INTERPLASTIC CORPORATION
Thermoset Resins Division

2015 NE Broadway St.
Minneapolis, Minnesota 55413-1775
(651) 481-6860 Fax (612) 331-4235

RECEIVED
JAN 31 2013
AIR ENFORCEMENT BRANCH
U.S. EPA REGION 5

January 29, 2013

Air Compliance Tracking Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North
Saint Paul, MN 55155-4194

RE: **July to December 2012 Semi-annual Deviation Reports DRF-1 and DRF-2**
2012 Annual Compliance Certification Report
Interplastic Corporation, 2015 NE Broadway St., Minneapolis, MN 55413
Air Emissions Permit No. 05300251-003 issued May 6, 2008

Dear Coordinator,

Please find enclosed the above referenced reports for the facility noted above. These reports are required by Federally Enforceable State; Limits to Avoid Part 70 and New Source Review Air Emissions Permit No. 05300251-003.

Please contact Sheri Peterson at (651) 757-3983 direct or (651) 481-6860, ext. 313 if you have any additional questions regarding the information provided.

INTERPLASTIC CORPORATION

Tracy Baysinger (SP)

By: Tracy Baysinger
Chief Environmental Officer
13SP005

Copy: 1) Larry Marczak, Plant Manager, Minneapolis Plant
2) Sheri Peterson, Site Manager-HSEQ, Minneapolis Plant
3) Mr. George Czerniak, Chief
Air Enforcement & Compliance Assurance Branch
EPA Region V
77 West Jackson Boulevard
Chicago, IL 60604

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

CR-04

Annual Compliance Certification Report
Air Quality Permit Program

Doc Type: Excess Emission Report

General Information about Deviation and Compliance Reporting

If your permit requires you to submit deviation reports or an annual compliance certification, you should use the *Deviation Reporting Forms* (DRFs) and Annual Compliance Certification Report (CR-04), unless you get Minnesota Pollution Control Agency (MPCA) approval to use another format or your facility's permit specifies otherwise. There are two separate DRF forms: DRF-1 and DRF-2.

DRF-1 is used to report direct excess stack emissions recorded by Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

DRF-2 is used to report deviations recorded by periodic monitoring systems, deviations of permitted operating conditions and surrogate parameters whether recorded periodically or continuously, or potential excess emissions identified through recordkeeping.

Some examples: flow rate, temperature, throughput, control equipment operating parameters, fuel-use records

CR-04: is used to report facility compliance status at the end of each year *if required by your permit.*

Submit one copy to both:

Air Compliance Tracking Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194
Or
E-mail a signed and scanned PDF copy to: AQRoutineReport.PCA@state.mn.us
(see e-mail instructions in "Routine Air Report Instructions Letter" at http://www.pca.state.mn.us/nwqh472)

Mr. George Czemiak, Chief
Air Enforcement & Compliance Assurance Branch
EPA Region V
77 West Jackson Boulevard
Chicago, IL 60604

General Facility Information

Facility name: Interplastic Corporation, Minneapolis, MN
County: Hennepin
This certification report covers the period of January 1 – December 31,

AQ file no.: 1176-A
AQ permit no.: 053000251-003
Year: 2012

Reports Submitted and Which Included of Deviations

Provide the following information regarding each report that was submitted to the Minnesota Pollution Control Agency (MPCA) and which included deviations. Use the same numbering system as used in the facility permit.

☐ Check here if no deviations have been reported. **Only list reports which included deviations below.**

Type of deviation report	Period covered by report	Date of cover letter accompany report (mm/dd/yyyy)
DRF-1	January to June 2012	7/25/2012
DRF-2	January to June 2012	7/25/2012
DRF-1	July to December 2012	1/29/2012
DRF-2	July to December 2012	1/29/2012

Certification

I certify under penalty of law that I have reviewed this facility's compliance status with respect to all permit conditions for the above specified calendar year. I have determined, to the best of my knowledge, that this facility has been in continuous compliance with all permit conditions with the exception of those requirements listed in the above deviations report(s) which have been submitted to the Air Quality Compliance Tracking Coordinator at the MPCA.

Responsible Official

Print name: Tracy Baysinger
Title: Chief Environmental Officer
Signature: Tracy Baysinger (SP)
Date: 1-29-13

Note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.

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

DRF-1

Excess Emissions Reporting Form
Air Quality Permit Program

Doc Type: Excess Emission Report

Instructions on Page 5

Note: Please complete, and remit **only** the forms. Please see the instructions to ensure proper use and understanding of definitions. **Do not print and return the instructions.**

General Information about Deviation and Compliance Reporting

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DRF-1 is used to report direct excess stack emissions (EE) recorded by Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

DRF-2 is used to report deviations recorded by periodic monitoring systems, deviations of permitted operating conditions and surrogate parameters whether recorded periodically or continuously, or potential excess emissions identified through recordkeeping.

