

AIR EMISSION PERMIT NO. 05300759-004

IS ISSUED TO

**ANCHOR BLOCK COMPANY
5959 Baker Road
Minnetonka, MN 55345**

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	Action No.	Application Date (s)	Issuance Date
Part 70 Manufacturing General Permit	001	June 10, 1996	October 17, 1996
Part 70 Manufacturing General Permit	002	January 26, 1998	December 28, 1998
Part 70 Manufacturing General Permit	003	March 16, 2001	Not Issued
Total Facility Operating Permit	004	August 9, 2001	See Below

This permit authorizes the Permittee to operate and modify the stationary source **Zenith Products Company, located at 9177 Zachary Lane N, Maple Grove, Hennepin County, Minnesota**, unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/Limits to Avoid NSR

Issue Date: September 12, 2005

Final Permit Issuance Date:

Expiration: September 12, 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

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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:

Anchor Block Company owns and operates Zenith Products Company (Zenith) located at 9177 Zachary Lane, Maple Grove, Hennepin County, Minnesota. Zenith produces burnished concrete blocks. The facility consists of sealer booths, grinders and cut-off saws with fabric filter baghouses and make-up air unit. The main sources of emissions are particulate matter, particulate matter less than 10 microns, volatile organic compounds and hazardous air pollutants.

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

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
A. FACILITY SPECIFIC REQUIREMENTS	hdr
This permit establishes limits on the stationary source (including authorized modifications) to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a major permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: Limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Insignificant Activities: The Permittee shall evaluate the emissions from changes made under Minn. R. 7007.1300 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 a major permit amendment.	Title I Condition: Limit to avoid classification as major source or modification under 40 CFR Section 52.2
B. 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)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
C. 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)
D. RECORDKEEPING REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

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)
E. REPORTING/SUBMITTALS	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due 91 days after end of each calendar year following permit issuance (April 1). To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
F. NATIONAL EMISSION STANDARD FOR HAZARDOUS AIR POLLUTANTS (NESHAP) REQUIREMENTS	hdr
The Permittee shall not "construct or reconstruct" a major source of hazardous air pollutants as defined in 40 CFR pt. 63, subp. B without first obtaining a preconstruction permit.	40 CFR Section 63.5 (b)(3)

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

Subject Item: GP 001 Sealer Booths

Associated Items: CE 100 Mat or Panel Filter
CE 501 Mat or Panel Filter
CE 502 Mat or Panel Filter
EU 010 Sealer Booth #1
EU 020 Sealer Booth #2
EU 048 Sealer Booth #3
SV 001 Sealer Booth Emissions
SV 002 Sealer Booth Emissions
SV 003 Sealer Booth Emissions

What to do	Why to do it
A. EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot using 3-hour Rolling Average of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735 This limit applies separately to each unit in GP 001.	Minn. R. 7011.0715, subp. 1(A)
Volatile Organic Compounds: less than or equal to 100 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month. All emission units, except those deemed to be insignificant activities under Minn. R. 7007.1300, and those added as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material will be determined as described under the Material Content requirement.	Title I Condition: Limit to avoid classification as a major source or modification under 40 CFR Section 52.21 and Minn. R. 7007.3000
Opacity: less than or equal to 20 percent opacity . This limit applies separately to each unit in GP 001.	Minn. R. 7011.0715, subp. 1(B)
B. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change. The list shall correlate the units to the numbers used in this permit (EU, GP, CE) and shall include the data on GI-04, GI-05B, and GI-05C. The date of construction shall be the date the change was made for replaced, modified, or new equipment.	Minn. R. 7007.0800, subp. 2
Pre-authorized Changes: The Permittee may replace or move listed emission units , or add new emissions units similar but not limited to the following: spray guns, and sealer booths, as well as coating, and other solvents or material changes provided that VOC, PM and PM less than 10 microns emissions are tracked and calculated as required by this permit. All changes must meet the requirements as listed in this section. If a proposed change triggers an applicable requirement that is not contained in this permit, the change must go through the appropriate procedure in Minn. R. ch. 7007.	Title I Condition: Limit to avoid classification as major source and modification under 40 CFR Section 52.21
Daily Recordkeeping. On each day of operation, the Permittee shall record, and maintain the total quantity of all coatings and other VOC containing materials used at the facility except fuel usages which will be track on a monthly basis. This shall be based on written usage logs or records of material deliveries to the process or facility.	Title I Condition: Monitoring for Limit to avoid classification as major source and modification under 40 CFR 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800. subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

