

MEMO TO : File
Integrity Windows and Doors (Integrity)
Integrity Windows and Doors - Fargo
Cass County, North Dakota

FROM : Kari Thorsteinson *KT*
Environmental Scientist
Division of Air Quality
North Dakota Department of Environmental Quality (Department)

RE : Permit to Construct (PTC) (ACP-18318 v1.0)

DATE : September 2, 2026

Integrity contacted Department on October 21, 2025, after reviewing their Permit to Operate No. AOP-27826 v5.0 to request a correction. The Department was informed that the existing engines were considered demand response, not strictly emergency. As a result, it was determined that a change in status was needed for the facility from a true minor source to a synthetic minor source due to the operational restriction of 500 hours on each generator engine. The facility's potential to emit (PTE) was reviewed during PTC process. It was determined that the low HAP and VOC tracking in previous permits was no longer needed to ensure compliance. The conditions were rescinded.

A complete emission unit review was conducted. The emission units were re-named for easier identification. The facility discovered that an additional induced air, natural gas-fired make-up air heater was installed. The unit (EU 4) was added to the PTC. Four portable paint booths have been approved since the last permit update. Two of the booths are not yet installed.

Table 1 – Facility PTE Summary. All units are in tons per year (tpy).^A

Emission Unit Description	Emission Unit (EU)	CO	NO _x	SO ₂	VOCs	PM	PM ₁₀	PM _{2.5}	Total HAPs
Two generator engines	1 & 2	4.43	16.69	0.01	0.47	0.04	0.26	0.25	0.02
Paint booths (automatic and manual)	A1 through A4, M1 through M3, & P1 through P4	-	-	-	10.00 ^B	-	-	-	-
Heater	3	1.12	1.33	0.01	0.07	0.08	0.03	0.03	0.03
Heater	4	1.30	1.55	0.01	0.09	0.09	0.03	0.03	0.03
Three curing ovens	O1, O2, & O3	0.43	0.52	0.00	0.03	0.03	0.01	0.03	0.01
Curing oven	O4	0.25	0.30	0.00	0.02	0.02	0.01	0.01	0.01
Thirty-six heaters	Various	5.19	6.18	0.04	0.34	0.35	0.12	4.23	0.12
	Total:	12.7	26.6	0.1	11.0	0.6	0.4	4.6	0.2

ACP-18318 v1.0

A Abbreviations:

PM: filterable and condensable particulate matter

PM_{2.5}: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 2.5 microns ($\leq 2.5 \mu\text{m}$)

PM₁₀: filterable and condensable particulate matter with an aerodynamic diameter less than or equal to 10 microns ($\leq 10 \mu\text{m}$) including PM_{2.5}

SO₂: sulfur dioxide

NO_x: oxides of nitrogen

CO: carbon monoxide

VOCs: volatile organic compounds

HAPs: hazardous air pollutants as defined in Section 112(b) of the Clean Air Act

B The actual facility emissions for the last 5 years were reviewed. The facility did not exceed 10 tpy of VOCs during any 12 month rolling total.

After a complete review of the facility's emission units indicating that the facility is expected to comply with applicable federal and state air pollution rules and regulations, the Department will make a recommendation on PTC issuance for Integrity Windows and Doors - Fargo following the completion of a thirty-day public comment period. The public comment period will run from September 11, 2026, through October 10, 2026.

KMT:RLS