AIR EMISSION PERMIT NO. 05301074- 001
IS ISSUED TO

HIAWATHA METALCRAFT INC.
2631 31st Avenue South
Minneapolis, Hennepin County, MN 55406-1661

The emission units, control equipment and emission stacks at the stationary source authorized in this permit are as described in the following permit application(s):

Permit Type	Application Date
Total Facility Operating Permit	December 14, 1998

This permit authorizes the permittee to the stationary source at the address listed above unless otherwise noted in Table A. The permittee must comply with all the conditions of the permit. Any changes or modifications to the stationary source must be performed in compliance with Minn. R. 7007.1150 to 7007.1500. Terms used in the permit as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Part 70
Issue Date: May 17, 2001
Expiration: May 17, 2006
All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Major Facilities Section
Metro District

For Karen A. Studders, Commissioner
Minnesota Pollution Control Agency

TABLE OF CONTENTS

Notice to the Permittee

Permit Shield

Facility Description

Table A: Limits and Other Requirements

Table B: Submittals

Appendices: Attached

NOTICE TO THE PERMITTEE:

Your stationary source may be subject to the requirements of the Minnesota Pollution Control Agency's (MPCA) solid waste, hazardous waste, and water quality programs. If you wish to obtain information on these programs, including information on obtaining any required permits, please contact the MPCA general information number at:

Metro Area	(651) 296-6300
Outside Metro Area	1-800-657-3864
TTY	(651) 282-5332

The rules governing these programs are contained in Minn. R. 7000-7105. Written questions may be sent to: Minnesota Pollution Control Agency, 520 Lafayette Road North, St. Paul, Minnesota 55155-4194.

Questions about this air emission permit or about air quality requirements can also be directed to the telephone numbers and address listed above.

PERMIT SHIELD:

Subject to the limitations in Minn. R. 7007.1800, compliance with the conditions of this permit shall be deemed compliance with the specific provision of the applicable requirement identified in the permit as the basis of each condition. Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements. Certain requirements which have been determined not to apply are listed in Table A of this permit.

FACILITY DESCRIPTION:

Hiawatha Metalcraft Inc. (Hiawatha) is a "job shop" metal finishing facility with three separate metal coating lines. Hiawatha processes aluminum only. Aluminum oxide is applied to this base metal for a variety of reasons including wear, corrosion resistance, electrical resistance, and overall protection of the parts that are finished. Anodizing is applied through the use of electricity and through nonelectrical processes. Parts are cleaned in a nonalkaline cleaner, etched in a caustic soda solution, desmutted, anodized and sealed. The facility also operates a solvent degreasing unit, two paint spray booths, and several natural gas combustion units for heating the buildings and process tanks. The facility consists of two buildings. Plant 1 processes aluminum for chromic acid anodizing, sulfuric acid anodizing, chromate conversion coating and painting. The processes in Plant 3 Duranodic Architectural anodizing and sulfuric acid anodizing. There is no Plant 2. The SIC code for the plating industry is 3471.

In Plant 1, large parts are racked and placed in a nonalkaline cleaner solution, then on to a caustic soda solution. The parts are then moved to a desmutting tank and then to a tank for sulfuric acid anodizing. The parts are now ready to be sealed if they will have a natural finish or dyed if a colored finish is required. Clear parts are sealed in a nickel fluoride solution and colored parts are placed in one of the dye tanks and then sealed in nickel acetate. Smaller parts are racked and sent to the vapor degreaser. After degreasing they are run through the same processes as the large parts.

Other processes in Plant 1 include chromic acid anodizing and chromate conversion. Small and large parts are racked and cleaned prior to chromic acid anodizing. Parts are then sealed in potassium dichromate solution or nickel acetate then dried and unracked. For chromate conversion, parts are racked and cleaned, etched in caustic soda, desmutted, and placed in an iridite solution.

In Plant 3 parts are racked, cleaned, etched, and desmutted prior to anodizing. Anodizing in Plant 3 may include Duranodic Architectural anodizing or clear sulfuric anodizing.

The facility currently has no pollution control equipment on any of its anodizing operations. Mat filters are used on the paint booths. Most of the process tanks have an associated duct and fan which vents to the roof. The facility has seven stacks or roof vents. During all but the winter months plant employees keep the windows and doors to the facility open due to the heat generated by the process equipment.

