AIR EMISSION PERMIT NO. 12300292- 002

IS ISSUED TO

Wolkerstorfer Co Inc

WOLKERSTORFER CO INC
348 1st Street Southwest
New Brighton, Ramsey County, MN 55112

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	Permit Action No.	Issuance Date
Re-issuance of Total Facility Operating Permit	February 28, 2006	002	See below

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

Permit Type: State; Limits to Avoid Part 70, Part 63/Limits to Avoid NSR

Issue Date: April 24, 2007

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

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

for Brad Moore
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:

Wolkerstorfer Co., Inc. is a metal finishing job shop which operates two boilers, one metal plating line, six wet process lines, one Teflon paint booth, two truck paint booths, nine paint booths, one touch-up paint booth, three paint bake ovens, three Teflon bake ovens, one plating bake oven, one spindle line oven and one electric oven. Wolkerstorfer Co., Inc. began operations at this facility in 1979. The primary SIC Code is 3479.

Details of modifications at the facility within the previous permit term can be found in the Technical Support Document.

This is a Total Facility Federally Enforceable State Operating Permit Re-Issuance that authorizes operation of the facility.

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Wolkerstorfer Co Inc

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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
Insignificant Activities: The Permittee shall evaluate the emissions from changes made under Minn. R. 7007.1300 on an annual basis to ensure that no applicable thresholds are crossed. The Permittee shall not make any change that causes emissions to exceed permit thresholds in Minn. R. ch. 7007 without first obtaining the appropriate permit amendment.	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200 Title I Condition: To avoid major source classification under 40 CFR Section 63.2
The Permittee shall determine the change in emissions for the previous calendar year due to equipment changes in GP 001 and GP 003 on an annual basis. The Permittee shall not make any change that causes emissions to exceed permit thresholds in Minn. R. ch. 7007 without first obtaining the appropriate permit amendment. The emissions determination shall be submitted with the annual Compliance Certification listed in Table B (due January 30).	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200 Title I Condition: To avoid major source classification under 40 CFR Section 63.2
The Permittee may add new stacks under GP 001, GP 002 and GP 003 anytime before permit expiration. The Permittee shall maintain records on site of stack parameters for any stack additions to GP 001, GP 002 and GP 003 using the latest MPCA application forms.	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200 Title I Condition: To avoid major source classification under 40 CFR Section 63.2
The Permittee shall submit an annual report due January 30 of each year that documents all equipment added under GP 001, GP 002 and GP 003 during the last calendar year using the latest MPCA application forms. The report shall be submitted with the annual Compliance Certification listed in Table B.	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200 Title I Condition: To avoid major source classification under 40 CFR Section 63.2
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 control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices 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 practices, 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)

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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: 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)

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Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. 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

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **GP 001 Direct Heating Equipment**

Associated Items: EU 003 Bake Oven #1

EU 004 Bake Oven #2

EU 005 Bake Oven #3

EU 006 Teflon Bake Oven #1

EU 007 Teflon Bake Oven #2

EU 008 Plating Bake Ovens #1

EU 042 Spindle Line Oven

EU 049 Spantek IR Oven

EU 050 Teflon Oven #3

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 as described in Minn. R. 7011.0730 Table 1 or Minn. R. 7011.0735 Table 2.	Minn. R. 7011.0610, subp. 1(A)(1)
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0610, subp. 1(A)(2)
Fuel Type: Natural gas or propane only, maintain records of fuel type used on site.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
The Permittee may replace or move direct heating equipment units in GP 001. All replacement units must meet all permit requirements of the units they replace. The Permittee may add new direct heating units to GP 001. All other permit limits must be met.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21 & Minn. R. 7007.3000

Facility Name: Wolkerstorfer Co Inc

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Subject Item: **GP 002 Material Application Equipment**

