

AIR EMISSION PERMIT NO. 01700003-001

IS ISSUED TO

Hearthmark, Incorporated

P.O. Box 2729

Muncie, IN 47307-0729

d/b/a

Alltrista Consumer Products Company

1800 Cloquet Avenue

Cloquet, Carlton County, MN 55720

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	Issuance Date	Action Number
Total Facility Operating Permit	November 22, 1995	See Below	001
Major Amendment	June 26, 2002		
Administrative Amendment	March 11, 2003		

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

Permit Type: State; Limits to Avoid Part 70

Issue Date: July 9, 2003

Expiration: Permit does not expire

All Title I Conditions do not expire.

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

for Sheryl A. Corrigan
Commissioner
Minnesota Pollution Control Agency

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NOTICE TO THE PERMITTEE:

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

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

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

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

PERMIT SHIELD:

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

FACILITY DESCRIPTION:

This facility uses birch and aspen logs to produce wooden matches, toothpicks, ice cream sticks, and corn dog sticks. Green logs are de-barked and peeled/veneered to produce blanks that are then dried, shaped, and polished into various products. Coloring is applied to some toothpicks. Wood dust emissions are controlled by cyclones and baghouses. All cyclones except material handling cyclones are vented to baghouses. Waste sawdust and bark is burned in four wood-fired Dutch oven boilers. Boiler particulate matter emissions are controlled by a wet cyclonic separator. The Permittee also operates a print shop for printing on product packaging.

This permit authorizes installation of toothpick and wood craft shapes processing equipment and dryers. The new equipment will be composed of woodworking equipment (with emissions vented to a baghouse), material handling cyclones, and three steam-heated dryers. In addition, this permit includes an administrative permit amendment application for a change in ownership.

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item:**Total Facility**

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
<p>Fabric Filter-Controlled Cyclones: The Permittee shall not bypass a fabric filter that controls any cyclone, except during an emergency. All cyclones listed under the Associated Items in SV 021, SV 029, and SV 036 are subject to this requirement.</p> <p>An emergency is a situation that will cause facility personnel death, illness, or injury, or process equipment or product damage, if the fabric filter is not bypassed. The Permittee may only bypass during an emergency for the time period necessary to safely shutdown the process and/or control equipment.</p> <p>The material handling cyclones listed in GP 003 are not subject to this requirement.</p> <p>The Permittee shall record and keep a record of every fabric filter bypass event. The record shall be dated, and shall list start and stop times for each bypass, the cyclone and fabric filter that is involved in the bypass event, and the reason or cause for the bypass. Each entry shall be signed by the personnel that enters the record.</p>	Title I Condition: To avoid violation of PM10 ambient air standard
<p>Insignificant or Significant PM10 Modifications and Activities: The Permittee shall not add any additional PM10 emission sources, make any modification to the facility that increases the emissions of PM10, or change any of the stack parameters used in the 2003 PM10 ambient air modeling (as listed in the Additional Appendix Material of this permit) that causes a reduction in dispersion of PM10 emissions, without first obtaining a major permit amendment.</p>	Title I Condition: To avoid violation of PM10 ambient air standard
<p>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.</p>	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
<p>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.</p>	Minn. R. 7011.0020
<p>Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and shall include a preventative maintenance program for that equipment, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment, and the records kept to demonstrate plan implementation.</p>	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
<p>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.</p>	Minn. R. 7019.1000, subp. 4
<p>Fugitive Emissions: The Permittee shall 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. The Permittee shall apply reasonable measures to prevent particulate matter from becoming airborne. Reasonable measures include, but are not limited to, paving or frequent clearing of roads, driveways, and parking lots; application of dust-free surfaces; application of water; and the planting and maintenance of vegetative ground cover. The Permittee shall comply with all other requirements in Minn. R. 7011.0150.</p>	Minn. R. 7011.0150
<p>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.</p>	Minn. R. 7030.0010 - 7030.0080
<p>Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).</p>	Minn. R. 7007.0800, subp. 9(A)
<p>The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.</p>	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A, B, and/or C.	Minn. R. ch. 7017
Performance Test Notifications and Submittals: Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements. Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test	Minn. R. 7017.2030, subp. 1-4 and Minn. R. 7017.2035, subp. 1-2
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
MONITORING REQUIREMENTS	hdr
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission or continuous opacity 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

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
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). The Report shall be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3010
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: GP 001 Dryers (Steam-heated)

Associated Items: EU 002 Ice Cream Stick Dryer/SV 002
 EU 003 No. 1 Splint Dryer/SV 003
 EU 004 No. 2 Splint Dryer/SV 004
 EU 013 Coe Veneer Dryer/SV 013 & SV 014
 EU 015 Flat Toothpick Dryer/SV 015
 EU 032 Toothpick Dryer/SV 030
 EU 033 Craft Dryer/SV 031
 EU 034 Large Toothpick Dryer/SV 032