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Table A contains limits and other requirements with which your facility must comply. The limits are located in the first column of the table (What To do). The limits can be emission limits or operational limits. This column also contains the actions that you must take and the records you must keep to show that you are complying with the limits. The second column of Table A (Why to do it) lists the regulatory basis for these limits. Appendices included as conditions of your permit are listed in Table A under total facility requirements.

Subject Item: **Total Facility**

What to do	Why to do it
AIR TOXICS	hdr
The potential emissions rates of air toxics as reported in the permit application are above the Screening Emission Rates (SERs) for several hazardous air pollutants (HAPs). The Permittee may conduct any of the iterative screening or remediation techniques from Section 5 of the "Air Emission Permit Writers Guide to Air Toxic Risk Evaluation" to better characterize HAP emissions or otherwise reduce the risk below levels causing unacceptable human health concerns. Within 90 days of permit issuance the Permittee shall submit a plan with a schedule to better characterize HAP emissions or otherwise reduce HAPs below levels causing unacceptable human health concerns.	Minn. R. 7007.0800, Subp. 2; Minn. Stat. 116.07, subd. 4a
The Permittee shall join and participate in the National Metal Finishers Strategic Goals Program within 90 days of Permit Issuance. The objective of this program is to decrease releases from, and increase efficiency of metal finishers by reducing the quantities of hazardous chemicals, water and electricity used per product, and to more efficiently recycle remaining waste.	Minn. R. 7007.0800, Subp. 2; Minn. Stat. 116.07, subd. 4a
HAP LIMITS	hdr
HAP-Single: less than or equal to 9.8 tons/year using 12-month Rolling Sum	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
HAPs - Total: less than or equal to 24 tons/year using 12-month Rolling Sum	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
HAP RECORDKEEPING	hdr
The Permittee shall retain purchase records of materials that contain HAPs on-site.	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
By the 15th day of each month the Permittee shall calculate HAP emissions for the previous month and keep the records on-site.	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
By the 15th day of each month the Permittee shall add the HAP emissions for the month to the HAP emissions for the previous 11 months to calculate the 12-month rolling sum and keep the records on-site.	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
The Permittee shall determine the HAP content of the materials from the supplier Materials Safety Data Sheets (MSDS). These MSDS's shall be kept on-site	Synthetic Minor Limit to avoid major source status under 40 CFR 70.2
OPERATIONAL REQUIREMENTS	hdr
Operation and Maintenance Plan: Retain at the stationary source an operation and maintenance plan for all air pollution control equipment.	Minn. R. 7007.0800, subp. 14 and Minn. R. 7007.0800, subp. 16(J)
Operation Changes: In any shutdown, breakdown, or deviation the Permittee shall immediately take all practical steps to modify operations to reduce the emission of any regulated air pollutant. The Commissioner may require feasible and practical modifications in the operation to reduce emissions of air pollutants. No emissions units that have an unreasonable shutdown or breakdown frequency of process or control equipment shall be permitted to operate.	Minn. R. 7019.1000, subp. 4
Air Pollution Control Equipment: Operate all pollution control equipment whenever the corresponding process equipment and emission units are operated, unless otherwise noted in Table A.	Minn. R. 7007.0800, subp. 2; Minn. R. 7007.0800, subp. 16(J)
Fugitive Emissions: Do not cause or permit the handling, use, transporting, or storage of any material in a manner which may allow avoidable amounts of particulate matter to become airborne. Comply with all other requirements listed in Minn. R. 7011.0150.	Minn. R. 7011.0150
Noise: The Permittee shall comply with the noise standards set forth in Minn. R. 7030.0010 to 7030.0080 at all times during the operation of any emission units. This is a state only requirement and is not enforceable by the EPA Administrator or citizens under the Clean Air Act.	Minn. R. 7030.0010 - 7030.0080
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A or B.	Minn. R. ch. 7017
Limits set as a result of a performance test (conducted before or after permit issuance) apply until superseded as specified by Minn. R. 7017.2025 following formal review of a subsequent performance test on the same unit.	Minn. R. 7017.2025
