

General information

Public comment period begins: October 20, 2020

Public comment period ends: November 19, 2020 (4:30 p.m.)

The Minnesota Pollution Control Agency (MPCA) Commissioner has made a preliminary determination to reissue this permit.

Name and address of Permittee:

FilmTec Corp
5400 Dewey Hill Rd
Edina, MN 55439-2085

Facility name and location:

FilmTec Corp - Dewey Hill
5400 Dewey Hill Rd
Edina, MN 55439-2085
Hennepin County
T116N, R21W, Section 008

MPCA contact person:

Hannah Braatz
Industrial Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194
Phone: 651-757-2365
Email: hannah.braatz@state.mn.us

File manager phone: 651-757-2728 or
1-844-828-0942

A draft permit is available for review on the MPCA Public Notices webpage at <http://www.pca.state.mn.us/publicnotices>. Additional materials relating to the issuance of this permit are available for inspection. Please call the listed MPCA contact person between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday to arrange for this. The MPCA will mail or email a copy of the draft permit upon request. Comments, petitions, and other requests must be received at the MPCA in writing on or before the public comment period end date and time identified above.

Description of FilmTec

FilmTec Corp began operation in 1977. The manufacturing facilities located in Edina, Minnesota manufactures products that supply a global market. FilmTec Corp manufactures thin film composite membranes that are based on reverse osmosis/nano-filtration technology. These membranes are used in industrial, municipal, commercial and home water treatment applications. These membranes are also used in specialized applications such as ultra pure water treatment for the manufacturer of semiconductors and in food and dairy production. FilmTec manufactures and fabricates these membranes into a variety of elements using advanced automated manufacturing.

The main pollutant of concern is Volatile Organic Compound (VOC) and hazardous air pollutants (HAP) from process lines. Some of these emissions are controlled by thermal oxidizers and activated carbon adsorption system. Smaller amounts of combustion pollutants are emitted from several boilers. The facility also has equipment that is considered insignificant under Minnesota Rules. In previous permit actions, the facility took limits on the emissions of VOC to avoid major source classification for New Source Review (40 CFR Section 52.21). The facility is a major source under the federal operation permits program (40 CFR pt. 70) and is an area source under the National Emissions Standards for Hazardous Air Pollutants (NESHAPs, 40 CFR pt. 63) due to HAP emission limits.

This permit action incorporates two rolled-in major amendment applications, one minor amendment application, and one administrative amendment application.

The 2016 major amendment application includes revisions to calculation methodology, inspection frequencies, and replacement frequencies. No construction or physical modification of the facility is included in the 2016 major amendment application. The EPA Consent Decree No. 19-cv-1985 was submitted as supplemental information to the 2016 major amendment application. Conditions from this consent decree are included in this permit action.

The 2020 minor amendment application is for the construction of a new emergency generator and associated stack.

The 2020 administrative amendment application is for an owner name change.

The 2020 major amendment application is for construction of a new production line (Line 700), a new boiler, and a new thermal oxidizer. Some of the new emission units were previously part of the now decommissioned Line 300.

The permit action is for construction and operation of the facility. The permit action is the reissuance of the Part 70 Operating Permit; therefore, the draft permit has been placed on public notice.

A summary of the Potential to Emit (PTE) in tons per year is as follows:

Pollutant	PM	PM ₁₀	PM _{2.5}	SO ₂	NO _x	VOCs	CO	CO _{2e}	All HAPs
Total Facility PTE	2.47	2.47	2.47	0.19	32.6	222.2	27.5	38,700	11.3

*Not reported in Minnesota emission inventory.

PM = Particulate Matter

PM_{2.5} = PM, 2.5 microns and smaller

NO_x = Nitrogen Oxides

CO = Carbon Monoxide

PM₁₀ = PM, 10 microns and smaller

SO₂ = Sulfur Dioxide

VOCs = Volatile Organic Compounds

CO_{2e} = Carbon Dioxide Equivalents as defined in Minn. R. 7007.0100

HAP = Hazardous Air Pollutant

The Permittee is not required to submit a pollution prevention progress report pursuant to Minn. Stat. § 115D.08.

The preliminary determination to reissue this Air permit is tentative.

Procedure for public participation

As stated in Minn. R. chs. 7000 and 7001, there are three formal procedures for public participation in the MPCA's consideration of this matter. Interested persons may:

- (1) Submit written comments on the draft permit.
- (2) Petition the MPCA to hold a public informational meeting.
- (3) Petition the MPCA to hold a contested case hearing.

Submitting written comments

To submit comments or petitions to the MPCA through the mail or email, you must state:

- (1) Your interest in the permit application or the draft permit.
- (2) The action you wish the MPCA to take, including specific references to the section of the draft permit you believe should be changed.
- (3) The reasons supporting your position, stated with sufficient specificity as to allow the MPCA to investigate the merits of the position.

Public informational meeting

A public informational meeting is an informal meeting during which interested persons can ask questions concerning the proposed facility. MPCA staff will be present to provide information. If an interested person would like the MPCA to hold a public informational meeting, the person should include all information identified above and in addition include a statement of the reasons the person desires the MPCA to hold a public informational meeting and the issues that the person would like the agency to address at the public informational meeting.

Contested Case Hearing

A contested case hearing is a formal proceeding before an administrative law judge empowered to advise the MPCA regarding issues of fact. As described in Minn. R. 7000.1800, persons who submit petitions for a contested case hearing must also state the issues they propose to address in a contested case hearing, the specific relief requested or resolution of the matter, and the reasons (which may be in the form of proposed findings) supporting an MPCA decision to hold a contested case hearing. Failure to comply with these rules exactly may result in a denial of the request. To the extent known, the petitioner may also submit a list of prospective witnesses to be called at a hearing, a proposed list of publications, references, or studies to be introduced at a hearing and the approximate time required for the petitioner to present the matter at a hearing. The decision whether to hold a contested case hearing will be made under Minn. R. 7000.1900.