Associated Items: EU 010 Teflon Paint Booth

EU 011 Truck Booth #1

EU 012 Truck Booth #2

EU 013 Spray Paint Booth #1

EU 014 Spray Paint Booth #2

EU 015 Spray Paint Booth #3

EU 016 Touch-up Booth

EU 040 Spray Booth - Remelle

EU 041 Spray Booth Spindle Line #1

EU 047 Plating Spray Booth #1

EU 048 Plating Spray Booth #2

EU 051 Spindle Line Spray Booth #2

EU 055 Spindle Line Spray Booth #3

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 as described in Minn. R. 7011.0730 Table 1 and Minn. R. 7011.0735 Table 2.	Minn. R. 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Volatile Organic Compounds: less than or equal to 85 tons/year (usage) based on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP 002 as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material (i.e. coatings, gun cleaner,...) shall be determined as described under the Material Content requirement in GP 002. The calculation of VOCs emitted may take into account recovered/recycled VOCs as described under the Recovery requirement in GP 002.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
Particulate Matter < 10 micron: less than or equal to 75 tons/year (usage) based on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP 002 as allowed in this permit shall be included in this calculation. Solids contents for each coating shall be determined as described under the Material Content requirement in GP 002.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
Total Particulate Matter: less than or equal to 75 tons/year (usage) based on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP 002 as allowed in the permit shall be included in this calculation. Solids contents of each coating shall be determined as described under the Material Content requirement in GP 002.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
HAPs - Total: less than or equal to 23.5 tons/year (usage) based on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP 002 as allowed in this permit shall be included in this calculation. HAP contents of each coating shall be determined as described under the Material Content requirement in GP 002. The calculation of total HAPs emitted may take into account recovered/recycled HAPs as described under the Recovery requirement in GP 002.	Limit to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
Single HAP: less than or equal to 9.25 tons/year (usage) based on a 12-month rolling sum to be calculated by the 15th day of each month for the previous 12-month period. All emission units or stacks added to GP 002 as allowed in this permit shall be included in this calculation. HAPs content of each coating shall be determined as described under the Material Content requirement in GP 002. The calculation of single HAPs emitted may take into account recovered/recycled VOCs as described under the Recovery requirement in GP 002.	Limit to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
The Permittee may replace listed emission units, move emission units or add new emission units to those listed in GP 002, provided VOC, HAP, PM, and PM less than 10 microns emissions are tracked directly from material usage. All replaced or added units must meet the requirements for GP 002.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2

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Material Content: VOC, HAPs, and Solids (PM and PM < 10 microns) contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. When using the MSDS as the basis of determining compliance with particulate limits, the conservative assumption is made that PM consists entirely of PM less than 10 microns. Other alternative methods approved by the MPCA may be used to determine the VOC, HAPs, and Solids contents. The Division Manager reserves the right to require the Permittee to determine the VOC, HAP, and Solids contents 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: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
Recovery/Recycling: 1. Analyze composite sample of waste material using a gas chromatograph or other method approved by the Director, semi annually for percent solvent recovery and composition. Sample shall be composited over a calendar six months. 2. The value used for percent recovery shall be the value determined during the previous calendar six months. 3. The value used for HAP composition shall be the value determined during the previous calendar six months. 4. The weight of the composite sample shall be determined each calendar six months.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **GP 003 Decorative Chrome Tanks**

Associated Items: EU 019 Chrome #1

EU 053 Chromic Acid Anodize

SV 017 Scrubber Stack

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 003. All replaced or added units must meet the requirements for GP 003.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.21; to avoid major source classification under 40 CFR Section 70.2; and to avoid major source classification under 40 CFR Section 63.2
The Permittee shall use a chemical fume suppressant containing a wetting agent at all times.	40 CFR Section 63.342(d)(2)
Surface Tension: less than or equal to 45 dynes/cm (surface tension of the electroplating or anodizing bath) at any time during operation of the decorative chrome tanks.	40 CFR Section 63.342(d)(2)
Monitor and record the surface tension of the electroplating or anodizing bath once every 4 hours during operation of the tank with a stalagmometer or a tensiometer. A decrease in monitoring frequency is allowed following the procedures in paragraphs 40 CFR Section 63.34 (c)(5)(ii)(B) and (C). Once a bath solution is drained from the decorative chrome tank and a new solution is added, the original monitoring schedule of once every 4 hours must be resumed, with a subsequent decrease in monitoring frequency allowed.	40 CFR Section 63.343(c)(5)
The Permittee shall prepare and implement an Operation and Maintenance (O&M) plan by January 27, 1997. The O&M plan shall 1) specify the O&M criteria for the facility and include a standardized checklist to document the operation and maintenance of the equipment; 2) specify procedures to be followed to ensure that malfunctions due to poor maintenance or other preventable conditions do not occur; and 3) contain systematic procedures for identifying malfunctions and implementing corrective actions to address the malfunction. The Permittee shall revise the initial O&M plan if it fails to adequately address a malfunction within 45 days after such an event occurs.	40 CFR Section 63.342(f)(3)
Notify: due 2 days after Discovery of Deviation any period of malfunction which is not consistent with the O&M plan. The Permittee must record the action taken and follow up the notification by a letter within 7 working days after the end of the event.	40 CFR Section 63.342(f)(3)
The Permittee shall comply with the recordkeeping and reporting requirements associated with the O&M plan.	40 CFR Section 63.342(f)(3)
The Permittee shall keep the written O&M plan on record to be made available for inspection. If the plan has been revised, previous versions shall be made available for inspection for the 5 years after each revision to the plan.	40 CFR Section 63.342(f)(3)
The Permittee shall operate and maintain all decorative chrome tanks in accordance with the O&M plan.	40 CFR Section 63.342(f)(1)
Work Practice Standards: The Permittee shall document that the inspection and maintenance required by the work practice standards have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection.	40 CFR Section 63.346(b)
Maintain records of all maintenance performed on the decorative chrome tanks and on the monitoring equipment.	40 CFR Section 63.346(b)
Maintain records of the occurrence, duration, and cause (if known) of each malfunction of process and monitoring equipment.	40 CFR Section 63.346(b)
Maintain records of actions taken during periods of malfunction when such actions are inconsistent with the O&M plan.	40 CFR Section 63.346(b)
Maintain records of monitoring data that are used to demonstrate compliance with the surface tension standard including the date and time the data are collected.	40 CFR Section 63.346(b)
Document the date and time of commencement and completion of each period of excess emission, that occurs: 1. during malfunction of the process or monitoring equipment; and 2. during periods other than malfunction of the process or monitoring equipment	40 CFR Section 63.346(b)
Maintain records of the total process operating time of the decorative chrome tanks during the reporting period.	40 CFR Section 63.346(b)
Maintain records of the date and time that fume suppressants are added to the electroplating or anodizing bath.	40 CFR Section 63.346(b)