MONITORING REQUIREMENTS	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Monitoring Equipment: Install or make needed repairs to monitoring equipment within 60 days of issuance of the permit if monitoring equipment is not installed and operational on the date the permit is issued.	Minn. R. 7007.0800, subp. 4(D)
Monitoring Equipment Calibration: Annually calibrate all required monitoring equipment (any requirements applying to continuous emission monitors are listed separately in this permit).	Minn. R. 7007.0800, subp. 4(D)
Operation of Monitoring Equipment: Unless otherwise noted in Tables A and/or B, monitoring a process, or control equipment connected to that process, is not necessary during periods when the process is shutdown, or during checks of the monitoring systems, such as calibration checks and zero and span adjustments. If monitoring records are required, they should reflect any such periods of process shutdown or checks of the monitoring system.	Minn. R. 7007.0800, subp. 4(D)
Circumvention: Do not install or use a device or means that conceals or dilutes emissions, which would otherwise violate a federal or state air pollution control rule, without reducing the total amount of pollutant emitted.	Minn. R. 7011.0020
RECORDKEEPING	hdr
Recordkeeping: Maintain records describing any insignificant modifications (as required by Minn. R. 7007. 1250, subp. 3) or changes contravening permit terms (as required by Minn. R. 7007.1350 subp. 2), including records of the emissions resulting from those changes.	Minn. R. 7007. 0800, subp. 5(B)
Recordkeeping: Retain all records at the stationary source for a period of five (5) years from the date of monitoring, sample, measurement, or report. Records which must be retained at this location include all calibration and maintenance records, all original recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. Records must conform to the requirements listed in Minn. R. 7007.0800, subp. 5(A).	Minn. R. 7007.0800, subp. 5(C)
REPORTING	hdr
Shutdown Notifications: Notify the Commissioner at least 24 hours in advance of a planned shutdown of any control equipment or process equipment if the shutdown would cause any increase in the emissions of any regulated air pollutant. If the owner or operator does not have advance knowledge of the shutdown, notification shall be made to the Commissioner as soon as possible after the shutdown. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 3. At the time of notification, the owner or operator shall inform the Commissioner of the cause of the shutdown and the estimated duration. The owner or operator shall notify the Commissioner when the shutdown is over.	Minn. R. 7019.1000, subp. 3
Breakdown Notifications: Notify the Commissioner within 24 hours of a breakdown of more than one hour duration of any control equipment or process equipment if the breakdown causes any increase in the emissions of any regulated air pollutant. The 24-hour time period starts when the breakdown was discovered or reasonably should have been discovered by the owner or operator. However, notification is not required in the circumstances outlined in Items A, B and C of Minn. R. 7019.1000, subp. 2. At the time of notification or as soon as possible thereafter, the owner or operator shall inform the Commissioner of the cause of the breakdown and the estimated duration. The owner or operator shall notify the Commissioner when the breakdown is over.	Minn. R. 7019.1000, subp. 2
Notification of Deviations Endangering Human Health or the Environment: As soon as possible after discovery, notify the Commissioner or the state duty officer, either orally or by facsimile, of any deviation from permit conditions which could endanger human health or the environment.	Minn. R. 7019.1000, subp. 1
Notification of Deviations Endangering Human Health or the Environment Report: Within 2 working days of discovery, notify the Commissioner in writing of any deviation from permit conditions which could endanger human health or the environment. Include the following information in this written description: 1. the cause of the deviation; 2. the exact dates of the period of the deviation, if the deviation has been corrected; 3. whether or not the deviation has been corrected; 4. the anticipated time by which the deviation is expected to be corrected, if not yet corrected; and 5. steps taken or planned to reduce, eliminate, and prevent reoccurrence of the deviation.	Minn. R. 7019.1000, subp. 1
MISCELLANEOUS REQUIREMENTS	hdr
Application for Permit Amendment: If a permit amendment is needed, submit an application in accordance with the requirements of Minn. R. 7007.1150 through Minn. R. 7007.1500. Submittal dates vary, depending on the type of amendment needed.	Minn. R. 7007.1150 through Minn. R. 7007.1500