Some examples: flow rate, temperature, throughput, control equipment operating parameters, fuel-use records

CR-04: is used to report facility compliance status at the end of each year *if required by your permit.*

Address hard copy report submittals to:
Air Compliance Tracking Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Or

E-mail a signed and scanned PDF copy to: AQRoutineReport.PCA@state.mn.us
(see e-mail instructions in "Routine Air Report Instructions Letter" at http://www.pca.state.mn.us/nwgh472)

1) General Facility Information

Facility name: Interplastic Corporation, Minneapolis, MN
County: Hennepin
Report covers quarter: July to December 2012

AQ file no.: 1176-A
AQ permit no.: 05300251-003
Year: 2012

2) CEMS/COMS Data Summary Table

				Duration of Monitor Downtime		Duration of Excess Emissions (EE)			
2a)	2b)	2c)	2d)	3i)	2e)	4l)	2f)	4m)	2g)
Monitor ID Number	Monitor ID Pollutant	EU/SV ID Number	Total Operating Time (TOT)	Total Duration of Monitor Downtime	**Downtime % of TOT**	Cumulative Duration of Exempt EE	**Exempt EE % of TOT**	Cumulative Total Duration of All EE	**Total EE % of TOT**
NA	**No**	**CEMS**	**or**	**COMS**	**Requirements**				

3) Duration of Monitor Downtime: Provide the following information regarding each period of monitor downtime. Make a separate table for each monitor, as needed.

3a) Monitor ID Number	3b) Pollutant or Parameter Monitored	3c) Emission Unit Being Monitored	3d) Beginning Date and Time of Downtime	3e) End Date and Time of Downtime	3f) Duration of Downtime	3g) Reason for Monitor Downtime (clarifying comments)	3h) Corrective Action Taken (clarifying comments)
NA							

***Opacity time listed in minutes**

3i) Total Duration of Downtime: _____

4) Duration of Excess Emissions: Provide the following information regarding each individual excess emission identified by a monitor. Make a separate table for each monitor, as needed.

4a) Emission Unit ID Number	4b) Monitor ID Number	4c) Pollutant or Parameter Monitored	4d) Beginning Date and Time of EE	4e) End Date and Time of EE	4f) Limit and Averaging Period	4g) Highest Reading of EE with Units (i.e. 5, Lb/Hr, Etc)	4h) Duration of Exempt EE (include these entries as part of 4i)	4i) Total Duration of All EE	4j) Cause of EE (clarifying comments)	4k) Corrective Action Taken (Clarifying Comments)
NA										
						4l) Cumulative Duration of Exempt Excess Emissions:			**4m) Cumulative Total Duration of All Excess Emissions**	

5) Monitor Bypasses: Provide the following information for each period in which an emission unit is operating but is not being monitored because emissions were either partially or totally diverted around the monitoring system *See Minn. R. 7017.1110 subp. 2c*

5a) Monitor Id Number	5b) Emission Unit Required to be Monitored	5c) Pollutant and Limit Required to be Monitored	5d) Beginning Date And Time Of Bypass Period	5e) End Date and Time of Bypass Period	5f) Duration of Monitor Bypass (Minutes)	5g) Was P.C.E. Operating During Bypass Period?	5h) Duration of Allowable Monitor Bypass	5i) Reason for Monitor Bypass (clarifying comments)	5j) Corrective Action Taken (clarifying comments)
NA									
						5k) Total Duration of Allowable Monitor Bypass:	NA		

6) CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Responsible Official

Print name: Tracy Baysinger Title: Chief Environmental Officer

Signature: Tracy Baysinger (SP) Date: 1-29-13

Note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.

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

DRF-2

Deviation Reporting Form
Air Quality Permit Program

Doc Type: Excess Emission Report

General Information about Deviation and Compliance Reporting

If your permit requires you to submit deviation reports or an annual compliance certification, you should use the *Deviation Reporting Forms* (DRFs) and *Annual Compliance Certification Report* (CR-04), unless you get Minnesota Pollution Control Agency (MPCA) approval to use another format or your facility's permit specifies otherwise. There are two separate DRF forms: DRF-1 and DRF-2.

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Some examples: flow rate, temperature, throughput, control equipment operating parameters, fuel-use records

CR-04: is used to report facility compliance status at the end of each year *if required by your permit.*

Address hard copy report submittals to:
Air Compliance Tracking Coordinator
Minnesota Pollution Control Agency
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Or

E-mail a signed and scanned PDF copy to: AQRoutineReport.PCA@state.mn.us
(see e-mail instructions in "Routine Air Report Instructions Letter" at http://www.pca.state.mn.us/nwqh472)

General Facility Information

Facility name: Interplastic Corporation, Minneapolis, MN
AQ file no.: 1176-A
County: Hennepin
AQ permit no.: 05300251-003
Time period covered by report: ☐ January 1 - June 30 ☒ July 1 - December 31 2012 (year)

Description of Deviations

Provide the following information regarding each individual deviation from permit conditions identified by either your periodic or continuous monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

Date of deviation	Emission unit ID no.	Monitor ID no.	Cite permit condition which was deviated from	Detailed description of deviation, why it occurred, and corrective action taken
See	Attached	Sheet		

Description of Monitor Downtime

Provide the following information regarding each period when a periodic or continuous monitoring system for any permitted operating condition or surrogate parameter did not record required data. Use the same numbering system as used in facility permit.