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The Permittee shall prepare an annual summary report to document the ongoing compliance status of the decorative chrome tanks. The report shall be retained on site.	40 CFR Section 63.347(h)
Notify: due 30 days after Compliance Certification Status date of January 25, 1997. The Permittee shall submit notification of compliance status including applicable emissions limitations and the methods used to determine compliance by February 24, 1997.	40 CFR Section 63.347(e)
Notify: due before Anticipated Date of Initial Startup . A notification of compliance status is required each time that a decorative chrome tank becomes subject to the requirements of this subpart.	40 CFR Section 63.347(e)
The Permittee shall correct malfunctions as soon as practical in accordance with the O&M plan.	40 CFR Section 63.342(f)(1)
The O&M plan requirements are enforceable independent of emissions limitations or other requirements in relevant standards.	40 CFR Section 63.342(f)(1)
Notify: due before Start Of Construction or Reconstruction. Notification of intent to construct or reconstruct a decorative chrome plating tank is due as soon as practicable prior to the action. Submit the necessary information as listed in the appropriate requirement in Table B, GP 003.	40 CFR Section 63.5(a)(2)
Notification information required for construction or reconstruction: 1. The Permittee's name and address; 2. A notification of intention to construct or make any physical or operational change to the decorative chrome tanks; 3. The address of the source; 4. An identification of the relevant standard that is the basis of the notificaiton; 5. The expected commencement, completion, and anticipated startup dates; 6. The type and quantity of HAPs emitted by the source; 7. The control efficiency for each HAP; 8. Construction Only - A description of the following technical information: proposed nature, size, design, operating design capacity, and method of operation; identification of each emission point for each HAP and a description of pollution control systems; and 9. Reconstruction Only - A brief description of the decorative chrome tanks and the components that are to be replaced.	40 CFR Section 63.5(a)(2)

Facility Name: Wolkerstorfer Co Inc

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Subject Item: **GP 006 Storage Tank Requirments**

Associated Items: TK 001 Propane 74-98-6

TK 002 Propane 74-98-6

What to do	Why to do it
The owner or operator of any storage vessel with a storage capacity of greater than 2,000 gallons (7,571 liters) but less than or equal to 40,000 gallons (151,412 liters) for which construction was commenced on or after June 11, 1973, shall equip the storage vessel with a permanent submerged fill pipe.	Minn. R. 7011.1505, subp. 3(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **SV 001 Boiler #1 Stack**

Associated Items: EU 001 Boiler #1

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0515, subp.1
Sulfur Dioxide: less than or equal to 2 lbs/million BTU heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **SV 002 Boiler #2 Stack**

Associated Items: EU 002 Boiler #2

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0515, subp.1
Sulfur Dioxide: less than or equal to 2 lbs/million BTU heat input	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **SV 017 Scrubber Stack**

Associated Items: EU 017 Passivate Solution

EU 019 Chrome #1

EU 021 Nitric Acid

EU 022 Mixed Acid Actane

EU 023 Sulfuric Acid

EU 024 Electroless Nickel

EU 025 Electroless Nickel

EU 027 Hydrochloric Acid

EU 028 Alkaline Cleaners

EU 029 Black Oxide

EU 053 Chromic Acid Anodize

EU 054 Sulfuric Acid Anodize

GP 003 Decorative Chrome Tanks

What to do	Why to do it
LIMITS APPLY TO EACH EMISSION UNIT SEPERATELY	hdr
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions as stated in Minn. R. 7011.0730 Table 1 or Minn. R. 7011.0735 Table 2.	Minn. R. 7011.0715, subp. 1(A)

