

DRAFT/PROPOSED

AIR EMISSION PERMIT NO. 12300057- 003
Total Facility Operating Permit - Reissuance

IS ISSUED TO

RAYVEN INC
431 Griggs Street North
St. Paul, Ramsey County, Minnesota 55104

The emission units, control equipment and emission stacks at the stationary source authorized in this permit reissuance are as described in the Permit Applications Table.

This permit reissuance supersedes Air Emission Permit No. 12300057-002, and authorizes the Permittee to operate the stationary source at the address listed above unless otherwise noted in Table A. The Permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Unless otherwise indicated, all the Minnesota rules cited as the origin of the permit terms are incorporated into the SIP under 40 CFR § 52.1220 and as such as are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

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

Operating Permit Issue Date: <issue date>

Expiration Date: <expiration date> – All Title I Conditions do not expire.

Don Smith, P.E., Manager
Air Quality Permits Section
Industrial Division

for John Linc Stine
Commissioner
Minnesota Pollution Control Agency

Permit Applications Table

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Total Facility Operating Permit Reissuance	August 7, 2006	002

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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:

Rayven, Inc. operates a full-service imageable film products manufacturing facility in St. Paul, Ramsey County, Minnesota. The Facility handles all aspects of the production processes including coating, printing, laminating, slitting and sheeting (converting), packaging and shipping. The Permittee's manufacturing processes include surface coating with pressure sensitive adhesives to produce tapes and labels. Each coating line at this Facility is an "affected facility" (per 40 CFR pt. 60, subp. RR).

The Facility has taken limits on emissions of volatile organic compounds to avoid major source classification for New Source Review (40 CFR § 52.21). The Facility has also taken limits on the emissions of hazardous air pollutants to avoid major source classification for the National Emissions Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR pt. 63). However, the Facility is a major source under the federal operation permits program (40 CFR pt. 70).

Two of the coating lines have wide-web flexographic printing capability and are subject to limits under 40 CFR pt. 63, subp. KK.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 04/04/13

Facility Name: Rayven Inc
 Permit Number: 12300057 - 003

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
SOURCE-SPECIFIC REQUIREMENTS	hdr
Permit Appendices: This permit contains appendices as listed in the permit Table of Contents. The Permittee shall comply with all requirements contained in the appendices.	Minn. R. 7007.0800, subp. 2
OPERATIONAL REQUIREMENTS	hdr
The Permittee shall comply with National Primary and Secondary Ambient Air Quality Standards, 40 CFR pt. 50, and the Minnesota Ambient Air Quality Standards, Minn. R. 7009.0010 to 7009.0080. Compliance shall be demonstrated upon written request by the MPCA.	Minn. Stat. Section 116.07, subds. 4a & 9; Minn. R. 7007.0100, subp. 7(A), 7(L), & 7(M); Minn. R. 7007.0800, subps. 1, 2 & 4; Minn. R. 7009.0010-7009.0080
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.	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, subps. 14 and 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
PERFORMANCE TESTING	hdr
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

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Table A of the permit. See Table B for additional testing requirements.</p> <p>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</p> <p>The Notification, Test Plan, and Test Report may be submitted in an alternative format as allowed by Minn. R. 7017.2018.</p>	<p>Minn. R. 7017.2018; Minn. R. 7017.2030, subps. 1-4, Minn. R. 7017.2035, subps. 1-2</p>
<p>Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as stated in the MPCA's Notice of Compliance letter granting preliminary approval. Preliminary approval is based on formal review of a subsequent performance test on the same unit as specified by Minn. R. 7017.2025, subp. 3. The limit is final upon issuance of a permit amendment incorporating the change.</p>	<p>Minn. R. 7017.2025, subp. 3</p>
MONITORING REQUIREMENTS	hdr
<p>Monitoring Equipment Calibration: The Permittee shall calibrate all required monitoring equipment at least once every 12 months (any requirements applying to continuous emission monitors are listed separately in this permit).</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 4(D)</p>
RECORDKEEPING	hdr
<p>Recordkeeping: Retain all records at the stationary source, unless otherwise specified within this permit, 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).</p>	<p>Minn. R. 7007.0800, subp. 5(C)</p>
<p>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.</p>	<p>Minn. R. 7007.0800, subp. 5(B)</p>
<p>If the Permittee determines that no permit amendment or notification is required prior to making a change, the Permittee must retain records of all calculations required under Minn. R. 7007.1200. For expiring permits, these records shall be kept for a period of five years from the date the change was made or until permit reissuance, whichever is longer. The records shall be kept at the stationary source for the current calendar year of operation and may be kept at the stationary source or office of the stationary source for all other years. The records may be maintained in either electronic or paper format.</p>	<p>Minn. R. 7007.1200, subp. 4</p>
REPORTING/SUBMITTALS	hdr
<p>Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.</p> <p>At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.</p>	<p>Minn. R. 7019.1000, subp. 3</p>

