

**DRAFT/PROPOSED**

**AIR EMISSION PERMIT NO. 14100038- 007**  
**Total Facility Operating Permit - Reissuance**

**IS ISSUED TO**

Plymouth Foam Inc

**PLYMOUTH FOAM INC**  
13900 Industry Avenue  
Becker, Sherburne County, MN 55308

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.14100038-005 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:** Federal; Part 70/Limits to Avoid NSR

**Operating Permit Issue Date:** <issue date>

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

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

for John Linc Stine  
Commissioner  
Minnesota Pollution Control Agency

**Permit Applications Table**

<b>Permit Type</b>	<b>Application Date</b>	<b>Permit Action</b>
Total Facility Operating Permit Reissuance	03/16/12; 9/04/12 supplemental application material received	007

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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:**

Plymouth Foam manufactures expanded polystyrene foam, producing insulation, packaging, and flotation products for dock systems. The process involves expanding polystyrene beads with steam, aging the expanded beads, and molding the beads with steam. The foam used for insulation is cut into boards with hot wires. During pre-expansion, aging of expanded beads and final product, and molding, pentane (most of the VOC emissions) and styrene monomer, Volatile Organic Compounds (VOCs), are emitted. Steam is currently provided by two natural gas boilers used for heating and EPS bead molding.

**TABLE A: LIMITS AND OTHER REQUIREMENTS**

A-1 10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

**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**

<b>What to do</b>	<b>Why to do it</b>
<b>CONSTRUCTION AUTHORIZATION</b>	hdr
The Permittee is authorized to install two new emission units as authorized in the previous reissuance, EU 013 and EU 014. Both units shall meet the requirements of this permit (e.g. listed at GP 001, GP 005, EU 013, EU 014, etc.) and shall be limited in size to those specified in the permit application submitted for this permit.  The construction authorization expires 18 months after permit issuance. The Permittee must keep a record of the dates of installation and start-up on site. The Permittee may apply for an extension of the construction authorization deadline by following the Administrative Amendment provisions in Minn. R. 7007.1400.	Minn. R. 7007.0800, subp. 2
<b>SOURCE-SPECIFIC REQUIREMENTS</b>	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
Equipment Labeling: The Permittee shall permanently affix a unique number to each emissions unit for tracking purposes. The numbers shall correlate the unit to the appropriate EU and GP numbers used in this permit. The number can be affixed by placard, stencil, or other means. The number shall be maintained so that it is readable and visible at all times from a safe distance. If equipment is added, it shall be given a new unique number; numbers from replaced or removed equipment shall not be reused.	Minn. R. 7007.0800, subp. 2
Equipment Inventory: The Permittee shall maintain a written list of all emissions units and control equipment on site. The Permittee shall update the list to include any replaced, modified, or new equipment prior to making the pre-authorized change.  The list shall correlate the units to the numbers used in this permit (EU and GP) and shall include the data on Forms GI-04, GI-05B, and GI-05C. The date of construction shall be the date the change was made for replaced, modified, or new equipment.	Minn. R. 7007.0800, subp. 2
This permit establishes limits on the facility to keep it a minor source under New Source Review. The Permittee cannot make any change at the source that would make the source a major source under New Source Review until a permit amendment has been issued. This includes changes that might otherwise qualify as insignificant modifications and minor or moderate amendments.	Title I Condition: To avoid classification as major source or modification under 40 CFR Section 52.21; To avoid major source classification under 40 CFR Section 70.2, Minn. R. 7007.0200
<b>OPERATIONAL REQUIREMENTS</b>	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, subps. 7A, 7L & 7M; 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. Note: At the time of issuance of this permit, this Facility has no air pollution control equipment nor is any required by the permit.	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)