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **SV 020 Gas Heater Black Oxide Stack**

Associated Items: EU 039 Gas Heater - Black Oxide

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.4 lbs/million BTU heat input	Minn. R. 7011.0515, subp.1
Opacity: less than or equal to 20 percent opacity ; except that a maximum of 60 percent opacity shall be permissible for four minutes in any 60-minute period and that a maximum of 40 percent opacity shall be permissible for four additional minutes in any 60-minute period.	Minn. R. 7011.0515, subp. 2

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

Subject Item: **CE 008 Wet Scrubber - High Efficiency w/Lime Slurry**

Associated Items: EU 017 Passivate Solution

EU 019 Chrome #1

EU 021 Nitric Acid

EU 022 Mixed Acid Actane

EU 023 Sulfuric Acid

EU 024 Electroless Nickel

EU 025 Electroless Nickel

EU 027 Hydrochloric Acid

EU 028 Alkaline Cleaners

EU 029 Black Oxide

EU 053 Chromic Acid Anodize

EU 054 Sulfuric Acid Anodize

What to do	Why to do it
The Permittee shall operate the wet scrubber according to manufacturer's specifications at all times when EU 019 through EU 032 are in operation. The operation of the control equipment is not necessary in order for the process to meet applicable emission limits. However, the operation of this control equipment allows the Permittee to take credit for its operation.	Minn. R. 7007.0800, subp. 2

TABLE B: SUBMITTALS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

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.

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

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 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

Send any application for a permit or permit amendment to:

AQ Permit Technical Advisor
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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.

Unless another person is identified in the applicable Table, send all other submittals to:

AQ Compliance Tracking Coordinator
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

What to send	When to send	Portion of Facility Affected
Notice of Shut Down of Noncompliant Emission Unit(s)	due 14 days after Shut Down of Noncompliant Emission Unit(s) . Submit the name and number of each unit and the anticipated date of initial startup of each unit.	GP003
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup . Submit the name and number of each unit and the actual date of initial startup each unit.	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup . Submit the name and number of each unit and the actual date of initial startup of each unit.	GP003
Notification of the Anticipated Date of Initial Startup	due 30 days before Anticipated Date of Initial Startup . Submit the name and number of each unit and the anticipated date of initial startup each unit.	Total Facility
Notification of the Date Construction Began	due 30 days after Start Of Construction . Submit the name and number of each unit and the date construction of each unit began.	GP003
Notification of the Date Construction Began	due 30 days after Start Of Construction Submit the name and number of each unit and the date construction of each unit began.	Total Facility
Notification of the date of Equipment Removal/Dismantlement	due 15 days after Equipment Removal and/or Dismantlement . Submit the name and number of each unit and the date the unit was removed and/or dismantled.	Total Facility

TABLE B: RECURRENT SUBMITTALS

Facility Name: Wolkerstorfer Co Inc

Permit Number: 12300292 - 002

What to send	When to send	Portion of Facility Affected
Deviations Report	due 30 days after end of each calendar half-year starting 09/05/1996 (July 30 and January 30 for the previous 6-month period) if the conditions of excess emissions as defined in 40 CFR Section 63.347(h)(2) are met. The Permittee may request a reduction in reporting frequency in accordance with 40 CFR Section 63.347(h)(3).	GP003
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 occured, 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 to the Commissioner on a form approved by the Commissioner. This report covers all deviations experienced during the calendar year.	Total Facility

Additional Appendix Material - Wolkerstorfer Co Inc, Permit Number: 12300292-002

Insignificant Activities Required To Be Listed - The table below lists the insignificant activities that are allowed at the facility and their associated general applicable requirements.

Minn. R.	Rule Description of the Activity	Applicable Requirement
7007.1300, subp. 3(B)	B. Furnaces and boilers: (2) fuel burning equipment with a capacity less than 500,000 Btu per hour, but only if the total combined capacity of all fuel burning equipment at the stationary source with a capacity less than 500,000 Btu per hour is less than or equal to 2,000,000 Btu per hour.	Minn. R. 7011.0515
7007.1300, subp. 3(B)(1)	Infrared Electric Ovens	Minn. R. 7011.0110
7007.1300, subp. 3(G)	Chemical Lab vent in Waste Treatment area	Minn. R. 7011.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0715
7007.1300, subp. 3(H)	Welding Equipment in Maintenance Room Photo copiers – 3 Desktop printers Wax tank Alkaline Cleaners – associated Cleaners (EU 028)	Minn. R. 7011.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0715
7007.1300, subp. 3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of carbon monoxide; and 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone.	Minn. R. 7011.0515 + Minn. R. 7011.0610 + Minn. R. 7011.0715
7007.1300, subp. 3(J)	Unpaved parking lots	Minn. R. 7011.0715
7007.1300, subp. 3(K)	Spray painting building and equipment/plant upkeep	Minn. R. 7011.0715