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-3**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

<p>Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.</p> <p>At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.</p>	Minn. R. 7019.1000, subp. 2
<p>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.</p>	Minn. R. 7019.1000, subp. 1
<p>Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description:</p> <ol style="list-style-type: none"> 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation. 	Minn. R. 7019.1000, subp. 1
<p>Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.</p>	Minn. R. 7007.1150 - 7007.1500
<p>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). Performance testing deadlines from the General Provisions of 40 CFR pt. 60 and pt. 63 are examples of deadlines for which the MPCA does not have authority to grant extensions and therefore do not meet the requirements of Minn. R. 7007.1400, subp. 1(H).</p>	Minn. R. 7007.1400, subp. 1(H)
<p>Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance, to be submitted on a form approved by the Commissioner.</p>	Minn. R. 7019.3000 - 7019.3100
<p>Emission Fees: due 30 days after receipt of an MPCA bill.</p>	Minn. R. 7002.0005 - 7002.0095

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-4**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

Subject Item: GP 001 Total Facility VOC Limits**Associated Items:** EU 001 Coating Line 1 (Blue Line)

EU 003 Coating Line 3 (Silicone Line)

EU 005 Coating Line 5 (Black Line)

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
<p>Volatile Organic Compounds: less than or equal to 200 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described in GP 001. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001.</p> <p>All non-combustion VOC-emitting equipment at the Facility is subject to this limit except for insignificant activities.</p> <p>The calculation of VOCs used may take into account recovered/recycled VOCs as described under the Waste Credit requirement in GP 001.</p>	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 & Minn. R. 7007.3000
<p>HAPs - Total: less than or equal to 24.0 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described in GP 001. HAP contents for each HAP-containing material (i.e. coatings, cleaners, etc.) shall be determined as described under the Material Content requirement in GP 001.</p> <p>All non-combustion HAP-emitting equipment at the Facility is subject to this limit except for insignificant activities.</p>	Title I Condition: To avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2)
<p>HAP-Single: less than or equal to 9.0 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described in GP 001. HAP contents for each HAP-containing material (i.e. coatings, cleaners, etc.) shall be determined as described under the Material Content requirement in GP 001.</p> <p>All non-combustion HAP-emitting equipment at the Facility is subject to this limit except for insignificant activities.</p>	Title I Condition: To avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2)
<p>VOC and HAP PreCaps:</p> <p>If the Permittee replaces any existing non-combustion VOC and/or HAP-emitting equipment, adds new non-combustion VOC and/or HAP emitting equipment, or modifies the existing equipment listed in GP 001, such equipment is subject to the above VOC and HAP permit limits as well as all of the requirements of GP 001. Prior to making such a change, the Permittee shall apply for and obtain the appropriate permit amendment, as applicable. The Permittee is not required to repeat VOC calculations described in Minn. R. 7007.1200, subp. 2.</p> <p>A permit amendment will still be needed regardless of the emissions increase if the change will be subject to a new applicable requirement or requires revisions to the limits or monitoring and recordkeeping in this permit.</p>	Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 and Minn. R. 7007.3000; to avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2)
MONITORING AND RECORDKEEPING	hdr
<p>Monthly Recordkeeping -- VOC Emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <ol style="list-style-type: none"> 1) The total usage of VOC-containing cleanup materials for the previous calendar month using the methods and formulas specified in GP 001. This record shall also include the VOC content of each material as determined by the Material Content requirement of this permit. 2) The total usage of VOC-containing coating materials for the previous calendar month using the daily and monthly usage records required at each Coating Line. This record shall also include the VOC content of each material as determined by the Material Content requirement of this permit. 3) The VOC emissions for the previous month by using the formulas specified in GP 001. 4) 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. 	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-5**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