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

10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

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
<b>MONITORING REQUIREMENTS</b>	hdr
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).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A, B, and/or C, monitoring a process or control equipment connected to that process is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
<b>RECORDKEEPING</b>	hdr
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007.1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350, subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007.0800, subp. 5(B)
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.	Minn. R. 7007.1200, subp. 4
<b>REPORTING/SUBMITTALS</b>	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3.  At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3

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

10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2.  At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500
Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. This shall be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095

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

10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

**Subject Item: GP 001 Expanded Foam Processes**

**Associated Items:**

- EU 006 Pre-puff storage bags
- EU 007 Product cutting and storage area
- EU 008 Shape mold machine
- EU 009 Shape mold machine
- EU 013 Shape Mold Machine
- EU 015 Shape Mold Machine
- EU 016 Shape Mold Machine
- EU 017 Shape Mold Machine
- EU 018 Shape Mold Machine
- EU 019 Shape Mold Machine
- EU 020 Shape Mold Machine
- EU 021 Shape Mold Machine
- EU 022 Shape Mold Machine
- EU 023 Shape Mold Machine
- EU 024 Shape Mold Machine
- EU 025 EPS bead pre-expander

What to do	Why to do it
<b>EMISSION AND OPERATIONAL LIMITS</b>	hdr
<p>The Permittee may replace or move listed emission units in GP 001, provided VOC and HAP emissions are tracked and calculated directly from material usage. All changes must meet the requirements of GP 001.</p> <p>If a proposed change triggers an applicable requirement that is not contained in this permit, the change must go through the appropriate procedure in Minn. R. ch. 7007.</p>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR section 52.21 and Minn. R. 7007.3000; and to avoid major source classification under 40 CFR section 70.2, Minn. R. 7007.0200</p>
<p>Volatile Organic Compounds: less than or equal to 240 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.</p> <p>All emission units or stacks added to GP 001 as allowed in this permit shall be included in this calculation. VOC contents for each VOC-containing material shall be determined as described under the Material Content requirement in GP 001.</p>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 &amp; Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200</p>
<p>All VOC-emitting equipment at the Facility is subject to this limit. If the Permittee replaces any existing VOC-emitting equipment, adds new VOC-emitting equipment, or modifies the existing equipment, such equipment is subject to this permit limit 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 complete VOC calculations described in Minn. R. 7007.1200, subp. 2. 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>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR Section 52.21 &amp; Minn. R. 7007.3000; to avoid major source classification under 40 CFR Section 70.2 and Minn. R. 7007.0200</p>
<p>Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.</p>	<p>Minn. R. 7011.0715, subp. 1(A)</p>
<p>Opacity: less than or equal to 20 percent opacity</p>	<p>Minn. R. 7011.0715, subp. 1(B)</p>
<b>MONITORING AND RECORDKEEPING</b>	hdr
<p>Daily Recordkeeping: On each day of operation, the Permittee shall calculate, record, and maintain the pounds of each VOC-containing material used based on written usage records.</p>	<p>Title I Condition: To avoid classification as major source and modification under 40 CFR 52.21 and Minn. R. 7007.3000; to avoid major source classification under 40 CFR 70.2, Minn. R. 7007.0200, and 40 CFR 63.2; Minn. R. 7007.0800, subps. 4 and 5</p>