Minn. R.	Rule Description of the Activity	Applicable Requirement
7008.4110	Emissions from equipment venting particulate matter (PM) or particulate matter less than 10 microns (PM-10) inside a building, provided that emissions from the equipment are: a). filtered through an air cleaning system; and b). vented inside of the building 100% of the time. 2 Spantek Line Powder Booths - Indoor vent only	Minn. R. 7011.0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 12300292-002

This Technical Support Document (TSD) is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp. 1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Stationary Source/Address (SIC Code: 3479)
Wolkerstorfer Company, Inc. 348 1st St SW New Brighton, Ramsey County, MN 55112
Contact: John Peterson, (651) 636-0720

1.2. Description of the Facility: Wolkerstorfer Co., Inc. is a metal finishing job shop which operates two boilers, one metal plating line, six wet process lines, one Teflon paint booth, two truck paint booths, nine paint booths, one touch-up paint booth, three paint bake ovens, three Teflon bake ovens, one plating bake oven, one spindle line oven and one electric oven. Wolkerstorfer Co., Inc. began operations at this facility in 1979. The primary SIC Code is 3479.

This is a Total Facility Federally Enforceable State Operating (Flexible) Permit Re-Issuance that authorizes operation of the facility.

1.3 Description of any Changes Allowed with this Permit Issuance: None

1.4 Changes/Modifications at the facility during the last 10 years:

The original Total Facility Permit was issued in September of 1996. Since it was a flexible permit, the following changes took place at the facility:

- December 1996 – added a new stack and a Spindle line Spray Booth #2
- May 1997 – added stacks to Plating Booths
- March 1998 – connected venting for Black Oxide Heater
- July 1998 - moved Passivate Solution (now vented through a control equipment); removed Electropolish and the stack
- October 1998 – added stack to Spantek IR Oven
- January 1999 – removed control equipment for electro-less nickel tanks and sulfuric acid

- March 2000 – added stack to Spantek IR Drying Oven
- May 2001 – connected Teflon Oven to associated stack
- June 2001 – removed wet scrubber (CE 007)
- October 2001 – Spray Paint Booths names changed
- June 2004 – added Spindle Line Spray Booth #3 and added associated control equipment with stack

Note: EU 053 was added under GP 003; at the request of the Permittee, the language for "analyze composite sample of waste material" under GP 002 was amended to reduce the frequency to semiannually (email from Scott Parr), instead of quarterly basis.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

	PM tpy	PM_{10} tpy	SO_2 tpy	NO_x tpy	CO tpy	VOC tpy	Single HAP tpy	All HAPs tpy
Total Facility Limited Emissions	87.4	87.4	23.6	8.2	6.4	85.4	9.3	23.5
Actual Emissions (2004)	0.67	0.67	0.0	0.24	0.17	5.41	HAPs not reported in emission inventory	

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD		X	
Part 70 Permit Program		X	
Part 63 NESHAP		X	
Part 61 NESHAP	X		

2. Regulatory and/or Statutory Basis

Important Note: This facility received the Total Facility Permit in 1996 and there were no amendments issued after that.

New Source Review

The facility is an existing non- major source under New Source Review regulations. No changes are authorized by this permit.

Part 70 Permit Program

The facility is a non-major source under the Part 70 permit program.

New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the operations at this facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility has accepted limits on HAP usage such that it is a non-major source under 40 CFR pt. 63. Thus, no NESHAPs apply to the facility due to the synthetic minor limits in the permit. However, at the time of previous total facility permit, this facility was a major area source under 40 CFR Part 63 (Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks) that has NESHAP requirements for Chrome Dip tanks.

Note: EPA Proposes to Eliminate "Once In, Always In" Policy for Major Sources of Toxic Emissions (December 21, 2006) – EPA issued a proposal to eliminate its "once in, always in" policy for major sources of toxic air emissions and instead allow a major source to become an area source at any time by limiting its potential to emit (PTE) toxic air pollutants to below the major source thresholds.

It is not known at this time how this proposal would affect the NESHAP requirements for the Chrome Dip tanks. When this rule becomes final and the facility does not have to comply with the NESHAP requirements, then the Permittee could submit a major amendment and request that the NESHAP requirements for the Chrome Dip tanks (GP 003) be removed.