<p>Monthly Recordkeeping -- VOC in Cleanup Materials. By the 15th of the month, the Permittee shall calculate and record the following:</p> <p>1) The total quantity, in tons, of cleanup materials used at the Facility for the previous month using purchase records.</p> <p>2) The total VOC used in cleanup materials, in tons/month, for the previous month using the following method:</p> <p>Cleanup VOCs = (A1 x B1) + (A2 x B2) + (A3 x B3) +</p> <p>where:</p> <p>A# = amount of each cleanup material used in the previous month, in tons/month; and</p> <p>B# = weight percent of VOC in A#, as a fraction.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Monthly Calculation -- VOC Emissions. The Permittee shall calculate VOC emissions using the following equations:</p> <p>VOC (tons/month) = V - W</p> <p>V = Cleanup VOCs + (A1 x B1) + (A2 x B2) + (A3 x B1) +</p> <p>W = (C1 x D1) + (C2 x D2) + (C3 x D3) +</p> <p>where:</p> <p>V = total VOC used in tons/month;</p> <p>A# = amount, in tons/month, of each VOC-containing coating applied at each Coating Line in the previous month;</p> <p>B# = weight percent of VOC in A#, as a fraction (e.g., 50% is 0.50);</p> <p>Cleanup VOCs = total amount of VOC used in cleanup materials at the Facility, in tons/month, calculated as specified earlier in this permit;</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>Monthly Recordkeeping - HAP Emissions. By the 15th of the month, the Permittee shall calculate and record the following using the formulas specified in this permit:</p> <p>1) The total HAP-containing cleanup and coating materials used in the previous calendar month using the daily and monthly usage records required at each Coating Line and for GP 001 (monthly cleanup records). This record shall also include the individual and total HAP contents of each HAP-containing cleanup and coating material used in the previous month, as determined by the Material Content requirement of this permit;</p> <p>2) The total and individual HAP emissions for the previous month using the formulas specified in GP 001; and</p> <p>3) The 12-month rolling sum total and individual HAP usage for the previous 12-month period by summing the monthly emissions data for the previous 12 months.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Monthly Calculation -- HAP Emissions. The Permittee shall calculate each individual HAP and total HAP emissions using the following equation:</p> <p>HAP (tons/month) = (A1 x B1) + (A2 x B2) + (A3 x B3) +</p> <p>Where:</p> <p>HAP = the amount of each pollutant (either total HAP or each individual HAP), used, in tons/month;</p> <p>A# = Amount of each HAP-containing material used in the previous month, in tons/month; and</p> <p>B# = weight percent of each individual or total HAP in A#, as a fraction (e.g., 50% is 0.50).</p>	40 CFR Section 63.829(d); Minn. R. 7007.0800, subps. 4 and 5
<p>Material Content: VOC and HAP contents in coating and cleanup 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 and HAP contents. The Commissioner reserves the right to require the Permittee to determine the VOC and HAP contents 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.</p>	40 CFR Section 63.829(d); Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-6**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

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 content for each credited shipment. 1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, excluding water. 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 content of any of the materials.	Minn. R. 7007.0800, subps. 4 and 5
Maximum Contents of Materials: The Permittee assumed certain worst-case contents of materials when determining the short term potential to emit of units in GP 001. These assumptions are listed in Appendix II of this permit. Changing to a material that has a higher content of any of the given pollutants is considered a change in method of operation that must be evaluated under Minn. R. 7007.1200, subp. 3 to determine if a permit amendment or notification is required under Minn. R. 7007.1150.	Minn. R. 7005.0100, subp. 35a