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

10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

<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"> <li>1) The total usage of VOC-containing materials for the previous calendar month using the daily usage records. This record shall also include the VOC and solids contents of each material as determined by the Material Content requirement of this permit;</li> <li>2) The VOC emissions for the previous month using the formulas specified in this permit; and</li> <li>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.</li> </ol>	Minn. R. 7007.0800, subp. 4 and 5
<p>Monthly Calculation -- VOC Emissions</p> <p>The Permittee shall calculate monthly VOC emissions using the following equation:</p> $\text{VOC (tons/month)} = (A1 \times V1) + (A2 \times V2) + (A3 \times V3) + \dots$ <p>where:</p> <p>A# = amount of each VOC-containing material used during the previous month, in tons</p> <p>V# = weight percent of VOC in A#, as a fraction</p> <p>The 12-month rolling sum shall be calculated by summing the monthly VOC emissions from the previous 12 months.</p>	Minn. R. 7007.0800, subp. 4 and 5
<p>VOC Content of EPS Bead: The Permittee shall use the Certificate of Analysis (COA) or Material Safety Data Sheet (MSDS) to determine the VOC content of each lot of EPS bead. If the COA or MSDS is not available or does not include the VOC content of a particular lot of EPS bead, then the Permittee shall assume that the pentane content is 6.8% by weight and/or the styrene monomer content is 0.1% by weight, as applicable. However, if in the preceding 12 months EPS bead with a pentane content of greater than 6.8% was used, then the Permittee shall assume that the pentane content is equivalent to the highest pentane content of bead used in the preceding 12 months; likewise, if in the preceding 12 months EPS bead with a styrene monomer content of greater than 0.1% was used, then the Permittee shall assume that the styrene monomer content is equivalent to the highest styrene monomer content of bead used in the preceding 12 months.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>(continued from above)</p> <p>Other alternative methods approved by the MPCA may be used to determine the VOC content of raw materials. The MPCA reserves the right to require the Permittee to take samples of VOC containing materials and to conduct analysis of VOC content as per EPA or ASTM reference methods. If the EPA or ASTM reference method is used, it shall supersede the COA or MSDS data.</p>	Minn. R. 7007.0800, subps. 4 and 5
<p>Material Content of Other Materials: VOC contents in non-EPS Bead materials shall be determined by the 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 permit calculations. Other alternative methods approved by the MPCA may be used to determine the VOC content. The Commissioner reserves the right to require the Permittee to determine the VOC content of any material, according to EPA or ASTM reference methods. If an EPA or ASTM reference method is used for material content determination, the data obtained shall supersede the MSDS.</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 2 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> <p>HAP emissions increase with lower pentane content in EPS beads. Assumptions used in HAP emissions are listed in Appendix 2. Changing to a material that has a lower pentane content that results in an increase of HAP 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

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

10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

**Subject Item:** GP 005 Indirect Heating Units**Associated Items:** EU 001 Boiler #1

EU 005 Boiler #2

EU 014 Boiler #3

What to do	Why to do it
OPERATIONAL REQUIREMENTS	hdr
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input . Potential emissions of each boiler based on equipment design = 0.007 lb/million Btu heat input.	Minn. R. 7011.0515, subp. 1
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity.	Minn. R. 7011.0515, subp. 2
Fuel Types: Natural gas or propane only, by design.	Minn. R. 7005.0100, subp. 35a
RECORDKEEPING	hdr
Fuel Records: The Permittee shall keep records of fuel purchases for the facility on a monthly basis.	Minn. R. 7007.0800, subp. 5

## TABLE B: SUBMITTALS

B-1 10/25/12

Facility Name: Plymouth Foam Inc  
Permit Number: 14100038 - 007

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.

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

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

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

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

**TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS****B-2** 10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

<b>What to send</b>	<b>When to send</b>	<b>Portion of Facility Affected</b>
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup. The Permittee shall submit a written notification for EU 013. The notice shall include the EU number, the date that construction began, and the date of initial startup.	EU013
Notification of the Actual Date of Initial Startup	due 15 days after Initial Startup. The Permittee shall submit a written notification for EU 014. The notice shall include the EU number, the date that construction began, and the date of initial start-up.	EU014

