 60.757(b)(1)(ii) of this subpart. The owner or operator of an MSW landfill subject to this subpart with a design capacity greater than or equal to 2.5 million megagrams and 2.5 million cubic meters is subject to part 70 or 71 permitting requirements.	40 CFR Section 60.752(b)
If the calculated NMOC emission rate is less than 50 megagrams per year, the owner or operator shall: (i) Submit an annual emission report to the Administrator, except as provided for in Sec. 60.757(b)(1)(ii); and	40 CFR Section 60.752(b)(1)(i)
Recalculate the NMOC emission rate annually using the procedures specified in Sec. 60.754(a)(1) until such time as the calculated NMOC emission rate is equal to or greater than 50 megagrams per year, or the landfill is closed. (A) If the NMOC emission rate, upon recalculation required in paragraph (b)(1)(ii) of this section, is equal to or greater than 50 megagrams per year, the owner or operator shall install a collection and control system in compliance with paragraph (b)(2) of this section.	40 CFR Section 60.752(b)(1)(ii)
(B) If the landfill is permanently closed, a closure notification shall be submitted to the Administrator as provided for in Sec. 60.757(d).	40 CFR Section 60.752(b)(1)(ii) CONTINUED
The landfill owner or operator shall calculate the NMOC emission rate using either the equation provided in paragraph (a)(1)(i) of this section or the equation provided in paragraph (a)(1)(ii) of this section. Both equations may be used if the actual year-to-year solid waste acceptance rate is known, as specified in paragraph (a)(1)(i), for part of the life of the landfill and the actual year-to-year solid waste acceptance rate is unknown, as specified in paragraph (a)(1)(ii), for part of the life of the landfill. The values to be used in both equations are 0.05 per year for k, 170 cubic meters per megagram for L0, and 4,000 parts per million by volume as hexane for the CNMOC. For landfills located in geographical areas with a thirty year annual average precipitation of less than 25 inches, as measured at the nearest representative official meteorologic site, the k value to be used is 0.02 per year.	40 CFR Section 60.754(a)(1)
In addition to the above provision, the Permittee may use the method specified in Minn. R. 7011.3505, Subp. 7 to estimate NMOC emissions.	Minn. R. 7011.3505, Subp. 7
The following equation shall be used if the actual year-to-year solid waste acceptance rate is known: $Mn_{moc} = \sum [2(k)(L_0)(M_i)(\exp(-k t_i))(Cn_{moc})(3.6 \times 10^{-9})]$ <p>where SUM is over the number of sections of the landfill Mn_{moc} = total NMOC emission rate from the landfill, megagrams/year</p>	40 CFR Section 60.754(a)(1)
k=methane generation rate constant, year ⁻¹ L ₀ =methane generation potential, cubic meters per megagram solid waste M _i =mass of solid waste in the i th section, megagrams t _i =age of the i th section, years CNMOC=concentration of NMOC, parts per million by volume as hexane 3.6 x 10 ⁻⁹ =conversion factor The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value for M _i if documentation of the nature and amount of such wastes is maintained	40 CFR Section 60.754(a)(1)(i) CONTINUED