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

Subject Item: GP 002 Coating Line Combustion Requirements**Associated Items:** EU 001 Coating Line 1 (Blue Line)

EU 003 Coating Line 3 (Silicone Line)

EU 005 Coating Line 5 (Black Line)

What to do	Why to do it
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.	Minn. R. 7011.0610, subp. 1(A)(2)
Fuel Type: natural gas or propane, by design.	Minn. R. 7005.0100, subp. 35a
The Permittee shall keep records of fuel purchases.	Minn. R. 7007.0800, subp. 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-8**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

Subject Item: EU 001 Coating Line 1 (Blue Line)

Associated Items: GP 001 Total Facility VOC Limits
 GP 002 Coating Line Combustion Requirements
 SV 001 Coater 1 Dryer (Blue Line)
 SV 008 Coater 1 Corona Treater

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
This Coating Line is an affected facility (per 40 CFR Section 60.440) which has taken limits to avoid the emissions limits in 40 CFR Section 60.442(a). If the VOC input exceeds the 49 ton per year limit in any 12-month period, the coating line is then subject to additional requirements in 40 CFR pt. 60, subp. RR, and the Permittee must obtain the appropriate permit amendment to add these requirements to the permit.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
Volatile Organic Compounds: less than or equal to 49.0 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described later at EU 001. This limit is on all solvent applied in the coating. This means all organic solvent contained in the adhesive, release, and precoat formulations that are metered into the coating applicator from the formulation area.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
MONITORING AND RECORDKEEPING	hdr
Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain the quantity of each coating applied at Coating Line 1. This shall be based on usage logs or production records, which include batch quantities and formulation specifications.	Title I Condition: To avoid classification as major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2); Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping -- VOC Applied in Coatings. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total tons of each coating used in the previous month using the daily records and formulation specifications required by this permit; 2) The VOC applied in coatings for the previous month using the formulas specified at EU 001; and 3) The 12-month rolling sum VOC applied in coatings for the previous 12-month period by summing the monthly VOC application data for the previous 12 months.	40 CFR Section 60.445(d); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used at Coating Line 1 and the results of the reference test methods specified in 40 CFR Section 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.	40 CFR Section 60.445(a); Minn. R. 7011.2560
Monthly Calculations -- VOC Applied in Coatings. The Permittee shall calculate the VOC applied in coatings, in tons/month, by the 15th of the month for the previous month using the following method: $\text{VOC} = (W1 \times M1) + (W2 \times M2) + (W3 \times M3) + \dots$ where: M# = the total mass, in tons, of each coating (#) applied during the calendar month; and W# = the weight fraction of volatile organics in coating M#. The value of W# shall be obtained from either a U.S. EPA Reference Method 24 test or manufacturer's formulation data.	40 CFR Sections 60.445(a) and 60.446(a); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9** 04/04/13

Facility Name: Rayven Inc
 Permit Number: 12300057 - 003

Subject Item: EU 003 Coating Line 3 (Silicone Line)

Associated Items: GP 001 Total Facility VOC Limits
 GP 002 Coating Line Combustion Requirements
 SV 004 Coater 3 Dryer (Silicone Line)
 SV 010 Coater 3 Corona Treater #1
 SV 011 Coater 3 Corona Treater #2