What to do	Why to do it																				
PM10 Emission Limits: <table border="1"> <thead> <tr> <th>Emission Unit/Stack Vent</th><th>PM10 Emission Limit (lb/hr)</th></tr> </thead> <tbody> <tr><td>EU 002/SV 002</td><td>0.00523</td></tr> <tr><td>EU 003/SV 003</td><td>0.00273</td></tr> <tr><td>EU 004/SV 004</td><td>0.00273</td></tr> <tr><td>EU 013/SV 013</td><td>0.0131</td></tr> <tr><td>EU 013/SV 014</td><td>0.0131</td></tr> <tr><td>EU 015/SV 015</td><td>0.00314</td></tr> <tr><td>EU 032/SV 030</td><td>0.00273</td></tr> <tr><td>EU 033/SV 031</td><td>0.00273</td></tr> <tr><td>EU 034/SV 032</td><td>0.00273</td></tr> </tbody> </table>	Emission Unit/Stack Vent	PM10 Emission Limit (lb/hr)	EU 002/SV 002	0.00523	EU 003/SV 003	0.00273	EU 004/SV 004	0.00273	EU 013/SV 013	0.0131	EU 013/SV 014	0.0131	EU 015/SV 015	0.00314	EU 032/SV 030	0.00273	EU 033/SV 031	0.00273	EU 034/SV 032	0.00273	Title I Condition: To avoid violation of PM10 ambient air standard
Emission Unit/Stack Vent	PM10 Emission Limit (lb/hr)																				
EU 002/SV 002	0.00523																				
EU 003/SV 003	0.00273																				
EU 004/SV 004	0.00273																				
EU 013/SV 013	0.0131																				
EU 013/SV 014	0.0131																				
EU 015/SV 015	0.00314																				
EU 032/SV 030	0.00273																				
EU 033/SV 031	0.00273																				
EU 034/SV 032	0.00273																				
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.	Minn. R. 7011.0610, subp. 1(A)(1)																				
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity, for each emission unit in GP 001.	Minn. R. 7011.0610, subp. 1(A)(2)																				

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: GP 002 Boilers**Associated Items:** CE 003 Wet Cyclonic Separator - Wet Cyclone

EU 022 Boiler 1

EU 023 Boiler 2

EU 024 Boiler 3

EU 025 Boiler 4

SV 020 Common Boiler Stack

SV 022 Boiler 1 and 2 Bypass Stack

SV 023 Boiler 3 and 4 Bypass Stack

What to do	Why to do it
LIMITS AND OPERATING REQUIREMENTS	hdr
Particulate Matter < 10 micron: less than or equal to 9.60 lbs/hour from SV 020.	Title I Condition: To avoid violation of PM10 ambient air standard
Total Particulate Matter: less than or equal to 0.6 lbs/million Btu heat input	Minn. R. 7011.0510, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0510, subp. 2
Permitted Fuel: Wood, wood waste, bark, and non-hazardous plant refuse. When combusting refuse in any of the boilers, the total fuel feed to the boiler shall be primarily wood (greater than 50 percent by weight) to avoid classification of the boiler as a waste combustor as defined in Minn. R. 7011.1201, subp. 46.	Minn. R. 7007.0800, subp. 2
Bypass Stack Usage: The Permittee shall not vent emissions from EU 022 and EU 023 through SV 022, and from EU 024 and EU 025 through SV 023, except during emergencies. An emergency is a situation that will cause facility personnel death, illness, or injury, or process equipment or product damage if the bypass stack(s) is not used. The Permittee may only bypass during an emergency for the time period necessary to safely shutdown the process and/or control equipment. The Permittee shall record and keep a record of every bypass stack usage event. The record shall be dated, and shall list start and stop times for each bypass, the stack and boiler(s) involved in the bypass event, and the reason or cause for the bypass. Each entry shall be signed by the personnel that enters the record.	Minn. R. 7007.0800, subp. 2
CONTINUOUS OPACITY MONITORING REQUIREMENTS	hdr
Emissions Monitoring: The Permittee shall use a Continuous Opacity Monitoring System (COMS) to measure opacity from SV 020.	Minn. R. 7017.1006
Recordkeeping: The owner or operator must retain records of all COMS monitoring data and support information for a period of five years from the date of the monitoring sample, measurement or report. Records shall be kept at the source.	Minn. R. 7007.1130
Continuous Operation: The COMS must be operated and data recorded during all periods of emission unit operation including periods of emission unit start-up, shutdown, or malfunction except for periods of acceptable monitor downtime. This requirement applies whether or not a numerical emission limit applies during these periods. The COMS must not be bypassed except in emergencies where failure to bypass would endanger human health, safety, or plant equipment. Acceptable monitor downtime includes reasonable periods as listed in Items A, B, C and D of Minn. R. 7017.1090, subp. 2.	Minn. R. 7017.1090, subp. 1
COMS Daily Calibration Drift (CD) Check: The CD shall be quantified and recorded at zero (low-level) and upscale (high-level) opacity at least once daily. The COMS must be adjusted whenever the CD exceeds twice the specification of Performance Specification 1 of 40 CFR part 60, Appendix B.	Minn. R. 7017.1210, subp. 2
COMS Calibration Error Audit: due before end of each calendar half-year following Permit Issuance. Conduct three point calibration error audits at least 3 months apart but no greater than 8 months apart. Filter values used shall correspond to approximately 11%, 20%, and 37% opacity.	Minn. R. 7017.1210, subp. 3
COMS Calibration Error Audit Results Summary: due 30 days after end of each calendar half-year following COMS Calibration Error Audit.	Minn. R. 7017.1220
COMS Monitoring Data: Owners or operators of all COMS shall reduce all data to 6-minute averages. Opacity averages shall be calculated from all equally spaced consecutive 10-second (or shorter) data points in the 6-minute averaging period.	Minn. R. 7017.1200, subp. 1, 2 & 3

