

DRAFT/PROPOSED

AIR EMISSION PERMIT NO. 05300477-004
Total Facility Operating Permit - Reissuance

IS ISSUED TO

Ritrama Inc

RITRAMA INC

800 Kasota Avenue Southeast
Minneapolis, Hennepin County, MN 55414

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. 05300477-003 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 State Implementation Plan (SIP) under 40 CFR § 52.1220 and as such are enforceable by U.S. Environmental Protection Agency (EPA) Administrator or citizens under the Clean Air Act.

Permit Type: 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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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:

Ritrama Inc. (Facility) is a pressure sensitive film stock and transfer adhesives manufacturing facility. Activities conducted at the facility include coating substrate with coatings, raw material receiving, product storage, and shipping. The Facility uses solvent-based and water-based coatings in the coating lines.

PERMIT ACTION DESCRIPTION:**Permit Action 004 – Reissuance of Total Facility Operating Permit:**

This permit action is for the reissuance of the total facility operating permit. In addition, this permit included two MPCA initiated parameter re-openings that included updating production operating limits and setting required performance test frequency based on results of the most recent performance test (October 4, 2010) for Coating Line No. 7 RTO (CE 009/EU 007) and incorporation of 40 CFR pt. 63 subp. JJJ rules for EU 003, EU 004, and EU 007.

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-1 07/17/12

Facility Name: Ritrama Inc
 Permit Number: 05300477 - 004

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

Subject Item: Total Facility

What to do	Why to do it
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.	40 CFR pt. 60, subp. RR; 40 CFR pt. 63, subp. JJJJ; Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subps. 4 and 5
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.	40 CFR pt. 50; 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, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment. At a minimum, the O & M plan shall identify all air pollution control equipment and control practices and shall include a preventative maintenance program for the equipment and practices, a description of (the minimum but not necessarily the only) corrective actions to be taken to restore the equipment and practices to proper operation to meet applicable permit conditions, a description of the employee training program for proper operation and maintenance of the control equipment and practices, and the records kept to demonstrate plan implementation.	Minn. R. 7007.0800, 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 and/or B.	Minn. R. ch. 7017

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-2** 07/17/12

Facility Name: Ritrama Inc
 Permit Number: 05300477 - 004

<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 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 and/or B, 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. 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**

07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 - 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 on or before April 1 of each calendar year following permit issuance, to be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 - 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 - 7002.0095
The Permittee must submit a Risk Management Plan (RMP) under 40 CFR pt. 68. Each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, shall design and implement an accidental release prevention program. An initial RMP must be submitted no later than the latest of the following dates: 1) June 21, 1999; 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or 3) The date on which a regulated substance is first present above a threshold quantity in a process. A full update and resubmission of the RMP is required at least once every five years. The five-year anniversary date is reset whenever your facility fully updates and resubmits their RMP. Submit RMPs to the Risk Management Plan Reporting Center, P.O. Box 1515, Lanham-Seabrook, Maryland 20703-1515. RMP information may be obtained at http://www.epa.gov/swercepp or by calling 1-800-424-9346.	40 CFR pt. 68

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-4 07/17/12

Facility Name: Ritrama Inc
 Permit Number: 05300477 - 004

Subject Item: GP 001 40 CFR Section 63, Subp. JJJJ Affected Units

Associated Items: EU 003 Coating Line C-3
 EU 004 Coating Line C-6
 EU 007 Coating Line C-7

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
For the thermal oxidizer used to comply with 40 CFR pt. 63, subp. JJJJ, the Permittee shall comply with the applicable operating limits established according to 40 CFR Section 63.3360(e)(3)(i). See CE 009 for additional limits, monitoring, and recordkeeping.	40 CFR Section 63.3321(a); Minn. R. 7011.7385
HAPs - Organic: less than or equal to 4.0 percent by weight of the mass of coating materials applied for each calendar month for the collection of all web coating lines (as defined in 40 CFR Section 63.3310). (less than 4.0% organic HAP by weight of the mass of applied materials).	40 CFR Section 63.3320(b)(2); Minn. R. 7011.7385
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. HAP contents for each HAP-containing material (i.e. coatings, solvents, cleaners,...) shall be determined as described under the Material Content requirement in GP 001. The calculation of HAP usage may take into account recovered/recycled HAPs as described under the Waste Credit requirement in GP 001.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2
HAPs - Total: less than or equal to 22.5 tons/year using 12-month Rolling Sum to be calculated by the 15th day of each month for the previous 12-month period. HAP contents for each HAP-containing material (i.e. coatings, solvents, cleaners,...) shall be determined as described under the Material Content requirement in GP 001. The calculation of HAPs used may take into account recovered/recycled HAPs as described under the Waste Credit requirement in GP 001.	Title I Condition: To avoid major source classification under 40 CFR Section 63.2
Volatile Organic Compounds: less than or equal to 225 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 in this permit. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001. The calculation of VOCs used may take into account recovered/recycled VOCs as described under the Waste Credit requirement in GP 001.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000
MONITORING AND RECORDKEEPING (see CE 009 for additional requirements)	hdr
Bypass and coating use monitoring: The Permittee must monitor bypasses of control device CE 009 and the mass of each coating material applied at each work station associated with these control devices during each bypass. The Permittee must demonstrate that any coating material applied on a never-controlled or an intermittently-controlled work station operated in bypass mode is allowed in the compliance demonstration according to 40 CFR Section 63.3370(n) and (o).	40 CFR Section 63.3350(c); Minn. R. 7011.7385
Bypass Monitoring on CE 009: The Permittee must install, calibrate, maintain, and operate according to the manufacturer's specifications a flow control position indicator that provides a record indicating whether the exhaust stream from the dryer was directed to the control device or was diverted from the control device. A flow control position indicator must be installed at the entrance to any bypass line that could divert the exhaust stream away from the control device to the atmosphere.	40 CFR Section 63.3350(c)(1); Minn. R. 7011.7385
Bypass Monitoring Continued: The Permittee shall record the following for each flow control position indicator: 1) the time and flow control position, at least once per hour; and 2) the time and flow control position every time the flow direction is changed.	40 CFR Section 63.3350(c)(1); Minn. R. 7011.7385