Minnesota State Rules

Portions of the facility are subject to the following Minnesota Standards of Performance:

- Minn. R. 7011.0515 Standards of Performance for New Indirect Heating Equipment
- Minn. R. 7011.0610 Standards of Performance for Fossil-Fuel-Burning Direct Heating Equipment
- Minn. R. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment
- Minn. R. 7011.1505 Standards Of Performance For Storage Vessels

Table 3. Regulatory Overview of Facility

FC, EU, GP, CE, or SV	Applicable Regulations	Comments:
FC	Title I limit to avoid 40 CFR § 52.21, 40 CFR Part 63	Flexible Permit: Limit set on Total Facility and HAP emissions from coating operations to avoid major source classification under 40 CFR § 52.21 and 40 CFR Part 63.
GP 001	Minn. R. 7011.0610, subp. 1(A)(1) and (2) Title I limit to avoid 40 CFR § 52.21	Standards of Performance for Fossil-fuel-burning Direct Heating Equipment. Limits PM and Opacity Fuel Type and flexibility to add new equipment (**GP 001**: EU 003, 004, 005, 006, 007, 008, and 042)
FC, EU, GP, CE, or SV	Applicable Regulations	Comments:
GP 002	Minn. R. 7011.0715, subp. 1(A) and 1(B) Title I limits to avoid 40 CFR § 52.21, 0 CFR Part 63; Limits to avoid 40 CFR § 70.2 (based on 12-month rolling sum of each pollutant)	Standards of Performance for Post-1969 Industrial Process Equipment. Limits PM and Opacity Title I Condition: VOC emissions equal to or less than 85.0 tons per year; PM_{10} emissions equal to or less than 75.0 tons per year; PM emissions equal to or less than 75.0 tons per year HAPs – Total: equal to or less than 23.5 tons per year Single HAP: equal to or less than 9.25 tons per year Calculating of emissions by the 15th day of every month. Material Content to be determined using the MSDS or other alternative methods approved by the MPCA. (**GP 002**: EU 010, 011, 012, 013, 014, 015, 016, and 040)
GP 003	Title I limits to avoid 40 CFR § 52.21, 40 CFR Part 63; Limits to avoid 40 CFR § 70.2	Title I Condition: Flexibility to move or replace, or add emission units. 40 CFR Part 63, Subpart N - National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks: limits Surface Tension; O&M plan; Work Practice Standards; Notification requirements
SV 001 EU 001 SV 002 EU 002	Minn. R. 7011. 0515, subps. 1 and 2	Standards of Performance for New Indirect Heating Equipment: limits PM, Opacity, and Sulfur Dioxide
SV 017	Minn. R. 7011. 0715, subps. 1 (A) and (B)	Standards of Performance for Post-1969 Industrial Process Equipment: limits PM and Opacity
SV 020	Minn. R. 7011. 0515,	Standards of Performance for New Indirect Heating

	subps. 1 and 2	Equipment: limits PM, Opacity
CE 008	Minn. R. 7007.0800, subp. 2	Scrubber: Operate control equipment according to manufacturer's specifications at all time when EU 019 through EU 032 are in operation.

FC = Facility; EU = Emission Unit; GP = Group; CE = Control Equipment; SV = Stack/Vent

3. Technical Information

3.1 Calculations of Potential to Emit

Table 4. Emissions Summary (by emission unit)

Emission Units	PM	PM-10	SOx	CO	NO_x	VOC	HAP-s	HAP-t
1 - 9, 39, 42: Combustion	0.58	0.58	21.62	6.43	7.65	0.42	na	na
10 - 16, 40, 41: Coating	75	75	-	-	-	85	9.25	23.5
17, 19, 21, 22, 23, 24, 25, 27, 28, 29: Plating...	11.8	11.8	2.0	0	0.55	0	0.03	0.03
47, 48: pwd. coat	0	0	0	0	0	0	0	0
Summary:	87.4	87.4	23.62	6.43	8.2	85.42	9.28	23.53

Combustion sources Sample calculation

18.35 MMBtu/hour
18.35 MMBtu/hour
1050 Btu/ft^3 natural gas 17476.19 ft^3/hour 100.00%

	PM	PM10	SO2	NOx	VOC	CO	
NG EF	7.60E-06	7.60E-06	6.00E-07	1.00E-04	5.50E-06	8.40E-05	lb/ft^3
NG	0.58	0.58	0.05	7.65	0.42	6.43	tpy

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, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- 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 elsewhere.

Note: In lieu of creating a table and recording the details of additional monitoring for the emission limits in the permit, a Summary of important conclusions from the previous Total Facility Permit TSD is enclosed to document as all of the original limits are carried over in this permit:

Comments: All general requirements and some site specific conditions are listed at the total facility level. The site specific requirements are listed first.
1. *Insignificant Activities*: Title V requires that insignificant activities (Minn. R. 7007.1300) be included when they affect applicability. The Permittee has allowed sufficient room for insignificant activities expected at the facility between their limits and the thresholds such that specific tracking and reporting to the MPCA is not required. They are obligated to track insignificant activities according to the rule and send notification when appropriate. If the insignificant activities accumulated such that they could affect applicability, they would need to apply for an amendment to lower the cap or incorporate the activities into the cap.