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

QA Plan Required: If the Permittee has not developed a QA plan, develop and implement a written quality assurance plan for the COMS no later than 30 days after permit issuance. The plan shall be on site and available for inspection. The plan shall contain the written procedures listed in Minn. R. 7017.1210, subp. 1.	Minn. R. 7017.1210
PERFORMANCE TESTING REQUIREMENTS	hdr
Initial Performance Test: due before 03/15/2004 to measure SV 020 PM10 emissions from while all four boilers are operating.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7017.2020, subp. 1
CE 003 POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain CE 003 at all times that any emission unit controlled by CE 003 is in operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain CE 003 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
Periodic Inspections: At least once per calendar quarter, or more frequently as required by the manufacturing specifications, the Permittee shall inspect CE 003 components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
<p>Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur:</p> <ul style="list-style-type: none"> - visible emissions above the permitted limit are monitored by the continuous opacity monitor; - the wet cyclonic separator or any of its components are found during any inspection to need repair. <p>Corrective actions shall include implementation of necessary corrective actions to reduce the opacity to below the permitted limit, or completion of needed repairs identified during any inspection, as applicable. Corrective actions include, but are not limited to, those outlined in the O & M Plan for the wet cyclonic separator. The Permittee shall keep a record of the type and date of any corrective action taken for the wet cyclonic separator.</p>	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: GP 003 Material Handling Cyclones

Associated Items: EU 001 Stick Polisher Cyclone/SV 001
 EU 009 Stick Polisher Cyclone/SV 009
 EU 010 TP Polisher Cyclone/SV 010
 EU 012 Splint Material Handling Cyclone/SV 012
 EU 016 ICS Seeder Cyclone/SV 016
 EU 021 CDS Polisher Cyclone/SV 019
 EU 026 Round TP Pointing Cyclone/SV 024
 EU 027 Round TP Pointing Reclaim Cyclone/SV 025
 EU 028 TP Pointing Cyclone/SV 026
 EU 029 TP Pointing Cyclone/SV 027
 EU 035 Splint Transfer Cyclone/SV 033
 EU 036 Shapes Transfer Cyclone/SV 034
 EU 037 Large Toothpick Material Handling Cyclone/SV 035

What to do		Why to do it
PM10 Emission Limits:		Title I Condition: To avoid violation of PM10 ambient air standard
Emission Unit/Stack Vent	PM10 Emission Limit (lb/hr)	
EU 001/SV 001	0.21	
EU 009/SV 009	0.26	
EU 010/SV 010	0.29	
EU 012/SV 012	0.32	
EU 016/SV 016	0.21	
EU 021/SV 019	0.275	
EU 026/SV 024	0.144	
EU 027/SV 025	0.0454	
EU 028/SV 026	0.144	
EU 029/SV 027	0.144	
EU 035/SV 033	0.32	
EU 036/SV 034	0.21	
EU 037/SV 035	0.21	
Total Particulate Matter: less than or equal to 0.30 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735.		Minn. R. 7011.0710, subp. 1(A) and 7011.0715, subp. 1(A)
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity for EU 012 and EU 021.		Minn. R. 7011.0710, subp. 1(B)
Opacity: less than or equal to 20 percent opacity for stack that vents emissions from EU 001, 009, 010, 016, 026, 027, 028, 029, 035, 036, and 037.		Minn. R. 7011.0715, subp. 1(A)
PERFORMANCE TESTING REQUIREMENTS		hdr
Initial Performance Test: due before 03/15/2004 to measure PM10 emissions from either EU 036/SV 034 or EU 037/SV 035.		Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: GP 004 VOC Usage Sources**Associated Items:** FS 001 Misc. Parts Washing and Solvent Use