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
This Coating Line is an affected facility (per 40 CFR Section 60.440) which has taken limits to avoid the emissions limits in 40 CFR Section 60.442(a). If the VOC input exceeds the 49 ton per year limit in any 12-month period, the coating line is then subject to additional requirements in 40 CFR pt. 60, subp. RR, and the Permittee must obtain the appropriate permit amendment to add these requirements to the permit.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
Volatile Organic Compounds: less than or equal to 49.0 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described at EU 003. This limit is on all solvent applied in the coating. This means all organic solvent contained in the adhesive, release, and precoat formulations that are metered into the coating applicator from the formulation area.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
MONITORING AND RECORDKEEPING	hdr
Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain the quantity of each coating applied at Coating Line 3. This shall be based on usage logs or production records, which include batch quantities and formulation specifications.	Title I Condition: To avoid classification as major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2); Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping -- VOC Applied in Coatings. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total tons of each coating used in the previous month using the daily records and formulation specifications required by this permit; 2) The VOC applied in coatings for the previous month using the formulas specified at EU 003; and 3) The 12-month rolling sum VOC applied in coatings for the previous 12-month period by summing the monthly VOC application data for the previous 12 months.	40 CFR Section 60.445(d); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used at Coating Line 3 and the results of the reference test methods specified in 40 CFR Section 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.	40 CFR Section 60.445(a); Minn. R. 7011.2560
Monthly Calculations -- VOC Applied in Coatings. The Permittee shall calculate the VOC applied in coatings, in tons/month, by the 15th of the month for the previous month using the following method: $\text{VOC} = (W1 \times M1) + (W2 \times M2) + (W3 \times M3) + \dots$ where: M# = the total mass, in tons, of each coating (#) applied during the calendar month; and W# = the weight fraction of volatile organics in coating M#. The value of W# shall be obtained from either a U.S. EPA Reference Method 24 test or manufacturer's formulation data.	40 CFR Sections 60.445(a) and 60.446(a); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10**

04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

Subject Item: EU 005 Coating Line 5 (Black Line)**Associated Items:** GP 001 Total Facility VOC Limits

GP 002 Coating Line Combustion Requirements

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
This Coating Line is an affected facility (per 40 CFR Section 60.440) which has taken limits to avoid the emissions limits in 40 CFR Section 60.442(a). If the VOC input exceeds the 49 ton per year limit in any 12-month period, the coating line is then subject to additional requirements in 40 CFR pt. 60, subp. RR, and the Permittee must obtain the appropriate permit amendment to add these requirements to the permit.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
Volatile Organic Compounds: less than or equal to 49.0 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period as described at EU 005. This limit is on all solvent applied in the coating. This means all organic solvent contained in the adhesive, release, and precoat formulations that are metered into the coating applicator from the formulation area.	Limit to Avoid Applicability of 40 CFR Section 60.440(b); Minn. R. 7011.2560
MONITORING AND RECORDKEEPING	hdr
Daily Recordkeeping. On each day of operation, the Permittee shall record and maintain the quantity of each coating applied at Coating Line 5. This shall be based on usage logs or production records, which include batch quantities and formulation specifications.	Title I Condition: To avoid classification as major source under 40 CFR Section 52.21 and Minn. R. 7007.3000; To avoid classification as major source under 40 CFR Section 63.2 and 63.820(a)(2); Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping -- VOC Applied in Coatings. By the 15th of the month, the Permittee shall calculate and record the following: 1) The total tons of each coating used in the previous month using the daily records and formulation specifications required by this permit; 2) The VOC applied in coatings for the previous month using the formulas specified at EU 005; and 3) The 12-month rolling sum VOC applied in coatings for the previous 12-month period by summing the monthly VOC application data for the previous 12 months.	40 CFR Section 60.445(d); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5
Monthly Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used at Coating Line 5 and the results of the reference test methods specified in 40 CFR Section 60.446(a) or the manufacturer's formulation data used for determining the VOC content of those coatings.	40 CFR Section 60.445(a); Minn. R. 7011.2560
Monthly Calculations -- VOC Applied in Coatings. The Permittee shall calculate the VOC applied in coatings, in tons/month, by the 15th of the month for the previous month using the following method: $\text{VOC} = (W1 \times M1) + (W2 \times M2) + (W3 \times M3) + \dots$ <p>where: M# = the total mass, in tons, of each coating (#) applied during the calendar month; and W# = the weight fraction of volatile organics in coating M#.</p> <p>The value of W# shall be obtained from either a U.S. EPA Reference Method 24 test or manufacturer's formulation data.</p>	40 CFR Sections 60.445(a) and 60.446(a); Minn. R. 7011.2560; Minn. R. 7007.0800, subps. 4 and 5