<p>Monthly Recordkeeping -- VOC Emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <p>1) The total usage of VOC containing materials for the previous calendar month using the daily usage records. This record shall also include the VOC and solids contents of each material as determined by the Material Content requirement of this permit;</p> <p>2) The VOC emissions for the previous month using the formulas specified in this permit; and</p> <p>3) The 12 month rolling sum VOC emissions for the previous 12 month period by summing the monthly VOC emissions data for the previous 12 months.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Monthly Calculation -- VOC Emissions.</p> <p>The Permittee shall calculate VOC emissions using the following equations:</p> <p>$VOC_{total} = (VOC_{coating} + Solvents) + (VOC_{combustion} \text{ sources})$ See GP 005</p> <p>$VOC_{(coating + solvents \text{ in tons/month})} = V - W$</p> <p>$V = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$</p> <p>$W = (C1 \times D1) + (C2 \times D2) + C3 \times D3 + \dots$</p> <p>where:</p> <p>V = total VOC used in tons/month;</p> <p>A# = amount of each VOC containing material used, in tons/month;</p> <p>B# = weight percent VOC in A#, as a fraction;</p> <p>W = the amount of VOC shipped in waste, in tons/month;</p> <p>C# = amount, in tons/month, of each VOC containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero; and</p> <p>D# = weight percent of VOC in C#, as a fraction.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Material Content: VOC contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC contents. The Commissioner reserves the right to require the Permittee to determine the VOC contents of any material, according to U.S. EPA or ASTM reference methods. If an U. S. EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the MSDS.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Waste Credit: If the Permittee elects to obtain credit for VOC shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC content of each waste shipment, using the same content data used to determine the content of raw materials. If the waste contains several materials, the content of mixed waste shall be assumed to be the lowest VOC of the materials.</p>	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

Subject Item: GP 002 Control Equipment -Mat or Panel Filters**Associated Items:** CE 100 Mat or Panel Filter

CE 501 Mat or Panel Filter

CE 502 Mat or Panel Filter

What to do	Why to do it
A. OPERATIONAL REQUIREMENTS	hdr
(All requirements apply to each control equipment unit listed above.)	
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency, for Total Particulate Matter: greater than or equal to 73.6 percent control efficiency	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A); Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency, for Particulate Matter < 10 micron: greater than or equal to 73.6 percent control efficiency	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A); Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the panel filters any time that any process equipment controlled by the panel filters is (are) in operation (GP 002). The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.0800, subps. 2 and 14
B. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Daily Inspections: Once each operating day, the Permittee shall visually inspect the condition of each panel filter with respect to alignment, saturation, tears, holes and any other condition that may affect the filter's performance. The Permittee shall maintain a daily written record of filter inspections.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7011.0080; Minn. R. 7007.0800, subps. 2 and 14
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subps. 4, 5, and 14
Corrective Actions: If the filters or any of their components are found during the inspections to need repair, the Permittee shall take corrective action as soon as possible. Corrective actions shall include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subps. 4, 5, and 14
Operation and Maintenance of Filters: The Permittee shall operate and maintain each filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14
Initial Hood Certification and Evaluation: The control device hood must conform to the requirements listed in Minn. R. 7011.0070, subp. 1, and the Permittee shall certify this as specified in Minn. R. 7011.0070, subp. 3. The Permittee shall maintain a copy of the evaluation and certification on site.	Minn. R. 7007.0800, subps. 4, 5 and 14
Annual Hood Evaluation: The Permittee shall measure and record at least once every 12 months the fan rotation speed, fan power draw, or face velocity of each hood, or other comparable air flow indication method. The Permittee shall maintain a copy of the annual evaluation on site.	Minn. R. 7007.0800, subps. 4, 5 and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