TABLE A: LIMITS AND OTHER REQUIREMENTS
A-5 07/17/12

Facility Name: Ritrama Inc
Permit Number: 05300477 - 004

<p>The Permittee must install, operate, and maintain each continuous parameter monitoring system (CPMS) according to the following requirements:</p> <p>1) The Permittee must record the results of each inspection, calibration, and validation check of the indicator.</p> <p>2) At all times, the Permittee must maintain the monitoring system in proper working order including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.</p> <p>3) Except for monitoring malfunctions, associated repairs, or required quality assurance or control activities (including calibration checks or required zero and span adjustments), the Permittee must conduct all monitoring at all times that the unit is operating. Data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities shall not be used for purposes of calculating the emissions concentrations and percent reductions specified in 40 CFR Section 63.3370.</p>	<p>40 CFR Section 63.3350(e)(5)-(7); Minn. R. 7011.7385</p>
<p>Continued</p> <p>The Permittee must use all the valid data collected during all other periods in assessing compliance of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring system to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.</p>	<p>40 CFR Section 63.3350(e)(5)-(7); Minn. R. 7011.7385</p>
<p>The Permittee shall comply with the requirements of 40 CFR Section 63.3350(d), (e), and (f) for each applicable control device and capture systems. See CE 009 for the individual requirements.</p>	<p>40 CFR Section 63.3350(d), (e), and (f); Minn. R. 7011.7385</p>
<p>The Permittee shall maintain the following records on a monthly basis:</p> <p>(1) Records specified in 40 CFR Section 63.10(b)(2) of all measurements need to demonstrate compliance, including:</p> <p>(i) control device and capture system operating parameter data in accordance with 40 CFR Section 63.3350(c), (e), and (f);</p> <p>(ii) overall control efficiency determination using capture efficiency and control device destruction or removal efficiency test results in accordance with 40 CFR Section 63.3360(e) and (f);</p> <p>(continued below)</p>	<p>40 CFR Section 63.3410(a); 40 CFR Section 63.10(b)(1); Minn. R. 7011.7385</p>
<p>(iii) material usage, organic HAP usage, volatile matter usage, and coating solids usage (as required elsewhere in Table A) and compliance demonstrations using these data in accordance with 40 CFR Section 63.3370(d).</p> <p>(2) Records specified in 40 CFR Section 63.10(c) for each CMS operated in accordance with 40 CFR Section 63.3350(b).</p>	<p>40 CFR Section 63.3410(a); 40 CFR Section 63.10(b)(1); Minn. R. 7011.7385</p>
<p>Daily Recordkeeping. On each day of operation, the Permittee shall calculate, record, and maintain the total quantity of all coatings and other VOC, solids (as required elsewhere in Table A), and HAP containing materials used at the facility. This shall be based on written or electronic usage logs and delivery records.</p>	<p>Title I Condition: To avoid major source classification under 40 CFR 52.21 and 63.2; Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 4 and 5</p>
<p>Monthly Recordkeeping -- VOC Emissions.</p> <p>By the 15th of the month, the Permittee shall calculate and record the following:</p> <p>1) The total usage of VOC-containing materials for the previous calendar month using the daily usage records. This record shall also include the VOC and solids contents (as required elsewhere in Table A) of each material as determined by the Material Content requirement of this permit;</p> <p>2) The VOC emissions for the previous month using the formulas specified in this permit; and</p> <p>3) The 12-month rolling sum VOC emissions for the previous 12-month period by summing the monthly VOC emissions data for the previous 12 months.</p>	<p>Minn. R. 7007.0800, subps. 4 and 5</p>
<p>Monthly Calculation -- VOC Emissions.</p> <p>The Permittee shall calculate VOC emissions using the following equations:</p> <p>VOC emissions (tons/month) = V - W + Constant</p> <p>VOC emissions (tons/month, Coating Line C-7) = (V - W) * (1 - CE) + Constant</p> <p>V = (A1 x B1) + (A2 x B2) + (A3 x B3) +</p> <p>W = (C1 x D1) + (C2 x D2) + C3 x D3) +</p>	<p>Minn. R. 7007.0800, subps. 4 and 5</p>

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

07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

<p>Monthly VOC Emissions Calculation Continued:</p> <p>where: V = total VOC used in tons/month; A# = amount of each VOC-containing material used, in tons/month; B# = weight percent VOC in A#, as a fraction; W = the amount of VOC shipped in waste, in tons/month; 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; D# = weight percent of VOC in C#, as a fraction; CE = VOC control efficiency of the regenerative thermal oxidizer (CE 009), as a fraction; and Constant = the value from the table in Appendix D that represents VOC emissions in tons/month from combustion units EU 003, EU 004, and EU 007.</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 materials used in the previous calendar month using the daily usage records. This record shall also include the individual and total HAP contents of each HAP-containing 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 this permit; and</p> <p>3). The 12-month rolling sum total and individual HAP emissions 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 equations:</p> <p>HAP Emissions (tons/month) = H - W + Constant HAP Emissions (tons/month, Coating Line C-7) = (H - W) * (1 - CE) + Constant</p> <p>H = (A1 x B1) + (A2 x B2) + (A3 x B3) + W = (C1 x D1) + (C2 x D2) + (C3 x D3) +</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Monthly HAP Emissions Calculation Continued:</p> <p>Where: H = the amount of each pollutant (either total HAP or each individual HAP), used, in tons/month; A# = Amount of each HAP-containing material used in the previous month, in tons/month; B# = weight percent of each individual or total HAP in A#, as a fraction (e.g., 50% is 0.50); W = the amount of each pollutant (either total HAP or each individual HAP) shipped in waste, in tons/month; C# = amount, in tons/month, of each HAP-containing waste material shipped. If the Permittee chooses to not take credit for waste shipments, this parameter would be zero; D# = weight percent of each individual or total HAP in C#, as a fraction; CE = HAP control efficiency of the regenerative thermal oxidizer (CE 009), as a fraction; and Constant = the value from the table in Appendix D that represents HAP emissions (either total HAP or each individual HAP) in tons/month from combustion units EU 003, EU 004, and EU 007.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Material Content. VOC and HAPs contents in coating materials shall be determined by the Material Safety Data Sheet (MSDS) provided by the supplier for each material used. If a material content range is given on the MSDS, the highest number in the range shall be used in all compliance calculations. Other alternative methods approved by the MPCA may be used to determine the VOC and HAPs. The Commissioner reserves the right to require the Permittee to determine the VOC, HAP, and solids 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>	Minn. R. 7007.0800, subps. 4 and 5

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-7** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