SV 017 Print Shop Exhaust

SV 018 Toothpick Color Drying Exhaust

What to do	Why to do it
Volatile Organic Compounds: less than or equal to 79 tons/year using 12-month Rolling Sum from all GP 004 VOC emission sources.	Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR 70.2
Material Content: VOC content in VOC-containing materials shall be determined by the Material Safety Data Sheet (MSDS) or Environmental Data Sheet (EDS) provided by the supplier for each material used. If a material content range is given on the MSDS or EDS, 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 VOC content. The Commissioner reserves the right to require the Permittee to determine the VOC content of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the MSDS or EDS.	Minn. R. 7007.0800, subp. 4 and 5
Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record, and maintain a record of the total quantity of each VOC-containing material used by GP 004.	Minn. R. 7007.0800, subp. 4 and 5
Monthly Recordkeeping - GP 004 VOC Emissions. By the 15th of the month, the Permittee shall calculate and record the following using the formulas specified in this permit: 1) The total usage of each VOC-containing materials in the previous calendar month based on daily usage records. This record shall also include the VOC content of each VOC-containing material used in the previous month, as determined by the Material Content requirement of this permit. 2) The total VOC emissions for the previous month using the formulas specified in this permit. 3) The 12-month rolling sum total VOC emissions for the previous 12-month period by summing the monthly emissions data for the previous 12 months.	Minn. R. 7007.0800, subp. 4 and 5
Monthly Calculation -- GP 004 VOC Emissions: The Permittee shall calculate monthly GP 004 VOC emissions using the following equations: GP 004 VOC Emissions (tons/month) = H - W where: $H = (A1 \times B1) + (A2 \times B2) + (A3 \times B3) + \dots$ $W = (C1 \times D1) + (C2 \times D2) + (C3 \times D3) + \dots$	Minn. R. 7007.0800, subp. 4 and 5
Monthly Calculation -- GP 004 VOC Emissions (continued): where: H = the amount of VOC used, in tons/month. A# = Amount of each VOC-containing material used in the previous month, in tons/month. B# = weight percent of VOC in A#, as a fraction (e.g., 50% is 0.50). W = the amount of VOC shipped in waste, in tons/month. C# = amount, in tons/month, of each VOC-containing waste material shipped. D# = weight percent of VOC in C#, as a fraction. If the Permittee chooses to not take credit for waste shipments, C# is zero and need not be tracked.	Minn. R. 7007.0800, subp. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: SV 021 Air-Cure Fabric Filter No. 1 (CE 001) Stack**Associated Items:** EU 005 Dust/Large Particle Cyclone/SV 021

EU 006 Dust/Large Particle (Hog) Cyclone/SV 021

EU 007 Dust/Large Particle (Hammermill/Bark) Cyclone/SV 021

EU 008 Dust/Large Particle Cyclone/SV 021

EU 011 Dust/Large Particle Cyclone/SV 021

What to do	Why to do it
EMISSION LIMITS	hdr
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
Particulate Matter < 10 micron: less than or equal to 0.0025 grains/dry standard cubic foot but not to exceed 1.873 lb PM10/hr.	Title I Condition: To avoid violation of PM10 ambient air standard
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, subp. 1(B)
CE 001 POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain CE 001 at all times that any emission unit controlled by CE 001 is in operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain CE 001 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
Visible Emissions: The Permittee shall check SV 021 for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 4 and 5
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 5.0 inches of water column for CE 001, 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 with the PM10 limit was demonstrated.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 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 whenever CE 001 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 CE 001 components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - 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 the filter.	Minn. R. 7007.0800, subp. 4, 5, and 14

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: SV 029 Air-Cure Fabric Filter No. 2 (CE 004) Stack**Associated Items:** EU 031 Woodworking Dust/Large Particle Cyclones/SV 029

What to do	Why to do it
EMISSION LIMITS	hdr
Particulate Matter < 10 micron: less than or equal to 0.0025 grains/dry standard cubic foot but not to exceed 0.64 lb PM10/hr.	Title I Condition: To avoid violation of PM10 ambient air standard
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 to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
CE 004 POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain CE 004 at all times that any emission unit controlled by CE 004 is in operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain CE 004 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
Visible Emissions: The Permittee shall check SV 029 for any visible emissions once each day of operation during daylight hours. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 4 and 5
Pressure Drop: greater than or equal to 1.0 inches of water column and less than or equal to 5.0 inches of water column for CE 004, 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 with the PM10 limit was demonstrated.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 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 whenever CE 004 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 CE 004 components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - 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 the filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
PERFORMANCE TESTING REQUIREMENTS	hdr
Performance Test: due 180 days after Permit Issuance to measure PM10 emissions from SV 029 while all woodworking processes that emit to CE 004 are operating.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7017.2020, subp. 1

TABLE A: LIMITS AND OTHER REQUIREMENTS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

Subject Item: SV 036 Carter Day Fabric Filter (CE 002) Stack**Associated Items:** EU 038 Woodworking Dust/SV 036