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Extension Requests: The Permittee may apply for an Administrative Amendment to extend a deadline in a permit by no more than 120 days, provided the proposed deadline extension meets the requirements of Minn. R. 7007.1400, subp. 1(H).	Minn. R. 7007.1400, subp. 1(H)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
Inspections: Upon presentation of credentials and other documents as may be required by law, allow the Agency, or its representative, to enter the Permittee's premises to have access to and copy any records required by this permit, to inspect at reasonable times (which include any time the source is operating) any facilities, equipment, practices or operations, and to sample or monitor any substances or parameters at any location.	Minn. R. 7007.0800, subp. 9(A)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
The Permittee may be required to submit a Risk Management Plan (RMP) under the federal rule, 40 CFR pt. 68. Each owner or operator of a stationary source, at which a regulated substance is present above a threshold quantity in a process, shall design and implement an accidental release prevention program. The RMPs must be submitted to a centralized location as specified by US EPA. RMP submittal information may be obtained at http://www.epa.gov/swercepp or by calling 1-800-424-9346. These requirements must be complied with no later than the latest of the following dates: (1) June 21, 1999; (2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or (3) The date on which a regulated substance is first present above a threshold quantity in a process.	40 CFR pt. 68
ONGOING COMPLIANCE STATUS REPORTS	hdr
Contents of Ongoing Compliance Status Reports. The summary report to document the ongoing compliance status of the source must contain the following information: (i) The company name and address; (ii) An identification of the operating parameter that is monitored for compliance determination, as required by 40 CFR 63.343(c); (iii) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by 40 CFR 63.347(e); (iv) The beginning and ending dates of the reporting period; (v) A description of the type of process performed in the affected source; (vi) The total operating time of the affected source during the reporting period;	40 CFR 63.347(g)(3)
Contents of Ongoing Compliance Status Reports (Continued) (vii) If the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with ' 63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis; (viii) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes;	40 CFR 63.347(g)(3) (Continued)
Contents of Ongoing Compliance Status Reports (Continued) (ix) A certification by a responsible official that the work practice standards in 40 CFR 63.342(f) were followed in accordance with the operation and maintenance plan for the source; (x) If the operation and maintenance plan required by 40 CFR 63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by 40 CFR 63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; (xi) A description of any changes in monitoring, processes, or controls since the last reporting period; (xii) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and (xiii) The date of the report.	40 CFR 63.347(g)(3) (Continued)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **GP 001 Paint Booths**

Associated Items: EU 001 Paint Booth

EU 002 Paint Booth

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011.0735. This limit applies to each unit individually.	Minn. R. 7011.0715, Subp. 1.A.
Opacity: less than or equal to 20 percent opacity . This limit applies to each unit individually.	Minn. R. 7011.0715, Subp. 1.B.
The condition of wall filters will be inspected daily as to allignment, saturation, tears and holes. The general condition of the wall filters will be inspected weekly as to allingment, saturation, tears and holes. A written record of the daily and weekly inspection and any action resulting from the inspection will be maintained on-site.	Minn. R. 7011.0715
The Company shall: maintain an inventory of spare parts that are subject to frequent replacement; train staff on the operation and monitoring of control equipment and trouble shooting; thoroughly inspect all control equipment at least annually, or as required by manufacturers specifications; respond to any abnormal operating conditions and record in a log any corrective action taken; and address any additional operation and maintenance items recommended by the manufacturer.	Minn. R. 7011.0070
Maintain records of the gallons of all paint used in the paint booths, the HAPs content of each paint used and the hours of operation for each paint booth. HAP content shall be determined from the material safety data sheets (MSDS). All of the above records and the MSDSs shall be kept on site.	40 CFR 70.2
Paint use will be limited to a 24-hour use level of 50% less than the daily potential, and an annual use level of 15% less than the annual potential, based on a maximum application rate of 3.75 gallons per hour. Paint use limits: - 45 gallons per 24-hours of operation, and - 4900 gallons per year on a 12-month rolling average basis	Limits to avoid exceedance of MDH tolerable risk levels

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **GP 002 Natural Gas Combustion Units**