<p>Waste Credit: If the Permittee elects to obtain credit for VOC, solids, and/or HAPs shipped in waste materials, the Permittee shall either use item 1 or 2 to determine the VOC, solids, and/or individual and total HAP content for each credited shipment.</p> <p>1) The Permittee shall analyze a composite sample of each waste shipment to determine the weight content of VOC, solids, each individual HAP, and total HAP, excluding water.</p> <p>2) The Permittee may use supplier data for raw materials to determine the VOC, solids, and total and individual HAP contents 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, solids, and total and individual HAP content of any of the materials.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Maximum Contents of Materials: The Permittee assumed certain worst-case contents of materials when determining the short term potential to emit of units in GP001. These assumptions are listed in Appendix C 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.</p>	Minn. R. 7005.0100, subp. 35a
NESHAP MONITORING AND RECORDKEEPING	hdr
<p>The Permittee is using a combination of compliant coatings and one or more intermittently-controlled work stations. The Permittee must demonstrate that the average equivalent organic HAP emission rate does not exceed 0.04 kg organic HAP per kg coating materials on a monthly average as-applied basis using the procedures set forth in this permit (from 40 CFR Section 63.3370(g) and (n)).</p>	40 CFR Section 63.3370(a)(6)(ii); Minn. R. 7011.7385
<p>By the end of each calendar month, the Permittee shall calculate the following for the previous calendar month:</p> <p>1) the total organic HAP emitted by summing the HAP emissions calculated for all units subject to 40 CFR pt. 63, subp. JJJJ as detailed earlier in this permit (EU 003, EU 004 and EU 007);</p> <p>2) the total mass of each as-purchased coating material applied during the month;</p> <p>3) the total mass of each material added to as-purchased coating material during the month;</p> <p>and</p> <p>3) the total organic HAP emission rate based on coating materials applied using Equation 10 of Appendix A of this permit.</p>	40 CFR Section 63.3370(n)(5); Minn. R. 7011.7385
<p>The affected source is in compliance with the emission standards in 40 CFR Section 63.3320(b) for the month if all operating parameters required to be monitored were maintained at the values established under 40 CFR Sections 63.3350 and 63.3360 and if the total mass of organic HAP emitted by the affected source based on material applied is no more than 0.04 kg organic HAP per kg coating materials applied.</p>	40 CFR Section 63.3370(n)(6); Minn. R. 7011.7385
<p>The Permittee shall comply with the provisions of subpart A of 40 CFR pt. 63 that apply to 40 CFR pt. 63, subp. JJJJ.</p>	40 CFR Section 63.3340; Minn. R. 7011.7385
REPORTING	hdr
<p>Content of Semiannual Compliance Status Report: At a minimum, the report shall include:</p> <p>1) Company name and address;</p> <p>2) A statement by a responsible official with that official's name, title, and signature certifying the accuracy of the content of the report;</p> <p>3) Date of report and beginning and ending dates of the reporting period;</p> <p>4) If there are no deviations from any emission limitations (emission limit or operating limit) that apply to you, a statement that there were no deviations from the emission limitations during the reporting period, and that no CMS was inoperative, inactive, malfunctioning, out-of-control, repaired, or adjusted; and</p> <p>5) For each deviation from an emission limitation (emission limit or operating limit) that applies to you, the information listed in 40 CFR Section 63.3400(c)(2)(v)(A)-(C).</p>	40 CFR Section 63.3400(c)(2); Minn. R. 7011.7385

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

07/17/12

Facility Name: Ritrama Inc
Permit Number: 05300477 - 004

Subject Item: GP 002 Post-1969 Industrial Process Equipment Affected Units

Associated Items: EU 003 Coating Line C-3
EU 004 Coating Line C-6
EU 005 Corona Treater for Coating Line C-3
EU 006 Corona Treater for Coating Line C-6
EU 007 Coating Line C-7
EU 008 Corona Treater #1 for Coating Line C-7
EU 009 Corona Treater #2 for Coating Line C-7
EU 010 Corona Treater #3 for Coating Line C-7

What to do	Why to do it
Requirements for GP 002 apply seperately to each Emission Unit (EU) listed in GP 002.	hdr
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)
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0710, subp. 1(B)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-9** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

Subject Item: EU 003 Coating Line C-3**Associated Items:** GP 001 40 CFR Section 63, Subp. JJJJ Affected Units

GP 002 Post-1969 Industrial Process Equipment Affected Units

SV 004 Coating Line C-3 Dryer

What to do	Why to do it
40 CFR pt. 60, subp. RR Requirements	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 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.	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 in this permit. This limit is on all solvent applied in the coating process input. This means all organic solvent contained in the coating formulations that are metered into the coating applicator from the formulation area.	40 CFR Section 60.440(b); Minn. R. 7011.2560
Monthly Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used at EU 003 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 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 in this permit; 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, subp. 4 and 5
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: $\text{VOC} = [(W1 \times M1) + (W2 \times M2) + (W3 \times M3) + \dots] / 2000$ where: M# = the total mass, in pounds, 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, subp. 4 and 5
40 CFR pt. 63, subp. JJJJ Requirements	hdr
Compliance Demonstration for Uncontrolled Unit (EU 003) The Permittee must determine the organic HAP applied on this web coating line using Equation 6 of Appendix A of this permit. The organic HAP emitted from an uncontrolled web coating line is equal to the organic HAP applied on that web coating line.	40 CFR Section 63.3370(n)(4); Minn. R. 7011.7385

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-10** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

Subject Item: EU 004 Coating Line C-6**Associated Items:** GP 001 40 CFR Section 63, Subp. JJJJ Affected Units

GP 002 Post-1969 Industrial Process Equipment Affected Units

SV 005 Coating Line C-6 Dryer

What to do	Why to do it
40 CFR pt. 60, subp. RR Requirements	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 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.	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 in this permit. This limit is on all solvent applied in the coating process input. This means all organic solvent contained in the coating formulations that are metered into the coating applicator from the formulation area.	40 CFR Section 60.440(b); Minn. R. 7011.2560
Monthly Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used at EU 004 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 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 in this permit; 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, subp. 4 and 5
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: $\text{VOC} = [(W1 \times M1) + (W2 \times M2) + (W3 \times M3) + \dots] / 2000$ where: M# = the total mass, in pounds, 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, subp. 4 and 5
40 CFR pt. 63, subp. JJJJ Requirements	hdr
Compliance Demonstration for Uncontrolled Units (EU 004) The Permittee must determine the organic HAP applied on these web coating lines using Equation 6 of Appendix A of this permit. The organic HAP emitted from an uncontrolled web coating line is equal to the organic HAP applied on that web coating line.	40 CFR Section 63.3370(n)(4); Minn. R. 7011.7385

TABLE A: LIMITS AND OTHER REQUIREMENTS

A-11 07/17/12

Facility Name: Ritrama Inc
 Permit Number: 05300477 - 004

Subject Item: EU 007 Coating Line C-7

Associated Items: CE 009 Regenerative Thermal Oxidizer
 GP 001 40 CFR Section 63, Subp. JJJJ Affected Units
 GP 002 Post-1969 Industrial Process Equipment Affected Units
 SV 008 Coating Line C-7
 SV 012 Coating Line C-7, H2O Based Primer Dryer
 SV 013 Coating Line C-7, H2O Based Topcoat Dryer
 SV 014 Coating Line C-7, H2O Based Adhesive Dryer