What to do	Why to do it
EMISSION LIMITS	hdr
Particulate Matter < 10 micron: less than or equal to 0.01 grains/dry standard cubic foot but not to exceed 0.98 lb PM10/hr.	Title I Condition: To avoid violation of PM10 ambient air standard
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 to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, subp. 1(A)
CE 002 POLLUTION CONTROL EQUIPMENT REQUIREMENTS	hdr
The Permittee shall operate and maintain CE 002 at all times that any emission unit controlled by CE 002 is in operation.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 14
The Permittee shall operate and maintain CE 002 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
Visible Emissions: The Permittee shall check SV 036 for any visible emissions once each day of operation during daylight hours, when emissions are vented through SV 036 to the atmosphere. During inclement weather, the Permittee shall read and record the pressure drop across the fabric filter, once each day of operation when emission are vented through SV 036 to the atmosphere.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 4 and 5
Pressure Drop: greater than or equal to 0.5 inches of water column and less than or equal to 3.0 inches of water column for CE 002, 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 with the PM10 limit was demonstrated.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7007.0800, subp. 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 whenever CE 002 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 CE 002 components. The Permittee shall maintain a written record of these inspections.	Minn. R. 7007.0800, subp. 4, 5 and 14
Corrective Actions: The Permittee shall take corrective action as soon as possible if any of the following occur: - visible emissions are observed; - 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 the filter.	Minn. R. 7007.0800, subp. 4, 5, and 14
PERFORMANCE TESTING	hdr
Performance Test: due 180 days after Permit Issuance to measure PM10 emissions from SV 036 while all woodworking processes that emit to CE 002 are operating.	Title I Condition: To avoid violation of PM10 ambient air standard; Minn. R. 7017.2020, subp. 1

TABLE B: SUBMITTALS

07/09/03

Facility Name: Alltrista Consumer Products Co
Permit Number: 01700003 - 001

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:

- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

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

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

What to send	When to send	Portion of Facility Affected
Testing Frequency Plan	due 60 days after Initial Performance Test for PM10. The plan shall specify a PM10 testing frequency based on the results of the initial GP 003 PM10 test and MPCA guidance. Future performance tests based on one-year (12-month), 36-month, and 60-month intervals, or as applicable, shall be required upon written approval of the MPCA. Each future test shall be conducted on a cyclone not previously tested.	GP003
Testing Frequency Plan	due 60 days after Initial Performance Test for SV 020 PM10 emissions. The plan shall specify a testing frequency based on the results of the initial SV 020 PM10 test and MPCA guidance. Future performance tests based on one-year (12-month), 36-month, and 60-month intervals, or as applicable, shall be required upon written approval of the MPCA.	GP002
Testing Frequency Plan	due 60 days after Initial Performance Test for SV 029 PM10 emissions. The plan shall specify a testing frequency based on the results of the initial SV 029 PM10 test and MPCA guidance. Future performance tests based on one-year (12-month), 36-month, and 60-month intervals, or as applicable, shall be required upon written approval of the MPCA.	SV029
Testing Frequency Plan	due 60 days after Initial Performance Test for SV 036 PM10 emissions. The plan shall specify a testing frequency based on the results of the initial SV 036 PM10 test and MPCA guidance. Future performance tests based on one-year (12-month), 36-month, and 60-month intervals, or as applicable, shall be required upon written approval of the MPCA.	SV036

TABLE B: RECURRENT SUBMITTALS

07/09/03

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003 - 001

What to send	When to send	Portion of Facility Affected
Excess Emissions/Downtime Reports (EER's)	due 30 days after end of each calendar quarter following Initial Startup of the Monitor (submit Deviations Reporting Form DRF-1 as amended). The EER shall indicate all periods of COMS bypass and all periods of exceedances of the opacity limit including exceedances allowed by an applicable standard, i.e. during startup, shutdown, and malfunctions.	GP002
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Compliance Certification	due 30 days after end of each calendar year following Permit Issuance (for the previous calendar year). The Certification shall be submitted to the Commissioner on a form approved by the Commissioner. This certification covers all deviations experienced during the calendar year.	Total Facility