Subject Item: GP 003 Control Equipment -Fabric Filters**Associated Items:** CE 200 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 300 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 400 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 503 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

What to do	Why to do it
A. OPERATIONAL REQUIREMENTS (All requirements apply to each control equipment unit listed above.)	hdr
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Total Particulate Matter: greater than or equal to 99 percent control efficiency	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7007.3000; Minn. R. 7011.0065, subp. 1(A); Minn. R. 7007.0800, subps. 2 and 14
The Permittee shall operate and maintain the control equipment such that it achieves an overall control efficiency for Particulate Matter < 10 micron: greater than or equal to 99 percent control efficiency	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7011.0065, subp. 1(A); Minn. R. 7007.0800, subp. 2 and 14
B. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Pressure Drop: greater than or equal to 2 inches of water column and less than or equal to 6 inches of water column unless a new range is set pursuant to Minn. R. 7017.2025, subp. 3, based on the values recorded during the most recent MPCA approved performance test where compliance was demonstrated. The Permittee shall record the pressure drop once every 24 hours when in operation.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7011.0080; Minn. R. 7007.0800, subp. 2 and 14
Recordkeeping of Pressure Drop. The Permittee shall record the time and date of each pressure drop reading and whether or not the recorded pressure drop was within the range specified in this permit.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7011.0080; Minn. R. 7007.0800, subp. 2 and 14
The Permittee shall operate and maintain the fabric filter at all times that any emission unit controlled by the fabric filter (GP 003) is in operation. The Permittee shall document periods of non-operation of the control equipment.	Title I Condition: Limit taken to avoid classification as a major source and modification under 40 CFR Section 52.21; Minn. R. 7011.0065, subp. 2(A); Minn. R. 7007.0800, subp. 2 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - the recorded pressure drop is outside the required operating range; or - the fabric filter or any of its components are found during the inspections to need repair. Corrective actions shall return the pressure drop to within the permitted range, and/or include completion of necessary repairs identified during the inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the fabric filter. The Permittee shall keep a record of the type and date of any corrective action taken for each filter.	Minn. R. 7007.0800, subps. 4, 5, and 14
Monitoring Equipment: The Permittee shall install and maintain the necessary monitoring equipment for measuring and recording pressure drop as required by this permit. The monitoring equipment must be installed, in use, and properly maintained when the monitored fabric filter is in operation.	Minn. R. 7007.0800, subp. 4
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect the control equipment components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subps. 4, 5 and 14
The Permittee shall operate and maintain the fabric filter in accordance with the Operation and Maintenance (O & M) Plan. The Permittee shall keep copies of the O & M Plan available onsite for use by staff and MPCA staff.	Minn. R. 7007.0800, subp. 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

Subject Item: GP 004 Grinders and Cut-off Saws

Associated Items:

CE 200 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 300 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 400 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

CE 503 Fabric Filter - Low Temperature, i.e., T<180 Degrees F

EU 041 Burnish Block Grinder 1

EU 042 Burnish Block Grinder 2

EU 043 Burnish Block Grinder 3

EU 044 End Grinder 1

EU 045 End Grinder 2

EU 046 Cutoff Saw No.1

EU 049 Cutoff Saw No. 2

EU 050 Edge Grinder

EU 051 Cutoff Saw No. 3

SV 004 Grinder Emissions

SV 005 Grinder Emissions

SV 007 Grinder/Cut-off Saw Emissions

What to do	Why to do it
A. EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot using 3-hour Rolling Average of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735. This limit applies separately to each unit in GP 004.	Minn. R. 7011.0715, subp. 1(A); Minn. R. 7011.0730; Minn. R. 7011.0735
Opacity: less than or equal to 20 percent opacity . This limit applies separately to each unit in GP 004.	Minn. R. 7011.0715, subp. 1(B)
B. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change.	Minn. R. 7007.0800, subp. 2
The list shall correlate the units to the numbers used in this permit (EU, GP, CE) and shall include the data on GI-04, GI-05B, and GI-05C. The date of construction shall be the date the change was made for replaced, modified, or new equipment.	
Pre-authorized Changes: The Permittee may replace or move listed emission units, or add new emissions units similar but not limited to the following: grinders, and cutoff saws provided that PM and PM less than 10 microns emissions are tracked and calculated as required by this permit. All changes must meet the requirements as listed in this section.	Title I Condition: Limit to avoid classification as major source and modification under 40 CFR Section 52.21
If a proposed change triggers an applicable requirement that is not contained in this permit, the change must go through the appropriate procedure in Minn. R. ch. 7007.	