- Listed Insignificant Activities
  S/V 24, 25, 26, 27, 28 and CE 4,5,6,7 are associated with insignificant activities
- Powder coating is an insignificant activity that will not affect applicability determinations.

2. *Flexibility*: The permit has flexibility included which allows the Permittee to move, add, and replace equipment as long as the emissions from the facility stay below permit limits and federal thresholds. This is an expiring state permit (10-year duration). When the permit is reissued, the permit will be revised to represent the most recent equipment and stack configurations.

The Permittee is required to evaluate the emissions from Group 1 and Group 3 on an annual basis and compare the emissions to applicable thresholds. There are no specific limits set for the emission units in these groups as the potential emissions are very small (see table below) when compared to threshold values.

Emission Units	PM	PM_{10}	SO_x	CO	NO_x	VOC	HAP-single	HAP-total
Group 1	0.285	0.285	0.02	0.50	3.94	0.14	NA	NA
Group 3	0.03	0.03	0	0	0	0	0.03	0.03

Group 001: Direct Heating Equipment Emission Unit: 003-008, 042
Emission Limit and/or Special Conditions: See CD forms for limits and basis
Comments: There are no emissions from EU 009 which is an electric oven. Any volatilization which takes place within the oven, or emitted from the stack are accounted for in mass balance equations within Group 002.

1. Flexibility provisions which pre-authorize changes and additions within the group.

2. Natural gas or propane only.
3. The Direct Heating Equipment Rule applies, Minn. R. 7011.0610. It is not limiting for any pollutant; therefore, we are including the variable language for this rule.

Compliance Method: Documentation on site that only natural gas and propane will be used. The unrestricted PTE of direct heating equipment, along with any future direct heating equipment that is reasonable to consider that may be added would not trigger any new applicable requirements. They would have to grow by over 500% to near any limit - and this is considering emissions as PTE, not as actual emissions. This is especially unreasonable in light of the company's policy of switching to powder coating whenever possible (3 new lines already).

Group 002: Material Application Equipment Emission Units: 010-016, 040
Emission Limit and/or Special Conditions:

1. Flexibility provisions which pre-authorize changes and additions within the group. They are a "job-shop" with variable and unknown production. They also operate on very tight time-frames.
2. Limits taken for VOCs, HAPs, PM and PM_{10}. The facility specifically chose tighter limits than necessary to encourage pollution prevention activities at the facility.
3. The Industrial Process Equipment Rule applies, Minn. R. 7011.0715. It is not limiting for any pollutant in this permit; therefore, we are including the variable language for this rule.

TABLE 2
8 stacks, with a range of exhaust rates from 4,200 to 16,000 acfm at ambient temp.

Limit: 0.100 gr/dscf x 1 lb/7000 gr x 1 ton/2000 lb x 4,200 acf/min x 60 min/hr x 8760 hr/yr
= 15.77 ton/year x 8 stacks = 126.16 ton/year.

Limit: 0.08 gr/dscf x 1 lb/7000 gr x 1 ton/2000 lb x 16,000 acf/min x 60 min/hr x 8760 hr/yr
= 48.05 ton/year x 8 stacks = 384.4 ton/year.

4. Control equipment (i.e. panel filters) for the spray booths will be needed to ensure compliance with the PM limits. They will have 80% capture and 92% control. The Remele booth is totally enclosed, the rest operate as hoods. This is consistent with manufacturer's testing information.
5. Powder Coating is a listed insignificant activity. Emission calculations are not required for applicability (too small to affect applicability determination).
6. The facility will be recovering/recycling VOCs and HAPs from gun cleaners and thinners. They will be testing the recovered material and factoring this into their emissions. Analysis of the waste material will be by gas chromatograph with FID detector. The facility will prepare a composite sample (consisting of a sample from each barrel shipped) each quarter, and use the results of the testing for calculating reductions in VOC and HAP emissions.

Group 003: Decorative Chrome Tanks Emission Units: 019 and 020
Emission Limit and/or Special Conditions: See CD forms for limits and basis
Comments: Pre-authorization to add new decorative chrome tanks in accordance with the NESHAP requirements. No restrictions on emissions as they are too small to affect applicability determination. The PTE also doesn't reflect the existence of the wet scrubber.

Note from the original Total Facility permit TSD: E-mail dated 4/20/95 from Phyllis Strong: Decorative chrome tanks and chrome anodizing tanks that use fume suppressants added to the bath to meet a surface tension of 45 dynes/cm are exempt from Title V Permitting.

S/V 001 and 002 Emission Units: 001 and 002, Boilers
Emission Limit and/or Special Conditions: No NSPS is applicable to the boilers.