APPENDIX MATERIAL

Facility Name: Alltrista Consumer Products Co

Permit Number: 01700003-001

February 2003 Diamond Brands/Alltrista Consumer Products PM₁₀ Modeling Protocol

SV #	Emission Unit Name	UTM Easting (m)	UTM Northing (m)	Base Elevation (m)	Stack Height (m)	Stack Temp (K)	Exit Velocity (m/s)	Stack Diameter (m)	Emission Rate (g/s)
001	Stick Polisher Cyclone	542,651.17	5,174,252.75	364.24	14.33	291.50	0.01	0.61	0.0265
002	ICS Dryer	542,657.14	5,174,260.71	364.24	10.36	363.72	0.00	1.03	0.000659
003	#1 Splint Dryer	542,650.51	5,174,259.05	364.24	14.94	344.28	0.01	0.46	0.000344
004	#2 Splint Dryer	542,655.15	5,174,255.40	364.24	14.94	347.06	0.01	0.46	0.000344
009	Stick Polisher Cyclone	542,601.76	5,174,211.30	364.24	15.85	291.50	0.01	0.70	0.0328
010	Toothpick Polisher Cyclone	542,601.76	5,174,216.60	364.24	17.07	291.50	0.01	0.70	0.0365
012	Splint Material Handling Cyclone	542,636.58	5,174,255.07	364.24	16.15	291.50	0.01	0.55	0.0403
013	Wood Veneer Dryer	542,621.12	5,174,272.98	364.24	13.72	355.39	0.01	0.46	0.00165
014	Wood Veneer Dryer	542,621.12	5,174,281.27	364.24	13.72	369.28	0.01	0.46	0.00165
015	Flat Toothpick Dryer	542,661.36	5,174,258.06	364.24	7.32	347.06	0.00	0.57	0.000396
016	ICS Seeder Cyclone	542,644.87	5,174,262.04	364.24	15.24	291.50	0.01	0.55	0.0265
019	CDS Polisher Cyclone	542,641.22	5,174,253.41	364.24	14.63	291.50	0.01	0.55	0.0346
020	Boiler #1, 2, 3, 4 Combined Stack	542,635.25	5,174,229.20	364.24	19.81	394.28	23.22	0.97	1.21

SV #	Emission Unit Name	UTM Easting (m)	UTM Northing (m)	Base Elevation (m)	Stack Height (m)	Stack Temp (K)	Exit Velocity (m/s)	Stack Diameter (m)	Emission Rate (g/s)
02 1	#1 Air-Cure Baghouse	542,631.94	5,174,255.07	364.24	12.19	291.50	24.66	1.46	0.236
02 4	Round Toothpick Pointing Cyclone	542,606.73	5,174,211.30	364.24	17.07	291.50	0.01	0.20	0.0181
02 5	Round Toothpick Pointing Reclaim Cyclone	542,606.73	5,174,216.93	364.24	16.46	291.50	0.01	0.11	0.00572
02 6	Toothpick Pointing Cyclone	542,601.76	5,174,226.88	364.24	16.76	291.50	24.43	0.20	0.0181
02 7	Toothpick Pointing Cyclone	542,601.76	5,174,221.91	364.24	16.76	291.50	24.43	0.20	0.0181
02 9	#2 Air-Cure Baghouse	542,616.02	5,174,215.28	364.24	13.72	291.50	10.83	1.29	0.0810
03 0	Toothpick Dryer	542,638.24	5,174,261.71	364.24	13.72	308.17	10.58	0.56	0.000344
03 1	Craft Dryer	542,642.22	5,174,258.39	364.24	13.72	308.17	10.58	0.56	0.000344
03 2	Large Toothpick Dryer	542,645.75	5,174,254.89	364.24	13.72	308.17	10.58	0.56	0.000344
03 3	Splint Transfer Cyclone	542,635.14	5,174,249.04	364.24	15.24	291.50	8.93	0.51	0.0403
03 4	Shapes Transfer Cyclone	542,640.32	5,174,247.21	364.24	15.24	291.50	8.23	0.51	0.0265
03 5	Large TP Material Handling Cyclone	542,596.74	5,174,235.63	364.24	15.24	291.50	8.93	0.51	0.0265
03 6	Carter Day Baghouse	542,616.02	5,174,226.88	364.24	10.06	291.50	0.01	0.69	0.124

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 01700003-001

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number	Facility Address (SIC Code: 3999)
Hearthmark, Inc. d/b/a Alltrista Consumer Products Company 345 South High Street Suite 201 P.O. Box 2729 Muncie, IN 47307-0729	1800 Cloquet Avenue Cloquet, Carlton County Rick Pomroy, Plant Manager (218) 878-2714 Patrick Wippler, Manager of Manufacturing Engineering (218) 878-2744

1.2. Description of the facility

This facility uses birch and aspen logs to produce wooden matches, toothpicks, ice cream sticks, and corn dog sticks. Green logs are de-barked and peeled/veneered to produce blanks that are then dried, shaped, and polished into various products. Coloring is applied to some toothpicks. Wood dust emissions are controlled by cyclones and baghouses. Three types of cyclones are used: material handling cyclones to capture product, large particle cyclones, and dust cyclones (listed in order of descending particulate size). The large particle and dust cyclones are vented to baghouses. Waste sawdust and bark is burned in 4 wood-fired Dutch oven boilers to produce steam for drying and heating. Boiler particulate matter emissions are controlled by a wet cyclonic separator. The Permittee also operates a print shop.

1.3 Description of any changes allowed with this permit issuance

This permit authorizes installation of toothpick and wood craft shapes processing equipment and dryers. The equipment will be composed of woodworking equipment (emissions vented to a new baghouse), material handling cyclones, and three dryers. Some of the new equipment is equipment from an existing plant that was shut down.