TABLE A: LIMITS AND OTHER REQUIREMENTS

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

Subject Item: GP 005 Combustion Sources**Associated Items:** EU 047 Make-up Air Unit

What to do	Why to do it
A. EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input using 3-hour Rolling Average . Potential PM emissions of the unit are approximately 0.007 lb/million Btu heat input.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Type: Natural gas only, by design.	Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchases for the Facility on a monthly basis by the 15th day of each month.	Minn. R. 7007.0800, subp. 5
B. MONITORING AND RECORDKEEPING REQUIREMENTS	hdr
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change.	Minn. R. 7007.0800, subp. 2
The list shall correlate the units to the numbers used in this permit (EU, and GP) and shall include the data on GI-04, and GI-05B. The date of construction shall be the date the change was made for replaced, modified, or new equipment.	
Pre-authorized Changes: The Permittee may replace or move listed emission units , or add new emissions units similar but not limited to the following: make-up air units. All changes must meet the requirements as listed in this section.	Title I Condition: Limit to avoid classification as major source and modification under 40 CFR Section 52.21
If a proposed change triggers an applicable requirement that is not contained in this permit, the change must go through the appropriate procedure in Minn. R. ch. 7007.	
Monthly Calculation ---VOC Emissions for Combustion Sources The Permittee shall calculate VOC emissions from combustion sources using the following equation. $\text{VOC}_{\text{combustion sources}} = [\text{EF (fuel used)} \times \text{Q (fuel used)}] \times 0.0005$ <p>where: EF= VOC emission factor using the most recent EPA's AP-42 emission factors published of the fuel used, lb/gal Q = amount of fuel combusted, gal/month 0.0005 = conversion factor, ton/lb</p> See GP 001 for the total VOC emissions from the total facility.	Minn. R. 7007.0800, subps. 4 and 5

TABLE B: SUBMITTALS

09/12/05

Facility Name: Zenith Products Co
Permit Number: 05300759 - 004

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:

AQ Permit Technical Advisor
Industrial 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:

AQ Compliance Tracking Coordinator
Industrial 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

09/12/05

Facility Name: Zenith Products Co
Permit Number: 05300759 - 004

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

09/12/05

Facility Name: Zenith Products Co

Permit Number: 05300759 - 004

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 30 days after end of each calendar year following Permit Issuance. The Permittee shall submit an annual report by January 30th that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall include the emission unit, stack/vent, group, and control equipment data for any new or replaced units or control devices. The report shall document the VOC 12-month rolling sum calculations for the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor source status for New Source Review.	Total Facility
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner and to the US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL**Facility Name: Zenith Products Company****Permit Number: 05300759-004****Appendix B****Insignificant Emission Units and Applicable Requirements**

Description of Activity	Applicable Insignificant Activity	Likely Applicable Requirement
Room Furnace (150,000 Btu/hr)	Minn. R. 7007.1300, subp. 3.A.	Minn. R. 7011.0510
Brazing, soldering, or welding equipment	Minn. R. 7007.1300, subp. 3.H(4)	Minn. R. 7011.0715/0735
Electric Arc Unit	Minn. R. 7007.1300, subp. 3. H(4)	Minn. R. 7011.0715/0735
Blueprint Copier	Minn. R. 7007.1300, subp. 3. H(4)	Minn. R. 7011.0715/0735
Metal Cutting Units	Minn. R. 7007.1300, subp. 3. D(2)	Minn. R. 7011.0715/0735
Torch Unit (55 cubic/feet acetylene/hr)	Minn. R. 7007.1300, subp. 3. H(4)	Minn. R. 7011.0715/0735
Fugitive Emissions from Roads and Parking Lots	Minn. R. 7007.1300, subp. 3. J	Minn. R. 7011.0150

