

US EPA ARCHIVE DOCUMENT

January 29, 2007

Mr. George Czerniak, Chief  
Air Enforcement and Compliance Assurance Branch  
Air and Radiation Division  
EPA Region V  
77 West Jackson Boulevard  
Chicago, Illinois 60604

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

Re: **Andersen Corporation PAL Semi-Annual Report**  
**Facility ID: 16300001**  
**XL Permit ANDXL-001**



To Whom It May Concern:

Enclosed please find the PAL Semi-Annual Report as required by Andersen's XL Permit for the Bayport Facility. This report covers the second half of 2007 reporting period of July 1, 2007 through December 31, 2007.

Please contact me at 651-264-7237 if you have any questions regarding this report.

Sincerely,

ANDERSEN CORPORATION

A handwritten signature in blue ink that reads 'Denise Kazmierczak'. The signature is fluid and cursive, with the first name 'Denise' being larger and more prominent than the last name 'Kazmierczak'.

Denise Kazmierczak, P.E.  
Supervisor, Environmental Management

cc: Andersen Community Advisory Committee Members

# **PAL Semi-Annual Report Andersen Corporation XL Permit**

**Reporting Period:  
July 1, 2007 – December 31, 2007**

**Report Date: January 29, 2008**

**Prepared by:**  
Andersen Corporation  
100 Fourth Avenue North  
Bayport, MN 55003  
Washington County

**TABLE OF CONTENTS**

	<u>Page No.</u>
<b>1.0 INTRODUCTION</b> .....	2
1.1 Summary of Compliance Status .....	2
1.2 Report Purpose and Scope .....	2
<b>2.0 VOC PAL</b> .....	3
<b>3.0 DATA RELIED UPON IN CALCULATING VOC EMISSIONS</b> .....	3
<b>4.0 CERTIFICATION</b> .....	5

**LIST OF TABLES:**

Table 1 – VOC Emissions

**LIST OF APPENDICES:**

- Appendix 1 – Semi-Annual Reporting Form PRF-1 for Plantwide Applicability Limits
- Appendix 2 – Other Deviations Not Provided on Form PRF-1
- Appendix 3 – 12-Month Rolling Sum VOC Emissions Reports
- Appendix 4 – Monthly VOC Emissions Reports



**1.0 INTRODUCTION**

The Andersen Corporation XL Permit was issued May 4, 2006. The XL Permit established a federal Plantwide Applicability Limit (PAL) for Volatile Organic Compound (VOC) emissions. The VOC PAL is 2,397 tons per year as a 12-month rolling sum.

**1.1 Summary of Compliance Status**

As provided in this Report, the total monthly VOC emissions, as 12-month rolling sums, are below the federal VOC PAL of 2,397 tons/year for the Facility.

**1.2 Report Purpose and Scope**

In accordance with the XL Permit, PAL Semi-Annual Reports are required by January 30 and July 30 for the reporting periods of July 1 – December 31 and January 1 – June 30, respectively. This Report covers the reporting period of July 1, 2007 – December 31, 2007. This Report is submitted to the Minnesota Pollution Control Agency (MPCA), the Environmental Protection Agency (EPA), and the Andersen Community Advisory Committee (CAC). It meets the requirements of the XL Permit Section 8 Table 4 Submittals, and Section 8.D. PAL Semi-Annual Report (Air), in which the following items shall be included:

- Updated MPCA air permit application forms showing changes to stacks, emission units, tanks, and controls.
- Identification of the Permittee and permit number.
- Total annual emissions (tons/year) of VOC on a 12-month rolling total for each month in the reporting period.
- Data relied upon, including but not limited to Quality Assurance or Quality Control (QA/QC) data, in calculating the monthly and annual VOC emissions.
- A list of any VOC-emitting units modified, removed or added to the facility.
- The number, duration, and cause of any deviations or monitoring malfunctions associated with any VOC-emitting emissions unit or associated control or monitoring equipment, and any corrective action taken.
- A notification of shutdown of any monitoring system associated with a VOC-emitting unit.
- A signed statement by the responsible official certifying the truth, accuracy, and completeness of the information provided in the report.

**2.0 VOC PAL**

The requirements of the PAL Semi-Annual Report are provided on MPCA's Form PRF-1, Semi-Annual Reporting Form for Plantwide Applicability Limits, in Appendix 1. Appendix 2 includes other deviations not provided on Form PRF-1.

There are no updated air permit application forms to provide in this PAL Semi-Annual Report. Equipment modified, removed or added is listed on Table 1 of Form PRF-1.

**3.0 DATA RELIED UPON IN CALCULATING VOC EMISSIONS**

VOC PAL emissions include the following Permit process groups: 001 Preservative Processes, 002 Painting Processes, 004, Vinyl and Other Plastic or Composite Processes, 005 Combustion Sources, and 006 Miscellaneous VOC Sources. A summary of the monthly emissions and the 12-month rolling sum emissions for each month in the reporting period is provided in Table 1.

The data relied upon in calculating the VOC emissions is provided in Appendix 3 (12-Month Rolling Sum VOC Emissions Reports) and Appendix 4 (Monthly VOC Emissions Reports). These reports are generated from a database system developed by Andersen to track all material usage (e.g., purchased quantities, throughput amounts) and calculate associated emissions for each permitted process group for the timeframe specified (e.g., calendar month or 12 calendar months). Additional information on how the VOC emissions were calculated is available on-site for agency inspection.

QA/QC includes an internal system of checks and verifications that all data has been received from suppliers and for internal processes. The data is entered into the database system and then an additional check is performed to assure the data was entered correctly. If any errors are found they are immediately corrected. When a report is run from the database system, it calculates emissions based on the database information at that point in time; therefore, the most current and accurate data is captured each time a report is run.

Destruction efficiency of the Regenerative Thermal Oxidizer (RTO) is demonstrated through continuous temperature monitoring, verified daily. Temperature monitoring records are available on-site for agency inspection.



The RTO control equipment, located on the Door paintline process, began operation on January 14, 2006. Per the XL Permit, the control efficiency being applied since start-up is 95% destruction and 95.73% capture (based on the last approved performance test for the previous catalytic oxidizer control equipment), for an overall control efficiency of 90.94%. This value was used until the performance test for the RTO system (completed in April 2006) was approved by the MPCA on November 5, 2007. Since that date, the control efficiency applied is 90.05% based on 97.67% destruction and 92.20% capture.

Table 1: VOC Emissions

Reporting Period: 2nd Half 2007 (July 1 - December 31)

VOC PAL: 2,397 tons/year

	Total Monthly Emissions (tons)	12-Month Rolling Sum* (tons/yr)
<b>Prior Reporting Periods Emissions</b>		
July 2006	118.3	1,358
August 2006	129.9	1,346
September 2006	82.7	1,307
October 2006	122.4	1,289
November 2006	106.9	1,286
December 2006	97.0	1,271
January 2007	72.3	1,258
February 2007	66.4	1,232
March 2007	75.2	1,204
April 2007	70.2	1,167
May 2007	81.1	1,143
June 2007	103.3	1,126
<b>Current Reporting Period Emissions</b>		
July 2007	108.7	1,116
August 2007	112.1	1,098
September 2007	82.9	1,098
October 2007	103.0	1,079
November 2007	74.1	1,046
December 2007	113.3	1,062

Note - Total Monthly Emissions and 12-Month Rolling Sums from the previous semi-annual reporting period may have been updated from those reported in the previous Semi-Annual Report to account for QA/QC of the data.