1.4 Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Not Applicable

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	Pb tpy	Methyl Ethyl Ketone tpy	All HAPs tpy
Total Facility Limited Potential Emissions	111.5	69.7	3.52	30.8	84.0	94.6	0.01	4.64	13.14
Total Facility Actual Emissions*	34.3	27.8	0.52	10.5	98.4	3.83	NR	NR	NR

*2001 Emission Inventory data. Note limited CO emissions are less than the 2001 actual CO emissions, due to a change in the emission factor used to calculate actual emissions and limited potential emissions. 2001 actual emissions were calculated with a now out-of-date emission factor whereas limited CO was calculated based on the current AP-42 emission factor.

Table 2. Facility and Permit Classification

Classification	Major/Affected Source	*Synthetic Minor	*Minor
PSD			PM, PM ₁₀ , SO ₂ , CO, NO _x , Pb, VOC
Part 70 Permit Program		PM ₁₀ , VOC	SO ₂ , Single and Total HAPs, Pb, NO _x , CO

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

2. Regulatory and/or Statutory Basis

Summary Regulatory and/or Statutory Basis of the Emission or operational Limit

Regulatory Overview of Facility

Permit Action Number: 01700003-001

Date: 12/4/2003

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*EU, GP, or SV #	Applicable Regulations	**Comments:
GP 001 GP 002 GP 003 SV 021 SV 029 SV 036	Title I Condition: To avoid violation of PM ₁₀ ambient air standard, and exceedance of PM ₁₀ increment	PM ₁₀ emission limits to avoid violation of PM ₁₀ NAAQS or exceedance of the PM ₁₀ increment
GP 002 GP 003 SV 029 SV 036	Title I Condition: To avoid violation of PM ₁₀ ambient air standard, and exceedance of PM ₁₀ increment	PM ₁₀ Performance stack testing
GP 004	Minn. R. 7007.0800, subp. 2 to avoid major source classification under 40 CFR 70.2	VOC usage limit and associated monitoring and recordkeeping requirements

3. Technical Information

Facility Status: This facility is a synthetic minor Part 70 source. PM₁₀ is limited through use of control equipment, and a volatile organic compound (VOC) emission limit for VOC emissions from VOC-containing material usage restricts VOC emissions. The source is a natural minor source for New Source Review.

Ambient Air Analysis (1993 Permit): In the early 1990s, Potlatch – Cloquet applied for a PSD major modification permit. During preparation of the Prevention of Significant Deterioration (PSD) air analysis, Alltrista/Diamond Brands was identified as a particulate matter emission source that was causing or contributing to a TSP NAAQS violation, when modeling used particulate matter emission rates equivalent to the applicable limits in the Minnesota Industrial Process Equipment Rule. This problem was addressed by issuing a 1993 operating permit with particulate matter (PM) limits for each industrial process at the facility that demonstrated modeled attainment with the TSP NAAQS. The PM limits were also based on stack testing conducted in 1991 on a representative cyclone from each of the three cyclone categories (testing was conducted in part to develop emission factors for these processes, as they are not available from U.S. Environmental Protection Agency). In addition, the 1993 permit required installation of a baghouse to control the dustiest cyclones, as well as testing of the baghouse to show it met 0.01 gr/dscf (limit based on modeling for TSP NAAQS compliance) and 20% opacity limits. August 1995 testing measured an emission rate of 0.001 gr/dscf and 0% opacity from the new baghouse.

Ambient Air Analysis (2003 Air Permit): As part of the proposed modification, the Permittee has submitted a particulate matter less than 10 (PM₁₀) modeling protocol and results to show that PM₁₀ ambient air standards will not be violated and the PSD PM₁₀ increment will not be

exceeded. All PM emission limits from the 1993 permit were used for the PM₁₀ emission rates for existing emissions sources except for the common boiler stack and the Air-Cure #1 baghouse. In addition, modeling-based PM limits for showing compliance with the PM MAAQS are not necessary because it is agency policy to use the PM MAAQS for ambient air monitoring purposes only (based on communications with Dennis Becker, MPCA Environmental Outcomes Division).

A PM₁₀ limit on SV 020 (common boiler stack after the scrubber), has been added. This value is the value used in the modeling for PM₁₀.

Performance testing for PM₁₀ is required for the common boiler stack because this has never been tested. The stack testing deadline is March 15, 2004, to accommodate boiler testing during the winter when maximum steam demand occurs. Testing is also required for the new Air-Cure #2 baghouse and the Carter Day baghouse because the PM₁₀ lb/hr limit for each baghouse stack/vent is equal to a concentration of 0.0025 gr PM₁₀/dscf which is achievable by a fabric filter but is still a very low limit that may be difficult to comply with. Finally, testing is required for EU 036 and EU 037 (two material handling cyclones) in GP 003, because the PM₁₀ limit for these two cyclones is equal to a concentration of 0.0064 gr/dscf (compared to 0.01 gr/dscf for all other material handling cyclones); a similar cyclone tested in 1990 had emissions measured at 0.0037 gr/dscf (see chart below), so EU 036 and EU 037 should be able to meet the applicable limit, but a demonstration of compliance is warranted.