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 05300759-004

This technical support document 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:

Applicant/Address	Stationary Source/Address (SIC Code: 3271)
Anchor Block Company 5959 Baker Road, Minnetonka, Minnesota 55345	Zenith Products Company 9177 Zachary Lane North Maple Grove, Minnesota Hennepin County
Contact: Jay Battenberg Phone: (763) 425-4111	

1.2. Description of the Facility

Anchor Block Company owns and operates Zenith Products Company (Zenith) located at 9177 Zachary Lane, Maple Grove, Hennepin County, Minnesota. Zenith produces burnished concrete blocks. The facility consists of sealer booths, grinders, and cut-off saws with fabric filter baghouses, make-up air unit and insignificant activities.

The main sources of emissions are particulate matter (PM), particulate matter less than 10 microns (PM₁₀), volatile organic compounds (VOC) and hazardous air pollutants (HAP). The permit limits the emissions of the facility such that the facility is classified as a non-major source under federal New Source Review (NSR).

The permit also allows operating flexibility by authorizing the installation, modification, replacement, and removal of equipment without a permit amendment, so long as the source remains in compliance with its permit. The Permittee will not “construct or reconstruct a major source of HAPs” as defined in 40 CFR pt. 63, subp. B, without first obtaining a preconstruction permit.

1.3. Description of the Permit Action

Zenith submitted an application for a Total Facility Air Emission Permit as required by Minnesota Rules chapter (Minn. R. ch.) 7007. Minn. R. ch. 7007 implements Title V of the federal Clean Air Act as amended 1990. The application for the Part 70 Manufacturing General Permit (MGP) was received by the Minnesota Pollution Control Agency (MPCA) on March 16, 2001. Based on the information included in the revised application for the MGP, Zenith did not qualify for the MGP; therefore, the application was returned. Zenith reapplied for a Part 70 permit on August 9, 2001, which met the deadline indicated in MPCA staff's letter dated June 5, 2001. Zenith did not submit any information that was claimed to be confidential verbally or in written correspondence.

1.4. Description of All Amendments Issued Since the Issuance of the Last Total Facility Permit

Permit Number and Issuance Date	Action Authorized
NA	Minor Permit Application dated March 3, 2004. This action will be rolled into the Title V permit.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

Pollutants	Sealer Booths and Cleanup (tpy)	Grinders and Cutoff Saws (tpy)	Makeup Air Unit and IAs (tpy)	Total Facility Limited Potential Emissions (tpy)	Total Facility Actual Emissions (tpy)
Particulate Matter (PM)	9.34	24.99	0.21	34.54	1.40
PM less than 10 microns (PM ₁₀)	9.34	1.56	0.21	11.11	0.39
Nitrogen Oxides (NO _x)	0.00	0.0	2.71	2.71	0.34
Sulfur Oxides (SO ₂)	0.00	0.0	0.02	0.02	0.00
Volatile Organic Compounds (VOC)	99.85	0.0	0.15	100	9.12
Carbon Monoxide (CO)	0.00	0.0	2.28	2.28	0.29
HAP-Toluene	39.35	0.0	0.0	39.35	9.12
HAP- Total	39.35	0.0	0.0	39.35	9.12

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD	N/A	VOC(Ozone)	PM, PM ₁₀ , NO _x , CO, SO ₂
Part 70 Permit Program	VOC (Ozone), HAP		PM ₁₀ , NO _x , CO, SO ₂
Part 63 NESHAP	HAP		

2. Regulatory and/or Statutory Basis

New Source Review (NSR)

The facility has taken limits to avoid major source classification for New Source Review (40 CFR § 52.21). Actual emissions have never exceeded major source levels. No changes subject to NSR are authorized by this permit.

Part 70 Permit Program

The facility is a 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 is an existing major source under 40 CFR pt. 63. This source is not listed on the list of categories of HAP, required under Section 112 (c) and (e) of the Clean Air Act (CAA).

