



Appendix C.

Justification for discontinuing the use of the Incinerator at Northern Engraving Corporation – West Salem

Northern Engraving Corporation (NEC) is basing this request on the following logic:

1. Two coating on metal lines are the processes controlled by incineration. A comparison of VOCs destroyed by incineration follows:

Year	<u>1999</u>	<u>2000</u>	<u>2001</u>	<u>2002</u>
VOCs destroyed (tons)	5.6	4.6	2.7	1.8
Total facility VOC emissions (tons)	85.1	61.3	43.1	31.3

2. The natural gas usage for incineration for 2000, 2001 and 2002 is estimated as follows. Using AP-42 emission factors NO_x and CO from fuel burning are calculated as follows. At current prices the annual cost of natural gas would be approximately \$17,000.

Year	<u>2000</u>	<u>2001</u>	<u>2002</u>
Natural gas used (mcf)	2700	1700	1600
NO _x emissions (tons)	0.09	0.14	0.13
CO emissions (tons)	0.07	0.11	0.10

3. The daily records required by for calculating compliance with RACT daily recordkeeping requirements requires between 2-3 hours per day.
4. NEC estimates that, barring the need for major maintenance, the other costs associated with operating the incinerator is approximately \$500 - \$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.
5. NEC's operations are such that most of the VOC emissions (40 - 50%) 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. Since calendar year 1999 Northern Engraving - West Salem 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.