TABLE A: LIMITS AND OTHER REQUIREMENTS

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<p>The following equation shall be used if the actual year-to-year solid waste acceptance rate is unknown.</p> $MNOC = 2Lo R ((\exp(-kc)) - (\exp(-kt))) CNOC (3.6 \times 10^{-9})$ <p>Where:</p> <p>MNOC=mass emission rate of NMOC, megagrams per year Lo=methane generation potential, cubic meters per megagram solid waste R=average annual acceptance rate, megagrams per year k=methane generation rate constant, year⁻¹ t = age of landfill, years</p>	40 CFR Section 60.754(a)(1)(ii)
<p>CNOC=concentration of NMOC, parts per million by volume as hexane c=time since closure, years; for active landfill c=0 and e-kc=1 3.6 x 10⁻⁹=conversion factor</p> <p>The mass of nondegradable solid waste may be subtracted from the total mass of solid waste in a particular section of the landfill when calculating the value of R, if documentation of the nature and amount of such wastes is maintained.</p>	40 CFR Section 60.754(a)(1)(ii) CONTINUED
<p>Tier 2. The landfill owner or operator shall determine the NMOC concentration using the following sampling procedure. The landfill owner or operator shall install at least two sample probes per hectare of landfill surface that has retained waste for at least 2 years. If the landfill is larger than 25 hectares in area, only 50 samples are required. The sample probes should be located to avoid known areas of nondegradable solid waste. The owner or operator shall collect and analyze one sample of landfill gas from each probe to determine the NMOC concentration using Method 25 or 25C of Appendix A of this part. Method 18 of Appendix A of this part may be used to analyze the samples collected by the Method 25 or 25C sampling procedure. Taking composite samples from different probes into a single cylinder is allowed; however, equal sample volumes must be taken from each probe.</p>	40 CFR Section 60.754(a)(3)
<p>For each composite, the sampling rate, collection times, beginning and ending cylinder vacuums, or alternative volume measurements must be recorded to verify that composite volumes are equal. Composite sample volumes should not be less than one liter unless evidence can be provided to substantiate the accuracy of smaller volumes. Terminate compositing before the cylinder approaches ambient pressure where measurement accuracy diminishes. If using Method 18, the owner or operator must identify all compounds in the sample and, as a minimum, test for those compounds published in the most recent Compilation of Air Pollutant Emission Factors (AP-42), minus carbon monoxide, hydrogen sulfide, and mercury. As a minimum, the instrument must be calibrated for each of the compounds on the list. Convert the concentration of each Method 18 compound to CNOC as hexane by multiplying by the ratio of its carbon atoms divided by six.</p>	40 CFR Section 60.754(a)(3) CONTINUED
<p>If more than the required number of samples are taken, all samples must be used in the analysis. The landfill owner or operator must divide the NMOC concentration from Method 25 or 25C of Appendix A of this part by six to convert from CNOC as carbon to CNOC as hexane. If the landfill has an active or passive gas removal system in place, Method 25 or 25C samples may be collected from these systems instead of surface probes provided the removal system can be shown to provide sampling as representative as the two sampling probe per hectare requirement. For active collection systems, samples may be collected from the common header pipe before the gas moving or condensate removal equipment. For these systems, a minimum of three samples must be collected from the header pipe.</p>	40 CFR Section 60.754(a)(3) CONTINUED
<p>The landfill owner or operator shall recalculate the NMOC mass emission rate using the equations provided in paragraph (a)(1)(i) or (a)(1)(ii) of this section and using the average NMOC concentration from the collected samples instead of the default value in the equation provided in paragraph (a)(1) of this section.</p>	40 CFR Section 60.754(a)(3)(i)
<p>If the resulting mass emission rate calculated using the site-specific NMOC concentration is equal to or greater than 50 megagrams per year, then the landfill owner or operator shall either comply with Sec. 60.752(b)(2), or determine the site-specific methane generation rate constant and recalculate the NMOC emission rate using the site-specific methane generation rate using the procedure specified in paragraph (a)(4) of this section.</p>	40 CFR Section 60.754(a)(3)(ii)
<p>If the resulting NMOC mass emission rate is less than 50 megagrams per year, the owner or operator shall submit a periodic estimate of the emission rate report as provided in Sec. 60.757(b)(1) and retest the site-specific NMOC concentration every 5 years using the methods specified in this section.</p>	40 CFR Section 60.754(a)(3)(iii)
OPERATIONAL REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

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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
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
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
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)
RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
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); most stringent, meets requirement of 40 CFR Section 60.7(f)
Recordkeeping: (1) The Permittee shall maintain files of all information (including all reports and notifications) required by 40 CFR Part 63 recorded in a form suitable and readily available for expeditious inspection and review. The files shall be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data shall be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche. (2) The Permittee shall maintain relevant records of: (i) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment); (ii) The occurrence and duration of each malfunction of the required air pollution control and monitoring equipment;	40 CFR Section 63.10(b)

TABLE A: LIMITS AND OTHER REQUIREMENTS

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<p>(iii) All required maintenance performed on the air pollution control and monitoring equipment;</p> <p>(iv) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the affected source's startup, shutdown, and malfunction plan;</p> <p>(v) All information necessary to demonstrate conformance with the affected source's startup, shutdown, and malfunction plan when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan.</p>	40 CFR Section 63.10(b), CONTINUED
REPORTING/SUBMITTALS	hdr
Change in information already provided. Any change in the information already provided under 40 CFR Section 63.9 shall be provided to the Administrator and the permitting authority in writing within 15 calendar days after the change.	40 CFR Section 63.9(j)
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	Minn. R. 7019.1000, subp. 3
<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	Minn. R. 7019.1000, subp. 2
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
<p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 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
<p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p> <p>If a minor, moderate or major amendment is required, submittal of the application for an amendment satisfies the notification requirement of 40 CFR Section 60.7(a)(4).</p>	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. 7019.3100
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

03/21/05

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Permit Number: 08500047 - 001

Subject Item: EU 001 Flare (burning LFG)**Associated Items:** CE 001 Flaring

GP 001 Landfill, gas collection and flare

What to do	Why to do it
THE FOLLOWING REQUIREMENT APPLIES TO THIS FACILITY WHILE EMISSIONS OF NONMETHANE ORGANIC COMPOUNDS (NMOC) ARE LESS THAN 50 MEGAGRAMS PER YEAR	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0110