What to do	Why to do it
EU 007 is an intermittently-controlled work station that uses water-based and solvent-based coatings. However, the fumes from the solvent-drying process are routed to a thermal oxidizer (CE 009) when solvent-based coatings are used. Regardless of when the unit is operating, under the solvent-based coating scenario the Permittee must operate the thermal oxidizer (CE 009).	hdr
EMISSION AND OPERATIONAL LIMITS	hdr
The Permittee subject to 40 CFR pt. 60, subp. RR shall: (1) Cause the discharge into the atmosphere from an affected facility not more than 0.20 kg VOC/kg of coating solids applied as calculated on a weighted average basis for one calendar month; or (2) Demonstrate for each affected facility; (i) A 90 percent overall VOC emission reduction as calculated over a calendar month; or (ii) the percent overall VOC emissions reduction specified in 40 CFR Section 60.443(b) as calculated over a calendar month.	40 CFR Section 60.442(a); Minn. R. 7011.2560
MONITORING AND RECORDKEEPING	hdr
Monitoring: If meeting the emission standard in 40 CFR Section 60.442(a)(1) or 60.442(a)(2)(ii), the Permittee shall calculate a weighted average of the mass of solvent used per mass of coating solids applied for a one calendar month period according to the following procedures: (1) Determine the weight fraction of organics and the weight fraction of solids of each coating applied by using Reference Method 24, by the coating manufacturer's formulation data. (2) Compute the weighted average (G) by the equation in 40 CFR Section 60.443(a)(2).	40 CFR Section 60.443(a); Minn. R. 7011.2560
To determine compliance with 40 CFR Section 60.442(a)(2), the Permittee shall calculate the required overall VOC emission reduction, Rq, according to the equation in 40 CFR Section 60.443(b). If Rq is less than or equal to 90 percent, then the required overall VOC emission reduction is Rq. If Rq is greater than 90 percent, then the required overall VOC emission reduction is 90 percent.	40 CFR Section 60.443(b); Minn. R. 7011.2560
Monitoring: The Permittee shall compare the monthly required overall VOC emission reduction specified in 40 CFR Section 60.443(b) to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR Section 60.442(a)(2). The monthly required overall VOC emission reduction must be less than or equal to the overall VOC reduction of the most recent performance test.	40 CFR Section 60.443(d); Minn. R. 7011.2560
Monthly Records: By the 15th day of each calendar month, the Permittee shall calculate and maintain a record of the VOC percentage reduction required for the previous calendar month for EU 007, and the actual VOC percentage reduction achieved for EU 007.	40 CFR Section 60.443(f); Minn. R. 7011.2560
Startups and shutdowns are normal operation for this affected facility. Emissions from these operations are to be included when determining if the standard specified at 40 CFR Section 60.442(a)(2) is being attained.	40 CFR Section 60.443(j); Minn. R. 7011.2560
Recordkeeping: The Permittee shall maintain a calendar month record of all coatings used and the results of the reference test method 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

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-12** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

<p>The Permittee shall maintain and retain records of the measurements required in 40 CFR Sections 60.443 and 60.445 for at least two years following the date of the measurements.</p> <p>Minn. R. 7007.0800, subp. 5(C) requires that all records be retained for an additional 3 years, for a total of 5 years from the date of generation.</p>	40 CFR Section 60.445(h); Minn. R. 7011.2560; Minn. R. 7007.0800, subp. 5(C)
<p>Recordkeeping: The Permittee shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR pt. 60 part recorded in a permanent form suitable for inspection. The file shall be retained for at least 2 years following the date of such measurements, maintenance, reports, and records.</p> <p>Minn. R. 7007.0800, subp. 5(C) requires that all records be retained for an additional 3 years, for a total of 5 years from the date of generation.</p>	40 CFR Section 60.7(f); Minn. R. 7019.0100, subp. 1; Minn. R. 7007.0800, subp. 5(C)
<p>At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the MPCA which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.</p>	40 CFR Section 60.11(d); Minn. R. 7017.2015, subp. 2(B)
<p>The Permittee shall not build, erect, install, or use any article, machine, equipment or process, the use of which conceals an emission which would otherwise constitute a violation of an applicable standard.</p>	40 CFR Section 60.12; Minn. R. 7011.0050
<p>All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests under 40 CFR Section 60.8. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device.</p>	40 CFR Section 60.13(b); Minn. R. 7017.1010, subp. 1(A)
<p>All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for location of continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR pt. 60 shall be used.</p>	40 CFR Section 60.13(f); Minn. R. 7017.1010, subp. 1(A)
<p>This emission unit is an affected facility under 40 CFR pt. 60 subp. RR and must meet the applicable permit requirements listed below.</p>	40 CFR Section 60.440(a) and (c); Minn. R. 7011.2560
<p>If VOC input exceeds 50 tons per 12-month period, EU 007 will become subject to the emission limit in 40 CFR Section 60.442(a) and all other requirements in 40 CFR pt. 60 subp RR.</p>	40 CFR Section 60.440(b) ; Minn. R. 7011.2560
<p>If VOC input exceeds 50 tons per 12 consecutive months, the Permittee shall demonstrate a 90 percent overall VOC emission reduction as calculated over a calendar month.</p>	40 CFR Section 60.442(a)(2) ; Minn. R. 7011.2560
<p>Where compliance with the emission limit specified in 40 CFR Section 60.442(a)(2) is achieved through the use of a solvent destruction device, the Permittee shall determine calendar monthly compliance by comparing the monthly required overall VOC emission reduction to the overall VOC emission reduction demonstrated in the most recent performance test which complied with 40 CFR Section 60.442(a)(2). If the monthly required overall VOC emission reduction is less than or equal to the overall VOC reduction of the most recent performance test, the affected facility is in compliance with 40 CFR Section 60.442(a)(2).</p>	40 CFR Section 60.443(d); 40 CFR Section 60.446(b) ; Minn. R. 7011.2560
<p>Where compliance with 40 CFR Section 60.442(a)(2) is achieved through the use of a solvent destruction device, the Permittee shall continuously record the destruction device combustion temperature during coating operations for thermal incineration destruction devices or the gas temperature upstream and downstream of the incinerator catalyst bed during coating operations for catalytic incineration destruction devices. For thermal incineration destruction devices the owner or operator shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 °C (50 °F) below the average temperature of the device during the most recent performance test complying with 40 CFR Section 60.442(a)(2).</p>	40 CFR Section 60.443(e); Minn. R. 7011.2560
<p>The Permittee shall maintain a calendar month record of all coatings used in EU 007, and the results of the reference test method specified in 40 CFR Section 60.446(a) or the manufacturer's formulation data used for determining VOC content of those coatings.</p>	40 CFR Section 60.445(a) ; Minn. R. 7011.2560

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-13** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

The Permittee shall keep, at the facility, a record of VOC use by weight for each calendar month. VOC use by weight shall be calculated by the 15th day of each month, for the previous month, using the method described in Appendix A.	40 CFR Section 60.445(a); 40 CFR Section 60.446(a) ; Minn. R. 7011.2560
The Permittee of EU 007 operating at the conditions specified in 40 CFR Section 60.440(b), shall maintain a 12-month record of the amount of solvent applied in the coating used in EU 007.	40 CFR Section 60.445(d) ; Minn. R. 7011.2560
The VOC content per unit of coating solids applied shall be determined by either Reference Method 24 and the equations specified in 40 CFR Section 60.443, or by manufacturer's formulation data. In the event of any inconsistency between a Method 24 test and manufacturer's formulation data, the Method 24 test will govern. The Administrator may require the Permittee to perform Method 24 tests during such months as he deems appropriate. For Reference Method 24, the coating sample must be a one liter sample taken into a one liter container at a point where the sample will be representative of the coating applied to the web substrate.	40 CFR Section 60.446(a) ; Minn. R. 7011.2560
40 CFR pt. 63, subp. JJJJ Requirements	hdr
Compliance Demonstration for Units Controlled by Thermal Oxidizer (EU 007) For each thermal oxidizer, the Permittee must: 1) Monitor the operating parameter in accordance with 40 CFR Section 63.3350(e) to ensure control device efficiency whenever a web coating line is operated; 2) For each capture system delivering emissions to that oxidizer, monitor the operating parameter established in accordance with 40 CFR Section 63.3350(f) to ensure capture efficiency whenever a web coating line is operated; 3) Determine the oxidizer destruction efficiency using the procedure in 40 CFR Section 63.3360(e); 4) Determine the capture system capture efficiency in accordance with 40 CFR Section 63.3360(f); 5) Determine the organic HAP content of each coating material as-applied during the month following the procedures detailed earlier in this permit; 6) Determine the sum of the mass of all coating materials as-applied while operating in bypass mode (i.e., uncontrolled);	40 CFR Section 63.3370(n)(3); Minn. R. 7011.7385
(cont) 7) Determine the sum of the mass of all coating materials as-applied while operating in control mode; and 8) Calculate the organic HAP emitted during the month using Equation 15 in Appendix A.	40 CFR Section 63.3370(n)(3); Minn. R. 7011.7385 (cont)