**TABLE B: RECURRENT SUBMITTALS****B-3** 10/25/12

Facility Name: Plymouth Foam Inc

Permit Number: 14100038 - 007

What to send	When to send	Portion of Facility Affected
Semiannual Deviations Report	due 30 days after end of each calendar half-year starting 05/02/2007 . The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Annual Report	due 31 days after end of each calendar year starting 05/02/2007. The Permittee shall submit an annual report by January 31st that describes the changes made at the facility during the previous calendar year using the latest MPCA application forms. The report shall include the emission unit, stack/vent, group, and control equipment data for any new or replaced units or control devices. The report shall document the VOC 12-month rolling sum calculations for the previous calendar year. The report shall be submitted with the annual Compliance Certification listed in Table B. As part of the Annual Report, the Permittee shall verify and certify that the facility has maintained minor source status for New Source Review.	Total Facility
Compliance Certification	due 31 days after end of each calendar year starting 05/02/2007 (for the previous calendar year). The Permittee shall submit this report 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 1: Insignificant Activities and Applicable Requirements**

Facility Name: Plymouth Foam Inc

Permit Number: 14100038-007

**Insignificant Activities and Applicable Requirements**

<b>Minn. R. 7007.1300, subpart</b>	<b>Rule Description of the Activity</b>	<b>Likely Applicable Requirement</b>
3(l)	<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"><li>1. 4,000 lbs/year of carbon monoxide;</li><li>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</li><li>3. 1,000 tons/year of CO<sub>2</sub>e</li></ol> <ul style="list-style-type: none"><li>• <i>Plymouth Foam has five 250,000 Btu/hr natural gas fired space heaters.</i></li><li>• <i>Plymouth foam has a hot glue adhesive process.</i></li></ul>	<p>Minn. R. 7011.0510/0515; Minn. R. 7011.0715</p>

## APPENDIX 2 — Maximum Contents of Materials

Facility Name: Plymouth Foam Inc

Permit Number: 14100038-007

The table below are the values used to describe the high and low VOC contents of the EPS bead that have been supplied by the manufacturer for use in determining potential and limited emissions based on the weight of EPS bead material processed. The minimum value of pentane and VOC is important as it results in the highest HAP (styrene) potential and limited emissions.

Emissions Unit	VOC Content <sup>1</sup> (% weight)		Pentane Content <sup>2</sup> (% weight)		Styrene Content <sup>3</sup> (% weight)
	Max <sup>4</sup>	Min <sup>5</sup>	Max <sup>4</sup>	Min <sup>5</sup>	Max <sup>4</sup> /Min <sup>5</sup>
EU 006	6.90	5.90	6.80	5.80	0.10
EU 007	6.90	5.90	6.80	5.80	0.10
EU 008	6.90	5.90	6.80	5.80	0.10
EU 009	6.90	5.90	6.80	5.80	0.10
EU 013	6.90	5.90	6.80	5.80	0.10
EU 015	6.90	5.90	6.80	5.80	0.10
EU 016	6.90	5.90	6.80	5.80	0.10
EU 017	6.90	5.90	6.80	5.80	0.10
EU 018	6.90	5.90	6.80	5.80	0.10
EU 019	6.90	5.90	6.80	5.80	0.10
EU 020	6.90	5.90	6.80	5.80	0.10
EU 021	6.90	5.90	6.80	5.80	0.10
EU 022	6.90	5.90	6.80	5.80	0.10
EU 023	6.90	5.90	6.80	5.80	0.10
EU 024	6.90	5.90	6.80	5.80	0.10
EU 025	6.90	5.90	6.80	5.80	0.10

1. The EPS beads contain two VOC's, pentane and styrene. The VOC content is calculated as a combination of the pentane and styrene content as a percent of EPS bead weight.
2. The pentane content as a percent of weight of the EPS bead has a range of 5.80% to 6.80% provided by material manufacturer to be used in calculations. If the pentane content of the EPS bead material is unknown, it is assumed to be 6.80% by weight or the highest known content of the past 12 months, whichever is higher.
3. If the styrene content is unknown, 0.10% or the highest known over the past 12 months should be used in this calculation.
4. Maximum contents used to determine the amount of material available to process based on VOC content.
5. Minimum contents used to determine the largest amount of EPS foam material that can be processed due to VOC limits, resulting in the highest styrene emissions.