Associated Items: EU 008 Make-Up Air

EU 009 Make-Up Air

EU 010 Make-Up Air

EU 011 Make-Up Air

EU 012 Fire Tubes

EU 013 Fire Tubes

EU 014 Fire Tubes

EU 015 Fire Tubes

EU 016 Fire Tubes

EU 017 Fire Tubes

EU 018 Fire Tubes

EU 019 Fire Tubes

EU 020 Fire Tubes

EU 021 Fire Tubes

EU 022 Fire Tubes

EU 023 Fire Tubes

EU 024 Fire Tubes

EU 025 Fire Tubes

EU 026 Fire Tubes

EU 027 Fire Tubes

EU 028 Fire Tubes

EU 029 Fire Tubes

EU 030 Fire Tubes

EU 031 Oven

EU 032 Boiler

EU 033 Boiler

EU 034 Roof Top Heater

What to do	Why to do it
Opacity: less than or equal to 20 percent opacity except for one six-minute period per hour of not more than 60 percent opacity. An exceedance of this opacity standard occurs whenever any one-hour period contains two or more six-minute periods during which the average opacity exceeds 20 percent or whenever any one-hour period contains one or more six-minute periods during which the average opacity exceeds 60 percent.	Minn. R. 7011.0510, Subp. 2
Total Particulate Matter: less than or equal to 0.4 lbs/million Btu heat input	Minn. R. 7011.0510, Subp. 1; Minn. R. 7011.0545
Sulfur Dioxide: less than or equal to 2.0 lbs/million Btu heat input	Minn. R. 7011.0510, Subp. 1; Minn. R. 7011.0545
The permittee shall burn only natural gas or propane in EU008 to EU034. Records of fuel usage shall be kept on-site.	Minn. R. 7011.0545

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **EU 003 Chromic Acid Tank**

Associated Items: SV 003

What to do	Why to do it
GENERAL PROVISIONS	hdr
The General Provisions that apply to Subpart N are shown in Table 1 to Subpart N of Part 63 which is attached to this permit	40 CFR Part 63
STANDARDS FOR DECORATIVE CHROMIUM ELECTROPLATING TANKS USING A CHROMIC ACID BATH AND CHROMIUM ANODIZING TANKS	hdr
Plating bath components shall include a chemical fume suppressant containing a wetting agent when purchased.	40 CFR Part 63.342(d)
Chromium compounds: less than or equal to 0.01 milligrams/DSCM . The permittee shall comply with the standard by not allowing the surface tension of the anodizing bath contained within the affected source to exceed 45 dynes per centimeter at any time during operation of the tank as a chemical fume suppressant containing a wetting agent is used.	40 CFR Part 63.342(d)
If a chemical fume suppressant containing a wetting agent is purchased and used as a bath component, Hiawatha shall control chromium discharged to the atmosphere by not allowing the surface tension of the anodizing bath contained within the affected source to exceed 45 dynes per centimeter at any time during operation of the tank.	40 CFR Part 63.342(d)(2)
MONITORING TO DEMONSTRATE CONTINUOUS COMPLIANCE	hdr
The permittee shall monitor the surface tension of the anodizing bath. Operation of the affected source at a surface tension greater than 45 dynes/cm shall constitute noncompliance with the standards.	40 CFR 63.343(c)(5)(ii)
The surface tension shall be measured once every four hours during operation of the tank with a stalagmometer or a tensiometer as specified in Method 306B, Part 63, Appendix A	40 CFR 63.343(c)(5)(ii)(A)
The time between monitoring can be increased if there have been no exceedances. The surface tension shall be measured once every 4 hours of operation for the first 40 hours of tank operation after the compliance date. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 8 hours of tank operation. Once there are no exceedances during 40 hours of tank operation, surface tension measurement may be conducted once every 40 hours of tank operation on an ongoing basis, until an exceedance occurs. The minimum frequency of monitoring allowed by this subpart is once every 40 hours of operation.	40 CFR 63.343(c)(5)(ii)(B)
Once an exceedance occurs as indicated through surface tension monitoring, the original monitoring schedule of once every 4 hours must be resumed. A subsequent decrease in frequency shall follow the schedule laid out in 40 CFR 63.343(c)(5)(ii)(B)	40 CFR 63.343(c)(5)(ii)(C)
Once a bath solution is drained from the tank and new solution added, the original monitoring schedule of once every 4 hours must be resumed, with a decrease in frequency allowed following the procedures of 40 CFR 63.343(c)(5)(ii)(B) and (C)	40 CFR 63.343(c)(5)(iii)
RECORDKEEPING	hdr
Maintain the following records for EU003: (1) inspection records for any air pollution control device and monitoring equipment, (2) records of all maintenance performed on EU003 or pollution control or monitoring device, (3) records of the occurrance, duration, and cause of each malfunction of EU003 or pollution control or monitoring device, (4) actions taken during periods of malfunction, (5) other records or checklists necessary to demonstrate consistency with the O&M plan, (6) test reports, (7) performance test conditions, (8) monitoring data, (9) all periods of excess emissions that occur during malfunction, (10) all periods of excess emissions that occur during periods other than malfunctions, (11) operating time, (12) cumulative rectifier capacity, (13) date and time of fume suppressant addition	40 CFR Part 63.346(b)
WORK PRACTICE STANDARDS	hdr
The permittee is subject to the Work Practice Standards of 40 CFR Part 63.342(f). The Work Practice Standards of 40 CFR Part 63.342(f), current as of permit issuance, are included below.	40 CFR Part 63.342(f)
At all times, including periods of startup, shutdown, and malfunction, owners and operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices, consistent with the operation and maintenance (O&M) plan required by 40 CFR 63.342(f)(3).	40 CFR Part 63.342(f)(1)(i)
Malfunctions shall be corrected as soon as practicable after their occurrence in accordance with the O&M plan required by 40 CFR 63.342(f)(3).	40 CFR Part 63.342(f)(1)(ii)