TABLE B: SUBMITTALS

03/21/05

Facility Name: Waste Management - Spruce Ridge
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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

03/21/05

Facility Name: Waste Management - Spruce Ridge
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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

03/21/05

Facility Name: Waste Management - Spruce Ridge

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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
Annual Report	due 32 days after end of each calendar year following Permit Issuance if the calculated NMOC emission rate is less than 50 megagrams per year, the Permittee shall submit this report of the actual NMOC emissions for the previous calendar year	Total Facility
Compliance Certification	due 30 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 MATERIAL

Facility Name: 3M Cottage Grove Specialty Additives

Permit Number: 16300002-001

Appendix I – Insignificant Activities

As described in instructions for IA-01

G: quality control laboratory

H(1): less than 200 gallons VOC use

H(3): hydraulic and hydrostatic testing equipment

H(4): brazing, soldering, and welding equipment

Minn. R. 7007.100, 3D(2)

Blenders, EU031, EU032

Bins, EU029, 030

Mill product collection, EU036

Nuisance dust system, EU027, EU028

Reject hopper, EU035

#2 blending system

Offline packaging systems, EU010, EU011, EU038

Floated products line

Remelt transport, EU037

Weigh hoppers

Required to be listed in Part 70 permits

Product collection

Raw material handling

Dryer

Input hopper

Packaging room

Powder pusher

Bag baler

Frit product collection

Product collection (2)

Additive bag feeders (2)

Weigh hopper

Silica weigh hopper

ESP dust transport

charging and weighing

trailer loading

silica storage silo

blender

furnace hopper

lime storage silo, EU018

product storage silos, EU013, EU014

raw material bins, EU019

bag dump stations, EU020

reject hopper material collection, EU021

Insignificant Activities – Periodic Monitoring

The Permittee listed several current insignificant activities in the permit application and supplemental submittals, as noted in Table 6. The permit is required to include periodic monitoring for all emissions units, including insignificant activities, per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. Using the criteria outlined earlier in this TSD, the following table documents the justification why no additional periodic monitoring is necessary for the current insignificant activities, and likely future ones, that might be located at this site.

Table 6. Insignificant Activities

Insignificant Activity	Currently on site? (Y/N)	General Applicable Emission limit	Discussion
Space heaters fueled by kerosene, natural gas or propane	Y	PM, variable depending on airflow Opacity \leq 20% with exceptions (Minn. R. 7011.0610)	For these units based on the fuels used and published emissions factors, it is highly unlikely that they could violate the applicable requirement. These units are vented inside a building, so testing is not feasible.
Fuel use in furnaces or boilers with a capacity of less than 500,000 Btu/hr.	Y	PM \leq 0.4 lb/MMBtu Opacity \leq 20 % (Minn. R. 7011.0610)	For these units based on the fuels used and EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Infrared electric ovens	N	Opacity \leq 20% (Minn. R. 7011.0110)	While no emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that they could generate visible emissions. In addition, these units would be operated and vented directly into the building, so monitoring or testing is not feasible.
Emissions from laboratory operations, as defined in Minn. R. 7007.1300, subp. 3(G)	Y	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	These are very small, intermittent, bench-top operations that typically do not even have any emissions. It is highly unlikely that they could violate the applicable requirement.
Brazing, soldering or welding equipment	Y	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	For these units, based on EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	N	Opacity \leq 20% (Minn. R. 7011.0110)	While no emissions estimation method exists for these units, based on general knowledge of how they operate, it is highly unlikely that

Insignificant Activity	Currently on site? (Y/N)	General Applicable Emission limit	Discussion
			they could generate visible emissions. In addition, these units would be operated and vented directly into the building, so monitoring or testing is not feasible.
Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners	Y	PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0610 + Minn. R. 7011.0715)	For these units, there are some factors available for the burners, but very little information regarding the cleaning operation itself. However, based on general knowledge of how they operate, it is highly unlikely that they could violate the applicable requirement or that testing would be feasible.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities	N	PM, variable depending on airflow or process weight rate Opacity \leq 20% (Minn. R. 7011.0715)	While spray equipment will have the potential to emit particulate matter, these particular activities are those not associated with production, so they would be infrequent and usually occur outdoors. Testing or monitoring is not feasible.
Individual units that have potential emissions of less than 2.28 lb/hr of various criteria pollutants and less than certain thresholds of HAPs.	Y	PM \leq 0.4 lb/MMBtu Opacity \leq 20 % (Minn. R. 7011.0515) or PM, variable depending on airflow Opacity \leq 20% (Minn. R. 7011.0715)	Based on calculations provided by the Permittee (see Attachment 3), it is highly unlikely that they could violate the applicable requirement. In addition, these units are operated and vented inside a building, so testing for PM or opacity is not feasible.