Minn. R. 7011.0515, Indirect heating equipment rule applies

- Fuels: Boilers 1 & 2 use Natural gas, propane and Distillate Oil grades 1 and 2
  Heater 39 uses natural gas only, no SO_2 limits
- Located within MSP region, MMBtu of all units = 21.5 < 100 => 0.4 lb PM/MMBtu for all fuels, 2.0 lb SO_2/MMBtu for liquid fuels, rest is N.A.
- Boiler 1: 2.0 lb SO_2/MMBtu x 6.3 MMBtu = 12.6 lb/hr SO_2 (limited by PTE)
- Boiler 2: 2.0 x 4.5 = 9.0 lb/hr SO_2 (limited by PTE)
- Opacity: shall not exceed 20 % with qualifications
- Compliance with PM limit, SO_2 limit and opacity would be based upon performance testing, if requested by the Division Manager

S/V 016-018 Emission Units: 017, 019, 021, 022, 023, 024, 025, 027, 028, 029, Plating Tanks
Emission Limit and/or Special Conditions: Only applicable rule is the Industrial Process Equipment Rule.

Emission calculations based on % loss of make-up method. Determined amount of make-up materials added for all bath compounds, scaled up for PTE, applied appropriate gassing rate.

The control equipment for the tanks was not used in the determination of applicable requirements or the PTE. It will be used for purposes of the emission inventory. If testing would be required, they would choose not to use it for the purposes of the emission inventory.

S/V 020 Emission Unit: 39, Gas Heater.

3.3 Insignificant Activities

Wolkerstorfer Co Inc. has several operations which are classified as insignificant activities. These are listed in Appendix I to the permit.

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.

Table 5. Insignificant Activities

Insignificant Activity	General Applicable Emission limit	Discussion
Fuel use: space heaters fueled by, kerosene, natural gas, or propane	PM $\leq$ 0.4 lb/MMBtu, Opacity $\leq$ 20% with exceptions (Minn. R. 7011.0515)	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 types of units are typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Infrared electric ovens	Opacity $\leq$ 20% (Minn. R. 7011.0105 or 7011.0110)	These units are not likely to have any emissions of particulate matter at this site (used to dry off VOCs). It is highly unlikely that they could violate the applicable requirement.
Emissions from a laboratory, as defined in Minn. R. 7007.1300, subp. 3(G)	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	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 typically operated and vented inside a building, so testing for PM or opacity is not feasible.
Individual units with actual emissions less than 2000 lb/year of certain pollutants	PM, variable depending on airflow Opacity $\leq$ 20% (with exceptions) (Minn. R. 7011.0715 and Minn. R. 7011.610)	These are several natural gas combustion units as well as an assortment of process equipment. For the natural gas units, based on the fuels used and EPA published emissions factors, it is highly unlikely that they could violate the applicable requirement. In addition, all of these units are operated and vented inside a building, so testing for PM or opacity is not feasible. The remaining units are not expected to

Insignificant Activity	General Applicable Emission limit	Discussion
		generate particulate matter.
Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source	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.
Equipment venting PM/PM_{10} inside a building, provided that emissions from the equipment are: a). filtered through an air cleaning system; and b). vented inside of the building 100% of the time	PM, variable depending on airflow Opacity $\leq$ 20% (Minn. R. 7011.0715) OR PM $\leq$ 0.4 lb/MMBtu, Opacity $\leq$ 20% with exceptions (Minn. R. 7011.0515)	There are various grinding and cutting machines as well as a clothes dryer that is ducted back into the building. For these units, it is highly unlikely that they could violate the applicable requirement. In addition, these units are vented inside a building, so testing for PM or opacity is not feasible.
Blueprint copiers and photographic processes	Opacity $\leq$ 20% (Minn. R. 7011.0105 or 7011.0110))	While no known 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 an office area, so monitoring or testing is not feasible.
Cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners	PM, variable depending on airflow Opacity $\leq$ 20% (Minn. R. 7011.0610+ Minn. R. 7011.0710/715)	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.
Fugitive Emissions from unpaved roads and parking lots	Requirement to take reasonable measures to prevent PM from becoming airborne (Minn. R. 7011.0150)	The Facility is located in the Metro area and has all paved parking lots and few private roads. Nearly all surfaces are currently paved. The draft/proposed permit does contain a general requirement that this standard must be met. The Permittee has stated that no additional unpaved surfaces will be added in the future.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements.

3.5 Comments Received

Public Notice and EPA Review Period: 3/22/2007 – 4/23/2007
Comments were not received from the public or EPA during the public notice period.

4. Conclusion

Based on the information provided by Wolkerstorfer Co Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 12300292-002, and this TSD, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team: John Chikkala (permit engineer)
Christian Norman (enforcement)
Bonnie Nelson (peer reviewer)

AQ File No. 1689; DQ 928