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. 7011.0715 Standards of Performance for Post-1969 Industrial Process Equipment

Table 3. Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
Total Facility (TF); GP 001	40 CFR § 52.21; 40 CFR pt. 70; Minn. R. 7001.3000; Minn. R. 7011.0715	Title I Condition: Prevention of Significant Deterioration (PSD). Limits taken to avoid major source classification under PSD for all emissions of VOC. Standards of Performance for Post-1969 Industrial Equipment. This applies to all units in GP 001, individually.
TF	Minn. R. chs. 7002, 7007, 7009, 7011, 7019 and 7030	Table A contains requirements that apply to all facilities in Minnesota. Reporting and monitoring requirements are contained in Table B of the permit.
GP 002 and GP 003	Minn. R. 7011.0065; Minn. R. 7011.0070	The Permittee will operate and maintain each piece of listed pollution control equipment according to Minn. R. 7011.0075 and will comply with requirements specified in the permit.
GP 005 EU 047	Minn. R. 7011.0515, subps 1 and 2	Standards of Performance for New Indirect Heating Equipment. This rule specifies limits for particulate matter, sulfur dioxide and opacity.

3. Technical Information

3.1 Calculations of Potential to Emit

Attachment C of this TSD contains detailed spreadsheets and supporting information prepared by both the Permittee and the MPCA staff.

Sealer Booths

The PTE calculations for PM/PM10 were based on solids in the solvent and coating material and taking into consideration the application method, the transfer efficiency and pollution control equipment.

The PTE calculations for VOC/HAP were based on the mass balance of solvent and coating usage assuming 100 percent of the VOC/HAP were emitted.

Grinders and Cut-off Saws

Although, Zenith is a not brick manufacturing facility, the grinding and cut-off sawing operations are very similar to the grinding and screening operations in a brick manufacturing facility; therefore, the PTE calculations were based on EPA approved emission factors from AP-42, section 11.3, Particulate Matter Emission Factors for Brick Manufacturing Operations.

Makeup Air Unit

The PTE calculations were based on EPA approved emission factors from AP-42, section 1.4 Natural Gas Combustion, the fuel burned, and the unit capacity.

Calculations of VOC emissions from Coating, Solvents, and Combustion Sources

Total VOC emissions must be recorded on a daily basis and calculated monthly using the following equation:

$$\text{VOC}_{\text{total}} = \text{VOC}_{(\text{coating} + \text{solvents})} + \text{VOC}_{(\text{combustion sources})}$$

$$\text{VOC}_{(\text{coating} + \text{solvents})} [V] = (A1 \times B1) + (A2 \times B2) + \dots$$

V = the monthly VOC emissions in tons per month

A# = the amount of VOC containing material used in the previous month (e.g. sealer, siloxane, etc.), in tons

B# = the weight percent of VOC in A#, as a fraction (e.g. if a material was 60% by weight, then this would be 0.60)

If Permittee needs to take credit for VOC shipped in waste, use the formula as above.

$VOC_{(\text{combustion sources})} = \text{VOC emissions from the combustion sources.}$ The Permittee will use the most recent AP-42 emission factors to calculate the VOC emissions.

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.

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

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
Sealer Booths (GP 001) PM/PM10 and VOC	<p>a. $VOC \leq 100$ tons per year, on a 12 month rolling basis (limit to avoid NSR)</p> <p>b. PM/PM10: variable depending on the airflow. (Minn. R. 7011.0715)</p> <p>c. $Opacity \leq 20\%$ (Minn. R. 7011.0715)</p> <p>d. Replacement of emission units with similar units and</p>	<p>a. Recordkeeping: Daily records of coating usage; On-going MSDS records of coating contents; Monthly emission calculations.</p> <p>b. and c. None</p> <p>d. On going recordkeeping to verify and certify on an annual basis to maintain the source in a non-major status.</p>	<p>Zenith will generate on a daily basis records based on usage using meter readings and written production logs. Zenith will also calculate and maintain records of the 12-month rolling sum of VOC emission limit on a monthly basis. A 12-month rolling sum is warranted for Zenith due to the substantial and unpredictable variation in their production.</p> <p>Any new or modified equipment must meet all the applicable requirements in the permit. If a</p>