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-14** 07/17/12

Facility Name: Ritrama Inc
 Permit Number: 05300477 - 004

Subject Item: CE 009 Regenerative Thermal Oxidizer
Associated Items: EU 007 Coating Line C-7
 MR 001 RTO Temperature Strip Chart Monitor
 MR 002 RTO Temperature Electronic Monitor

What to do	Why to do it
EMISSION AND OPERATIONAL LIMITS	hdr
Regenerative Thermal Oxidizer (CE 009): The Permittee is required to operate this control equipment only when the solvent based coatings are in process. The requirement to operate this control equipment when the corresponding process equipment is operating does not apply when the water based coatings are processed by EU 007.	Minn. R. 7007.0800, subp. 2
Operation of Control Equipment Monitoring Equipment: The Permittee shall operate the control equipment monitoring equipment at all times the control equipment is required to operate.	Minn. R. 7007.0800, subps. 2 and 4
<p>Volatile Organic Compounds: greater than or equal to 95 percent control efficiency as calculated over a calendar month for each affected facility.</p> <p>This limit is more stringent than, and therefore satisfies the requirements of 40 CFR Section 60.442(a)(2)(i).</p> <p>(40 CFR Section 60.442(a)(2)(i) requires 90 percent overall VOC emission reduction)</p>	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 60.442(a)(2)(i); Minn. R. 7011.2560
Operate and maintain control equipment to achieve a control efficiency, as calculated over a calendar month, for HAPs - Volatile: greater than or equal to 98 percent control efficiency	Title I Condition: To avoid major source classification under 40 CFR Section 63.2; 40 CFR Sections 63.40-63.44; Minn. R. 7007.3010
Operation and Maintenance: The Permittee shall operate and maintain CE 009 according to the control equipment manufacturer's specifications and the facility operation and maintenance plan.	Minn. R. 7007.0800, subp. 2
Temperature: greater than or equal to 1574 degrees F using 3-hour Rolling Average at the combustion chamber outlet (Minimum Temperature Limit) as determined during the 10/04/2010 performance test, unless a new limit is set pursuant to Minn. R. 7017.2025, subp. 3. If a new minimum is required to be set it will be based on the values recorded during the most recent MPCA-approved performance test where compliance was demonstrated. the new limit shall be implemented upon receipt of the Notice of Compliance letter granting preliminary approval. The limit is final upon issuance of a permit amendment incorporating the change. If the recorded 3-hour rolling average temperature is below the Minimum Temperature Limit, the VOC used during that time shall be considered uncontrolled until the average temperature is above the Minimum Temperature Limit. This shall be reported as a deviation.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Table 1 (item 1.a) of 40 CFR pt. 63, subp. JJJJ; 40 CFR Section 63.3321(a); Minn. R. 7011.7385; Minn. R. 7007.0800, subps. 2 and 14; Also meets CAM requirements per 40 CFR Section 64
MONITORING AND RECORDKEEPING	hdr
<p>Temperature Monitoring: The Permittee shall maintain and operate a thermocouple monitoring device that continuously indicates and records the combustion chamber temperature of the thermal oxidizer. The monitoring device shall have an accuracy of +/- 0.75 percent of the temperature being measured or +/- 2.5 degrees Celsius, whichever is greater. The recording device shall also calculate the three-hour rolling average combustion chamber temperature. The monitor shall be operated at all times when CE 009 is operating.</p> <p>This requirement is more stringent than, and therefore meets the requirements of, 40 CFR Section 63.3350(e)(9)(ii).</p>	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; 40 CFR Section 63.3350(e)(9)(ii); 40 CFR Sections 60.443(e) and 60.445(e); Minn R. 7011.7385; Minn. R. 7011.2560; Minn. R. 7007.0800, subp. 4; Also meets CAM requirements per 40 CFR Section 64
Daily Monitoring: The Permittee shall physically verify the operation of the temperature recording device at least once each operating day to verify that it is working and recording properly. The Permittee shall maintain a written record of the daily verifications.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14; 40 CFR Section 64.3(b); Minn. R. 7017.0200
Monitoring Equipment: The Permittee shall install and maintain thermocouples to conduct temperature monitoring required by this permit. The monitoring equipment must be installed, in use, and properly maintained whenever operation of the monitored control equipment is required.	40 CFR Section 64.7(b); Minn. R. 7017.0200
Temperature Recordkeeping: The Permittee shall record and maintain all CE 009 temperature records at the facility. The records shall be composed of a continuous hard copy readout (also includes data saved in electronic format) or manual readings taken at least every 15 minutes.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 5; Also meets CAM requirements per 40 CFR Section 64

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-15** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