Performance testing is not required for Air-Cure baghouse SV 021 because it was tested in 1995 at 0.001 gr of PM/dscf. Also, testing is not required for any of the dryers because the dryers are steam heated, and the product being dried does not include fine particulate matter.

The Permittee has categorized the cyclones at their facility. In order from smallest to largest particle size, they are dust cyclones, large particle cyclones, and material handling cyclones. Emissions from the dust and large particle cyclones are vented to a baghouse before venting to the atmosphere. The material handling cyclones capture product during pneumatic transport within the process line. 3 cyclones tested (by MMT) in 1990 were Nos. 5 (dust cyclone), 11 (large particle), and 16 (material handling). All dust and large particle cyclones are vented to fabric filters for additional PM/PM₁₀ control. Material handling cyclones are not control equipment because they are used to separate air from product during pneumatic transport.

	EU 005 (Dust Cyclone: Moulder Dust Cyclone)	EU 011 (Large Particle Cyclone: Splint Seeder Waste Cyclone)	EU 016 (Material Handling Cyclone: Ice Cream Seeder Cyclone)
1990 Stack Test Measured PM Emission Rate (gr/dscf)	0.0680	0.0309	0.0037

Part 70: The Facility is subject to PM₁₀ and VOC limits to avoid part 70 major source status.

Part 63 NESHAPs: This facility is a natural minor Hazardous Air Pollutant (HAP) source and therefore no MACT standards are applicable.

112g: The proposed modification is not a major source of HAPs and therefore is not subject to 112g requirements.

Minnesota Rules: All process equipment is subject to the PM and opacity limits in the Industrial Process Equipment Rule, and the boilers are subject to the PM and opacity limits in the Indirect Heating Equipment Rule.

Monitoring: The common boiler stack SV 020 is equipped with a continuous opacity monitor (COM). The COM can be appropriate monitoring to ensure that the wet cyclone separator is operating correctly, however, several additional requirements are included for inspection and corrective actions if the COM shows opacity above the limit or an inspection reveals the need for control equipment repairs. The 3 baghouses that control wood dust are subject to daily pressure drop and visible emissions monitoring requirements, as well as requirements for operation and maintenance, periodic inspection, and corrective actions. None of the material handling cyclones are monitored because they separate air from product, and have very low emissions because almost all woodworking dust is captured before the product is handled by these cyclones.

Environmental Review: No environmental review is required for this modification or this permit action.

Emission Calculations: Emission factors for this wood products industry are not readily available. The VOC emission factors for dryers at this facility was based on the VOC factor for a dryer at a similar wood processing industry. The boiler emission factors are from AP-42 chapter 1.6. All woodworking and dryer PM₁₀ sources (cyclones and baghouses) are limited by the PM₁₀ emission rates used in the PM₁₀ modeling protocol. Also, it is assumed that all PM from the woodworking and dryer sources is PM₁₀, and therefore, the PM₁₀ modeled emission rates will also be used for the PM Potential to Emit for these sources too. Although the Permittee conducted PM testing on 3 cyclones in 1990, this test data is almost 13 years old and will not be used for emission calculations. However, this data can be used to help determine whether or not the existing and proposed PM₁₀ limits for the material handling cyclones can likely be met.

Steam-heated dryers VOC emission factor: The Permittee uses aspen and birch which are hardwoods which tend to emit less VOC when heated than softwoods. The 1993 total facility permit used a VOC factor for a Hardboard Coe dryer of 1.0 lb VOC/ton of dried product obtained from AIRS (EPA 450/4-90-003). The October 2002 AP-42 Table 10.6.4-3 lists 0.27 lb VOC (as propane) per ton of dried hardwood, for an indirect heated second stage hardboard tube dryer (first stage are all listed as direct fired, therefore VOC from combustion products are part of the first stage VOC emission factor). The June 2002 AP-42 table 10.6.2-3 lists 0.30 lb VOC (as propane) per ton of dried softwood, for an indirect heated particle board rotary dryer. AP-42 Table 10.5-8 (plywood chapter) lists wood species used in composites wood manufacturing.

Aspen and birch are used in hardboard/fiberboard and engineered wood products. Aspen is also used in OSB and particle board. The 0.3 lb/ton factor from AP-42 table 10.6.2-3 for an indirect heated particle board rotary dryer was used for VOC emission calculations to conservatively estimate dryer VOC emissions.

The Carter Day baghouse (CE 002) can vent indoors or outdoors. The 1993 permit indicated CE 002 could only vent indoors, but this was incorrect.

CAM Applicability 40 CFR Part 64: This facility is not a major source under part 70 and therefore CAM does not apply.

No comments were received during the public comment period.

4. Conclusion

Based on the information provided by Alltrista Consumer Products, Inc. the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 01700003-001 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: Marshall Cole, Bob Beresford, Jenny Reinertsen (peer review)

Attachment: Emissions Data