

## Appendix B:

### Justification for Discontinuing the use of the Incinerator at Northern Engraving - Sparta

NEC is basing this request on the following logic:

1. P32 coating and P33 metal spray are the only processes controlled by the incinerator. The following chart shows the comparison between the VOC emissions and the VOCs destroyed by the incinerator.

<u>Year</u>	<u>1998</u>	<u>1999</u>	<u>2000</u>
VOCs destroyed	4.23 tons	3.94 tons	3.51 tons
Total facility VOC emissions	33.4 tons	32.0 tons	30.0 tons

2. The natural gas usage for 1999 and 2000, as estimated for the annual report to WDNR is 7200 mcf and 6800 mcf respectively. According to the WDNR's emissions factors the emissions from the burning of this volume of natural gas is 0.34 - 0.36 tons of NOx and 0.29 - 0.30 tons of CO. At current prices the cost of natural gas would be greater than \$40,000.
3. The daily records required by for calculating compliance with RACT daily recordkeeping requirements requires between 0.8 and 1.0 full-time employee equivalents.
4. NEC estimates that, barring the need for major maintenance, the other costs associated with operating the incinerator is approximately \$1,000 per year for upkeep and minor maintenance and the amortization of a capital expenditure in excess of \$100,000. Stack testing is required every two years, at a cost of \$10,000 per test. This unit has historically required a major overhaul every 4-5 years. The year 2001 is the 4<sup>th</sup> year since the last overhaul, thus a major expense will occur in the near future.
5. NEC's operations are such that most of the VOC emissions (over 60%) is generated from clean up activities. These emissions are generally fugitive in nature and not easily captured for a control device. Thus NEC is utilizing a significant amount of resources; people, money and natural gas, to control a relatively small percent of its VOC emissions.
6. The last six years NEC has had VOC emissions below the 100 ton threshold required for mandating RACT compliance. Based on these reduced emissions, NEC has applied for synthetic minor source limits to its air permits. A synthetic minor source is not required to show RACT compliance, yet NEC cannot discontinue the use of the incinerator because of WDNR's "once in always in" policy. This policy eliminates a strong incentive for NEC and other companies to find other, more cost-effective measures to reduce VOC emissions.
7. NEC has shown a constant reduction in VOC emissions and has committed to

maintaining registered ISO 14001 EMS. In order to continue ISO 14001 registration environmental objectives and targets **must** be set. NEC has committed significant resources in both time and money to setting and achieving these environmental targets and objectives. NEC feels that the resources that continued use of the incinerator currently demands would be better spent in achieving the ISO 14001 targets. NEC has shown the commitment to accomplishing its environmental goals and has a track record of success in this area.