Annual Calibration: The Permittee shall calibrate the temperature monitor at least once every 12 months and shall maintain a written record of the calibration and any action resulting from the calibration.	40 CFR Section 64.3; Minn. R. 7017.0200
Quarterly Inspections: At least once per calendar quarter, the Permittee shall inspect the control equipment internal and external system components, including but not limited to the refractory, heat exchanger, and electrical systems. The Permittee shall maintain a written record of the inspection and any corrective actions taken resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
Annual Inspection: At least once per calendar year, the Permittee shall conduct an internal inspection of the control device that includes all operating systems of the control device. The Permittee shall maintain a written record of the inspection and any action resulting from the inspection.	40 CFR Section 64.3; Minn. R. 7017.0200
For periods when the thermal oxidizer is operated above the minimum combustion chamber temperature, the Permittee shall use either one of the following when completing calculations as required elsewhere in this permit: a. The overall control efficiency limit specified in this permit for this equipment (x%); or b. The overall control efficiency determined during the most recent MPCA approved performance test. If the tested efficiency is less than the efficiency limit in this permit, the Permittee must use the tested value in all calculations until the efficiency is demonstrated to be above the permit limit through a new test.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subps. 2 and 14;
Corrective Action: If the CE 009 combustion temperature falls below 1574 F (using 3-hour Rolling Average), during actual coating operations, unless a new minimum is set pursuant to Minn. R. 7017.0205, subp. 3, the Permittee shall take corrective action as soon as possible according to the control equipment manufacturer's specifications and the facility operation and maintenance plan. The Permittee shall keep a log of all corrective actions taken with records entered upon completion of each corrective action.	Title I Condition: To avoid major source classification under 40 CFR Section 52.21 and Minn. R. 7007.3000; Minn. R. 7007.0800, subp. 2; Also meets CAM requirements per 40 CFR Section 64
Documentation of Need for Improved Monitoring: If the Permittee fails to achieve compliance with an emission limitation or standard for which the monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing minimum combustion chamber temperature(s), the Permittee shall promptly notify the MPCA and, if necessary, submit a permit amendment application to address the necessary monitoring changes.	40 CFR Section 64.7(e); Minn. R. 7017.0200
As required by 40 CFR Section 64.9(a)(2), for the Semi-Annual Deviations Report listed in Table B of this permit and/or the Notification of Deviations Endangering Human Health and the Environment listed earlier in Table A of this permit, as applicable, the Permittee shall include the following related to the monitoring identified as required by 40 CFR pt. 64: 1) Summary information on the number, duration, and cause of excursions or exceedances, as applicable, and the corrective action taken; and 2) Summary information on the number, duration, and cause for monitor downtime incidents.	40 CFR Section 64.9(a)(2); Minn. R. 7017.0200
The Permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, and other supporting information required to be maintained. The Permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.	40 CFR Section 64.9(b); Minn. R. 7017.0200
Operation, Breakdowns, and Emergency Maintenance: The Permittee shall vent the emission unit listed in the Associated items under CE 009, to CE 009 at all times except during CE 009 breakdown or emergency maintenance. Emergency maintenance is defined as maintenance that must be conducted as soon as possible to avoid imminent damage to process or control equipment. The Permittee shall keep a log of the start and stop times for all periods of CE 009 downtime that occur when the emission unit EU 007 is operating. The log shall also specify the cause of the CE 009 downtime.	Minn. R. 7007.0800, subp. 2
The Permittee shall install, calibrate, maintain, and operate temperature monitoring equipment according to the manufacturer's specifications. The calibration of the chart recorder, data logger, or temperature indicator must be verified every 3 months or the chart recorder, data logger, or temperature indicator must be replaced. The Permittee must replace the equipment if you choose not to perform the calibration or if the equipment cannot be calibrated properly. The temperature monitoring equipment is considered a Continuous Parameter Monitoring System (CPMS).	40 CFR Section 63.3350(e)(9)(i); Minn. R. 7011.7385; Also meets CAM requirements per 40 CFR Section 64
The Permittee must install, operate, and maintain each CPMS according to the requirements in 40 CFR Section 63.3350(e)(1) through (7).	40 CFR Section 63.3350(e); Minn. R. 7011.7385; Also meets CAM requirements per 40 CFR Section 64

TABLE A: LIMITS AND OTHER REQUIREMENTS**A-16** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

Any averaging period for which the Permittee does not have valid monitoring data and such data are required constitutes a deviation and the Permittee must submit a notification in accordance with 40 CFR Section 63.3400(c).	40 CFR Section 63.3350(e)(8); Minn. R. 7011.7385; Also meets CAM requirements per 40 CFR Section 64
<p>The Permittee must develop a site-specific monitoring plan containing the information specified in 40 CFR Section 63.3350(f)(1) and (2) for each capture system.</p> <p>In addition, the Permittee must:</p> <ul style="list-style-type: none"> - conduct all capture system monitoring in accordance with the plan; - make the monitoring plan available for inspection by the permitting authority upon request; and - view and update the capture system monitoring plan at least annually. <p>Any deviation from the operating parameter value or range of values which are monitored according to the plan will be considered a deviation from the operating limit.</p>	40 CFR Section 63.3350(f); Minn. R. 7011.7385; Also meets CAM requirements per 40 CFR Section 64
Case by Case Determination per Section 112(g)(2)(B) of the Clean Air Act	hdr
RTO Temperature Recordkeeping: The Permittee shall continuously record the RTO Combustion Chamber temperature during coating operations. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the Combustion Chamber is more than 50 degrees F below the average temperature of the Combustion Chamber during the most recent performance test complying with 40 CFR 60.442(a)(2). The Permittee shall record each such occurrence and it's duration.	40 CFR 60.443(e); 40 CFR Sections 63.40-63.44; Minn. R. 7011.2560; Minn. R. 7007.0800, subp. 5; Minn. R. 7007.3010; Also meets CAM requirements per 40 CFR Section 64
PERFORMANCE TESTING	hdr
<p>Performance Test: due before end of each calendar 60 months starting 10/04/2010 to measure Total Hydrocarbons (Total VOC) Control Efficiency for CE 009.</p> <p>For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility."</p>	Title I Condition: To avoid major source classification under 40 CFR Sections 52.21 and 63.2; Minn. R 7007.3000;Minn. R. 7017.2020, subp. 1
<p>Performance Test: due before end of each calendar 60 months starting 10/04/2010 to measure Hazardous Air Pollutants - Volatile (HAPs - Volatile) Control Efficiency for CE 009.</p> <p>For additional applicable performance test requirements see 'General Performance Test Requirements' in Table A, Subject Item "Total Facility."</p>	Title I Condition: To avoid major source classification under CFR Sections 52.21 and 63.2; Minn. R 7007.3000;Minn. R. 7017.2020, subp. 1

TABLE B: SUBMITTALS

B-1 07/17/12

Facility Name: Ritrama Inc
Permit Number: 05300477 - 004

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.

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

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

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

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.

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

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

Send any application for a permit or permit amendment to:

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

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: Ritrama Inc
Permit Number: 05300477 - 004

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS**B-3** 07/17/12

Facility Name: Ritrama Inc

Permit Number: 05300477 - 004

What to send	When to send	Portion of Facility Affected
Compliance Status Report	due 31 days after end of each calendar half-year starting 12/05/2005. The report shall contain the information specified in Table A of this permit, under GP 001.	GP001
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
Report	due 30 days after end of each calendar year starting 01/01/2011. The Permittee shall submit reports semiannually when the CE 009 temperature drops as defined under 40 CFR Section 63.443(e). If no such periods occur, the Permittee shall state this in the report. The report shall be submitted with the Semiannual Deviations Report listed in Table B of this permit.	EU007

APPENDIX A
Facility Name: Ritrama, Inc.
Permit Number: 05300477-004

VOC Calculations

All equation numbers correspond to the equation numbers used in 40 CFR pt. 60, subp. RR.

- 1) VOC use by weight shall be calculated by the 15th day of each month, for the previous month, using the following method:

$$VOC = \sum_{i=1}^n W_{oi}M_{ci}$$

Where:

W_{oi} = The weight fraction of volatile organics of each coating (i) applied during the calendar month.

M_{ci} = The total mass of each coating (i) applied during the calendar month.

The value of W_{oi} will be obtained from either a U.S. EPA Reference Method 24 test or manufacturer's formulation data.