Date and time of missed record	Monitor ID no.	Emission unit ID no.	Pollutant or parameter monitored	Cause of the monitor downtime and corrective action taken
See 07-03-12 Deviation	CE001	SV001	TO Temp (VOC)	See 07-03-12 Deviation
See 09-05-12 Deviation	CE001	SV001	TO Temp (VOC)	See 09-05-12 Deviation
See 11-30-12 Deviation	CE001	SV001	TO Temp (VOC)	See 11-30-12 Deviation

Description of Deviations:

Beginning Date and Time	End Date and Time	Total Duration Deviation	Emission Unit ID Number	Monitor ID Number	Cite permit condition which was deviated from	Cause of Deviation	Corrective Action Taken
07-02-12 0030 hrs	07-02-12 2020 hrs	Intermittent	SV001	CE001	Possible odor and excess emissions.	Blending during maintenance shutdown	Maintenance work completed
07-03-12 0008 hrs	07-02-12 2020 hrs	2.9 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average. No temperature monitor for 1.5 hrs 0912-1342 hrs.	Start-up problem after maintenance shutdown. Fumes blower blowing out pilot.	Maintenance repaired the blower problem and restarted the thermal oxidizer.
07-23-12 0055 hrs	07-23-12 0255 hrs	2.0 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average. PC scrubber did not activate.	Car hit transformer, power glitch took down TO. Failed fire eye at restart.	Power restored; maintenance corrected electrical problem and restarted TO.
07-26-12 0220 hrs	NA	NA	SV001	CE001	Nuisance odor.	Blower A lost vacuum.	Switched to Blower B and inspected Blower A but could find no issues.
09-05-12 0833 hrs	09-05-12 1003 hrs	1.5 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average. No temperature monitor 0848-1020 hrs. PC scrubber did not activate.	Neighborhood Excel Energy Power Outage.	Power restored.
10-14-12 0642 hrs	10-14-12 1033 hrs	3.9 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average	Power glitch caused TO to go down.	Maintenance reset TO.
11-21-12 1520.hrs	11-23-12 1357 hrs	Intermittent	SV001	CE001	Possible odor and excess emissions. PC scrubber not activated during shutdown.	Blending during maintenance shutdown.	Maintenance work completed
11-30-12 0958 hrs	11-30-12 1115 hrs	1.3 hrs	SV001	CE001	No Temperature Monitor 0958-1115 hrs. TO Temp did not fall below permit temp.	Electrical load to UPS power to computer controls failed. UPS installed as a back up not sized properly.	Removed UPS until electrician evaluates electrical load and UPS is properly sized for the load.
12-11-12 1249 hrs	12-11-12 1438 hrs	1.8 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average	Nitrogen leak in supply to valves controlling TO.	Repair completed.
12-12-12 0301 hrs	12-12-12 0910 hrs	6.1 hrs	SV001	CE001	TO Temp fell below permit limit based on 3-hr rolling average	Problem with outside pressure switch on discharge side of combustion air blower.	Maintenance reset switch and restarted TO. Ordered replacement switch installed 12-14-12.
12-14-12 1118 hrs	12-14-12 1429 hrs	3.2 hrs	SV001	CE001	Possible nuisance odor. TO Temp fell below permit limit based on 3-hr rolling average	Maintenance shutdown to replace outside pressure switch (see 12-12-12 incident).	Pressure switch replaced.

Summary of Deviations and Monitor Downtime

Fill out a separate row of the table for each periodic monitoring system.

Monitor ID no. (Use same number from facility permit.)	**Total number of readings taken** (during period covered by report)	**Total number of readings indicating deviations**	**Percent of readings indicating deviations** (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.)	**Total no. of readings missed** (Indicate the number of times that data was not recorded as required by your permit.)	**Total percentage of readings missed** (Divide number of readings *missed* during reporting period by number or readings *required* during same period. Then multiply by 100.)
CE001	Total Operating Time 2158.17 hrs 3rd Qtr	6.4 hrs excess emission 3rd Qtr	0.30%	3.0 hrs monitor downtime 3rd Qtr	0.14%
CE001	Total Operating Time 2142.92 hrs 4th Qtr	15.0 hrs excess emissions 4th Qtr	0.70%	1.3 hrs monitor downtime 4th Qtr	0.06%

Deviations Discovered Through Recordkeeping

List each deviation that was discovered through recordkeeping (e.g., your fuel use records indicate that you exceeded your fuel use limits). Provide at least the date(s) of each deviation; magnitude of deviation; associated emission unit, the cause of each deviation, and the corrective action taken.

1. No deviations discovered through recordkeeping.
2.
3.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Responsible Official

Print name: Tracy Baysinger Title: Chief Environmental Officer

Signature: Tracy Baysinger (SP) Date: 1-29-13

Note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.

Due Dates

Air Emission Permit – Option D, where control equipment is used to reduce actual reported emissions	Deviation Report – if a deviation occurred	January 30 and July 30
Air Emission Permit – State or Federal Total Facility or General	Deviation Report – whether or not a deviation occurred	January 30 and July 30
	Compliance Certification	January 31