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	modifications to existing units and addition of the authorized new equipment.	On going records of any equipment that was replaced.	<p>new or modified unit would trigger a different requirement, the change cannot be made without an amendment. In addition, emissions must be tracked and calculated as required by the permit.</p> <p>PM limits at EU 010, EU 020 and EU 048 (and associated monitoring, CE 100, CE 501 and 502) ensure that this applicable requirement is being met. These other operational limits give these booths PTEs of 0.31 lb/hr, 0.60 lb/hr and 1.22 lbs/hr of PM, respectively. Applicable rule limit at maximum airflow are 4.91 lbs/hr, 7.11 lbs/hr and 3.5 lbs/hr, respectively per booth; therefore, no additional periodic monitoring is warranted.</p>
Panel Filters (GP 002, CE 100, CE 501-502)	PM/PM10: The panel filters must be maintained to achieve 73.6% control efficiency. (limit to avoid NSR; Minn. R. 7011.0065; Minn. R. 7007.0800)	Recordkeeping: O & M inspections and certification of the hood (booth) performance in accordance with the control equipment rule, if applicable.	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance (daily, periodic inspections and correction actions.)
Fabric Filters (GP 003, CE 200, 300, 400 and 503)	PM/PM10: the fabric filters must be maintained to achieve 99 percent control efficiency. (limit to avoid NSR; Minn. R. 7011.0065; Minn. R. 7007.0800)	Recordkeeping: O & M inspections, and pressure drop or visible emissions	Monitoring based on the Minnesota Performance Standard for Control Equipment is adequate to have a reasonable assurance of compliance (daily, periodic inspections and correction actions.)
Grinders	a. PM/PM10:		The likelihood of violating the

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
and Cut-off saws (GP 004)	variable depending on the airflow. (Minn. R. 7011.0175) b. Opacity \leq 20 % (Minn. R. 7011.0715)		PM and opacity emission standard maybe impossible as long as the units are properly maintained. In addition, the Permittee must maintain the associated control equipment.
Combustion sources (GP005) Make-up Air Unit (EU 047)	PM: \leq 0.4 lb/MMBtu Opacity: \leq 20 % with exceptions (Minn. R. 7011.0515)	Recordkeeping: Monthly Fuel records	This unit is fired with natural gas; therefore, the likelihood of violating the emission limit is very small. The Permittee can demonstrate that the unit will continue to operate such that emissions are well below the emission limit by only burning natural gas. Since this is a permit condition, the semi-annual deviations report will document any deviations from this condition. Design based PTE for each unit, using AP-42, is 0.0072 compared to the rule limit of 0.4 lb/MMBtu.

3.3 Insignificant Activities

Zenith has several operations which are classified as insignificant activities. These are listed in Appendix B to the permit. The permit is required to include periodic monitoring for all emissions units, including insignificant emission units (IEU), per EPA guidance. The insignificant activities at this Facility are only subject to general applicable requirements. It is our belief that IEU's listed in Appendix B to the permit associated with inconsequential environmental impacts and present little potential for violations of generally applicable requirements; therefore, no additional periodic monitoring will be required.

3.4 Permit Organization

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

3.5 Comments Received

Public Notice Period: July 24, 2005 – August 22, 2005

EPA 45-day Review Period: July 21, 2005 – August 31, 2005

Comments were not received from the public during the public notice period. Comments were not received from EPA during their review period.

4. Conclusion

Based on the information provided by Zenith Products Company, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05300759-004 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota Rules.

Staff Members on Permit Team:

Staff Engineer	Amrill Okonkwo (651) 296-7009
Enforcement Staff:	Suzanne Venem (651) 297-7707
Staff Engineer/Peer Reviewer:	Toni Volkmeier (651) 297-7708

Attachments: 1. Facility Emission Summary
2. Facility Description and CD-01 Forms
3. PTE Summary and Calculations

ATTACHMENT A
Facility Emission Summary
(Paper Copy Only)

ATTACHMENT B
Facility Description and CD-01 Form
(Paper Copy Only)

ATTACHEMENT C
PTE Summary and Calculations
(Paper Copy Only)