TABLE B: SUBMITTALS**B-1** 04/04/13

Facility Name: Rayven Inc
Permit Number: 12300057 - 003

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

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

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

Chief Air Enforcement
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send any application for a permit or permit amendment to:

Fiscal Services
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

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

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

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

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

Facility Name: Rayven Inc
Permit Number: 12300057 - 003

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**B-3** 04/04/13

Facility Name: Rayven Inc

Permit Number: 12300057 - 003

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
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). The Permittee shall submit this 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 I — Insignificant Activities and Applicable Requirements

Facility Name: Rayven Inc
Permit Number: 12300057-003

The table below lists the insignificant activities that are currently at the facility and their associated general applicable requirements.

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(B)	Furnaces, boilers, and incinerators:	
	2. fuel burning equipment with a capacity less than 420,000 Btu/hour, but only if the total combined capacity of all fuel burning equipment at the stationary source with a capacity less than 420,000 Btu/hour is less than or equal to 1,400,000 Btu/hour. <i>Rayven Inc has one process boiler with a capacity of 0.3 MMBtu/hr. The total combined capacity of all fuel burning equipment at the Facility is 1.3 MMBtu/hr.</i>	Minn. R. 7011.0515 (PM, SO ₂ , NO _x , and opacity)
3(G)	Emissions from a laboratory, as defined in the subpart. <i>Rayven Inc operates a lab.</i>	Minn. R. 7011.0715 (PM, and opacity)
3(H)	Miscellaneous:	
	3. brazing, soldering or welding equipment; <i>Rayven Inc has stated that they have brazing, soldering or welding equipment.</i>	Minn. R. 7011.0715 (PM, and opacity)

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(I)	<p>Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than:</p> <ol style="list-style-type: none"> 1. 4,000 lbs/year of carbon monoxide; 2. 2,000 lbs/year each of nitrogen oxide, sulfur dioxide, particulate matter, particulate matter less than ten microns, volatile organic compounds (including hazardous air pollutant-containing VOC), and ozone; and 3. 1,000 tons/year of CO₂e <p><i>Rayven has 3 mixers and 3 degreasers that have VOC PTEs less than 2,000 lbs/year each. The mixer VOC emissions are tracked as part of the total facility VOC emissions.</i></p> <p><i>Rayven also has two 0.5 MMBtu/hr boilers. For each boiler, the PTE of each criteria pollutant is significantly less than 2,000 lbs/year and the PTE for CO₂e is 311.3 tons/year.</i></p>	<p>Minn. R. 7011.0715 (PM, and opacity)</p> <p>Minn. R. 7011. 0515 (PM, SO₂, NO_x, and opacity)</p>
3(K)	<p>Infrequent use of spray paint equipment for routine housekeeping or plant upkeep activities not associated with primary production processes at the stationary source, such as spray painting of buildings, machinery, vehicles, and other supporting equipment.</p>	<p>Minn. R. 7011.0715 (PM, and opacity)</p>

APPENDIX II — Maximum Contents of Materials

Facility Name: Rayven Inc
Permit Number: 12300057-003

All contents are “as applied.” The tables in Appendix II give the maximum materials contents and maximum usage rates used in calculating potential to emit for units listed in GP 001, they are not limits; however, changing to a material that has a higher VOC/HAP content, or increasing the usage rate, is considered a change in method of operation that must be evaluated under Minn. R. 7007.1200, subp. 3 to determine if a permit amendment or notification is required under Minn. R. 7007.1150.

Coating Contents

	EU 001	EU 003	EU 005
	Coating Line 1 [max. weight %]	Coating Line 3 [max. weight %]	Coating Line 5 [max. weight %]
VOC	53.54	96.6	8.75
Toluene	15.20	0.00	0.00
Formaldehyde	0.10	0.00	0.00383
Naphthalene	3.65	0.00	0.00
Total HAP	18.95	0.00	0.00383

Coating Lines' Usage Rates

Emission Unit	Web Speed (1000 ft ² /hr)	Coating Weight per Web Area (lb/1000 ft ²)
001	78.0	2.53
003	158.0	1.15
005	60.0	18.85