- 2) If the amount of VOC input exceeds 45 Mg per 12 consecutive months, the Permittee shall comply with the VOC emission limit contained in 40 CFR § 60.442(a)(1), and calculate G (the weighted average of the mass of solvent used per mass of coating solids applied), using the following equation, by the 15th day of each month for the previous 12 months

$$G = \frac{\sum_{i=1}^n W_{oi}M_{ci}}{\sum_{i=1}^n W_{si}M_{ci}}$$

Where:

W_{oi} = The weight fraction of volatile organics of each coating (i) applied during the calendar month.

W_{si} = The weight fraction of solids of each coating (i) applied during the calendar month.

M_{ci} = The total mass of each coating (i) applied during the calendar month.

The value of W_{oi} will be obtained from either an EPA Reference Method 24 test or manufacturer's formulation data.

APPENDIX A
Facility Name: Ritrama, Inc.
Permit Number: 05300477-004

HAP Calculations

All equation numbers correspond to the equation numbers used in 40 CFR pt. 63, subp. JJJJ.

Equation 1a: as-applied organic HAP content of each coating material

$$C_{ahi} = \frac{C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij}}{M_i + \sum_{j=1}^q M_{ij}}$$

Where:

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i, expressed as a mass fraction, kg/kg.

C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = number of different materials added to the coating material.

C_{hij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

Equation 6: total monthly organic HAP applied

$$H_m = \sum_{i=1}^p C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij} - M_{vret}$$

Where:

H_m = Total monthly organic HAP applied, kg.

p = Number of different coating materials applied in a month.

C_{hi} = Organic HAP content of coating material, i, as-purchased, expressed as a mass fraction, kg/kg.

M_i = Mass of as-purchased coating material, i, applied in a month, kg.

q = Number of different materials added to the coating material.

APPENDIX A
Facility Name: Ritrama, Inc.
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C_{hij} = Organic HAP content of material, j, added to as-purchased coating material, i, expressed as a mass fraction, kg/kg.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in 40 CFR § 63.3370.

Equation 10: organic HAP emission rate based on coating materials applied during the month

$$S = \frac{H_e}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_{ij}}$$

Where:

S = Mass organic HAP emitted per mass of material applied, kg/kg.

H_e = Total monthly organic HAP emitted, kg.

p = Number of different coating materials applied in a month.

M_i = Mass of as-purchased coating material, i, applied in a month.

q = Number of different materials added to the coating material.

M_{ij} = Mass of material, j, added to as-purchased coating material, i, in a month, kg.

Equation 15: organic HAP emitted during the month (using performance test data)

$$H_e = \left[\sum_{i=1}^p M_{Ci} C_{ahi} \right] \left[1 - \frac{R}{100} \right] + \left[\sum_{i=1}^p M_{Bi} C_{ahi} \right] - M_{vret}$$

Where:

H_e = Total monthly organic HAP emitted, kg.

p = Number of different coating materials applied in a month.

APPENDIX A

Facility Name: Ritrama, Inc.

Permit Number: 05300477-004

M_{ci} = Sum of the mass of coating material, i , as-applied on intermittently-controlled work stations operating in controlled mode and the mass of coating material, i , as-applied on always-controlled work stations, in a month, kg.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.

R = Overall organic HAP control efficiency, percent.

M_{bi} = Sum of the mass of coating material, i , as-applied on intermittently-controlled work stations operating in bypass mode and the mass of coating material, i , as-applied on never-controlled work stations, in a month, kg.

C_{ahi} = Monthly average, as-applied, organic HAP content of coating material, i , expressed as a mass fraction, kg/kg.

M_{vret} = Mass of volatile matter retained in the coated web after curing or drying, or otherwise not emitted to the atmosphere, kg. The value of this term will be zero in all cases except where you choose to take into account the volatile matter retained in the coated web or otherwise not emitted to the atmosphere for the compliance demonstration procedures in this section.

APPENDIX B
Facility Name: Ritrama, Inc.
Permit Number: 05300477-004

Insignificant Activities:

- Eleven indirect heating units, fueled by natural gas and propane, with the following maximum heat inputs; one with 74,000 Btu/hr, three with 115,000 Btu/hr, one with 120,000 Btu/hr, two with 135,000 Btu/hr, one with 224,000 Btu/hr, two with 300,000 Btu/hr, and one with 360,000 Btu/hr. Each unit is subject to Minnesota Performance Standards for Indirect Heating Equipment.
- One space heater with a maximum heat input of 201,000 Btu/hr. Subject to Minnesota Performance Standards for Indirect Heating Equipment.
- A Parts Washer utilizing 140 Petroleum Naptha. Subject to Minnesota Performance Standards for Industrial Process Equipment.
- One indirect heating, fueled by natural gas and propane, with a maximum heat input of 2.376 MMBtu/hr. Subject to Minnesota Performance Standards for Industrial Process Equipment.

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

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
3(G)	Emissions from a laboratory, as defined in the subpart. <i>Ritrama, Inc. has emissions from a laboratory hood.</i>	Minn. R. 7011.0710/0715
3(H)(3)	Brazing, soldering or welding equipment; <i>Ritrama, Inc. uses miscellaneous welding equipment.</i>	Minn. R. 7011.0710/0715
3(I)	Individual emissions units at a stationary source, each of which have a potential to emit the following pollutants in amounts less than: 1. 4,000 lbs/year of CO; 2. 2,000 lbs/year each of NO _x , SO ₂ , PM, PM ₁₀ , PM _{2.5} , VOC, and ozone ; and 3. 1,000 tons/year of CO ₂ e <i>Ritrama, Inc. has individual emission units (space heaters, indirect heating units, etc) fueled by natural gas and propane with a maximum heat input ranging from 74,000 to 360,000 Btu/hr. Each individual emission unit has the potential to emit less than the above constraints. The Parts Washer has the potential to emit less than 2,000 lbs/year VOC (including HAP-containing VOC).</i>	Minn. R. 7011.0510/.0515 + Minn. R. 7011.0710/0715
3(K)	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	Minn. R. 7011.0710/0715

APPENDIX B
Facility Name: Ritrama, Inc.
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Minn. R. 7007.1300, subpart	Rule Description of the Activity	Applicable Requirement
	spray painting of buildings, machinery, vehicles, and other supporting equipment.	
4	<p>Individual emissions units at a stationary source, each of which has:</p> <p>A. Potential emissions of 5.7 pounds per hour or actual emissions of two tons per year of carbon monoxide;</p> <p>B. Potential emissions of 2.28 pounds per hour or actual emissions of one ton per year for particulate matter, particulate matter less than ten microns, nitrogen oxide, sulfur dioxide, and VOCs;</p> <p>C. For hazardous air pollutants, emissions units with: (1) potential emissions of 25 percent or less of the hazardous air pollutant thresholds listed in subp. 5; or (2) combined HAP actual emissions of one ton per year unless the emissions unit emits one or more of the HAPs listed in this subpart; AND</p> <p>D. Potential emissions up to 10,000 tons per year or actual emissions up to 1,000 tons per year of CO₂e.</p> <p><i>Ritrama, Inc. has an individual emission unit (indirect heating unit) fueled by natural gas and propane with a maximum heat input of 2.4 MMBtu/hr. This individual emission unit has the potential to emit less than: 5.7 lbs/hr CO; 2.28 lbs/hr NO_x, SO_x, PM, PM₁₀, and VOC; 25% of the HAPs thresholds listed in Minn. R. 7007.1300, subp. 5; and 10,000 tons/year CO₂e.</i></p>	Minn. R. 7011.0710/0715

APPENDIX C
Facility Name: Ritrama, Inc.
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Maximum Contents of Materials

All contents are “as used”. The tables in Appendix C 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.

Clean-Up Materials	Cleaning VOCs		Cleaning HAPs	
	<i>Maximum Amount Used (gal/hr)</i>	<i>Maximum VOC Content (lbs/gal)</i>	<i>Maximum Usage Rate (lbs/hr)</i>	<i>Maximum HAP Content (Toluene, wt%)</i>
Methyl Ethyl Ketone	0.28	6.76	-	-
Iso-Propanol	0.06	6.58	-	-
Waldorf Blend	0.01	7.02	0.09	15.00%

APPENDIX C
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EU 003	Maximum Application Rate (lbs/hr)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
	325	65	65
Pollutant / HAP Name	Maximum Material Content (wt%)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
VOC	3.03%	1.20%	9.78%
Formaldehyde	0.0600%	0.0962%	0.0769%
Methanol	0.0170%	0.0065%	0.0052%
Acetaldehyde	0.0500%	-	-
Dichloromethane	-	-	-
Acrylic Acid	0.0139%	-	-
Methyl Methacrylate	0.0273%	-	-
Ethyl Benzene	0.0009%	-	-
Styrene	0.0170%	0.0065%	0.0028%
Methylene Diphenyl Diisocyanate	-	-	-
Ethylene Glycol	0.0998%	-	-
Vinyl Acetate	0.3222%	-	-
Toluene	-	-	-
Chlorobenzene	-	-	-
Hexane	-	-	-
Triethylamine	-	1.2000%	0.8150%
1,4-Dioxane	0.0030%	-	-
Ethyl Acrylate	-	-	-
2,4-Toluene Diisocyanate	-	-	-
Xylene	0.0004%	-	-
Glycol Ethers	0.0875%	-	-

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EU 004	Maximum Application Rate (lbs/hr)
	<i>Adhesive</i>
	975
Pollutant / HAP Name	Maximum Material Content (wt%)
	<i>Adhesive</i>
VOC	3.03%
Formaldehyde	0.0600%
Methanol	0.0170%
Acetaldehyde	0.0500%
Dichloromethane	-
Acrylic Acid	0.0139%
Methyl Methacrylate	0.0273%
Ethyl Benzene	0.0009%
Styrene	0.0170%
Methylene Diphenyl Diisocyanate	-
Ethylene Glycol	0.0998%
Vinyl Acetate	0.3222%
Toluene	-
Chlorobenzene	-
Hexane	-
Triethylamine	-
1,4-Dioxane	0.0030%
Ethyl Acrylate	-
2,4-Toluene Diisocyanate	-
Xylene	0.0004%
Glycol Ethers	0.0875%

APPENDIX C
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EU 007 Solvent Based	Maximum Application Rate (lbs/hr)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
	1000	195	195
Pollutant / HAP Name	Maximum Material Content (wt%)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
VOC	69.71%	90.00%	94.86%
Formaldehyde	0.1000%	0.0275%	-
Methanol	3.6000%	0.0019%	-
Acetaldehyde	-	-	-
Dichloromethane	-	-	7.9200%
Acrylic Acid	-	-	-
Methyl Methacrylate	-	-	-
Ethyl Benzene	1.0300%	-	-
Styrene	-	-	-
Methylene Diphenyl Diisocyanate	-	-	0.1170%
Ethylene Glycol	-	-	-
Vinyl Acetate	4.8000%	-	-
Toluene	36.3600%	-	34.3200%
Chlorobenzene	0.0125%	-	-
Hexane	15.1300%	-	-
Triethylamine	-	0.2914%	-
1,4-Dioxane	-	-	-
Ethyl Acrylate	0.2343%	-	-
2,4-Toluene Diisocyanate	-	-	0.0020%
Xylene	4.7600%	-	-
Glycol Ethers	-	-	-

APPENDIX C
Facility Name: Ritrama, Inc.
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EU 007 Water Based	Maximum Application Rate (lbs/hr)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
	1000	195	195
Pollutant / HAP Name	Maximum Material Content (wt%)		
	<i>Adhesive</i>	<i>Primer</i>	<i>Topcoat</i>
VOC	3.03%	1.20%	9.78%
Formaldehyde	0.0600%	0.0962%	0.0769%
Methanol	0.0170%	0.0065%	0.0052%
Acetaldehyde	0.0500%	-	-
Dichloromethane	-	-	-
Acrylic Acid	0.0139%	-	-
Methyl Methacrylate	0.0273%	-	-
Ethyl Benzene	0.0009%	-	-
Styrene	0.0170%	0.0065%	0.0028%
Methylene Diphenyl Diisocyanate	-	-	-
Ethylene Glycol	0.0998%	-	-
Vinyl Acetate	0.3222%	-	-
Toluene	-	-	-
Chlorobenzene	-	-	-
Hexane	-	-	-
Triethylamine	-	1.2000%	0.8150%
1,4-Dioxane	0.0030%	-	-
Ethyl Acrylate	-	-	-
2,4-Toluene Diisocyanate	-	-	-
Xylene	0.0004%	-	-
Glycol Ethers	0.0875%	-	-

APPENDIX D
Facility Name: Ritrama, Inc.
Permit Number: 05300477-004

Monthly Recordkeeping – VOC and HAP Emissions

The equations used to demonstrate compliance with GP 001 limits have been modified to include a constant term that is representative of emissions from the combustion units EU 003, EU 004, and EU 007 operating continuously for 8760 hours per year. The equations are structured to calculate the pollutant emissions on monthly basis; as such, the constant term also reflects emissions from the combustion units on a monthly basis. The constants for equations calculating monthly VOC and HAP emissions can be found in the table below.

Constants Used for Monthly Calculations of VOC and HAP Emissions	
<i>Pollutant</i>	<i>Constant (tons/month)</i>
VOC	5.74E-02
Arsenic	2.09E-06
Benzene	2.19E-05
Beryllium	1.25E-07
Cadmium	1.15E-05
Chromium	1.46E-05
Cobalt	8.76E-07
Dichlorobenzene	1.25E-05
Formaldehyde	7.82E-04
Lead	5.21E-06
Manganese	3.96E-06
Mercury	2.71E-06
N-Hexane	1.88E-02
Naphthalene	6.36E-06
Nickel	2.19E-05
Polycyclic Organic Matter	9.20E-07
Selenium	2.50E-07
Toluene	3.55E-05
Total HAP	1.97E-02