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Operation and maintenance requirements established pursuant to to section 112 of the Act are enforceable independent of emissions limitations or other requirements in relavent standards.	40 CFR Part 63.342(f)(1)(iii)
Determination of whether acceptable O&M procedures are being used will be based on information available to the Administrator, which may include, but is not limited to, monitoring results; review of the operation and maintenance plan, procedures, and records; and inspection of the source.	40 CFR Part 63.342(f)(2)(i)
Based on the results of a determination made under 40 CFR 63.342(f)(2)(i), the Administrator may require that the permittee make changes to the operation and maintenance plan required by 40 CFR 63.342(f)(3). Revisions may be required if the Administrator finds that the plan: (A) does not address a malfunction that has occurred; (B) fails to provide for the operation of the source, the air pollution control techniques, or the control system or the process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or (C) does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as possible.	40 CFR Part 63.342(f)(2)(ii)
Prepare an O&M plan within 30 days if not completed at the time of permit issuance. The plan shall include the following elements: (A) the plan shall specify the O&M criteria for the unit, the add-on air pollution control device, and the process and control system monitoring equipment, and shall include a standardized checklist to document the O&M of the unit; (B) the plan shall incorporate the work practice standards for any air pollution control or monitoring equipment; (C) proposed work practice standards for any air pollution control device or monitoring equipment not listed in 40 CFR 63.342 Table 1; (D) procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and (E) a systematic procedure for identifying malfunctions of process equipment, air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions.	40 CFR Part 63.342(f)(3)(i)
If the O&M plan fails to address an event that meets the characteristics of a malfunction at the time the plan is developed, the permittee shall revise the O&M plan within 45 days after such an event occurs.	40 CFR Part 63.342(f)(3)(ii)
Recordkeeping associated with the O&M plan is identified in 40 CFR 63.346(b). Reporting associated with the O&M plan is identified in 40 CFR 63.347(g) and (h) and 40 CFR 63.342(f)(3)(iv).	40 CFR Part 63.342(f)(3)(iii)
If action taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the O&M plan, the permittee shall record the actions taken for that event and shall report by phone such actions within two working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within seven working days after the end of the event, unless the permittee makes alternate reporting arrangements with the Administrator in advance.	40 CFR Part 63.342(f)(3)(iv)
The permittee shall keep the written O&M plan on record after it is developed to be made available for inspection, upon request, for the life of the unit or until the unit is no longer subject to the provisions of this subpart. If the O&M plan is revised, the permittee shall keep previous versions of the O&M plan on record for a period of five years after each revision to the plan.	40 CFR Part 63.342(f)(3)(v)
The permittee may use applicable standard operating procedures manuals, OSHA plans, or other existing plans to satisfy the O&M plan requirement, provided the alternative plans meet the requirements of this section.	40 CFR Part 63.342(f)(3)(vi)
The Operation and Maintenence Plan, including all elements of 40 CFR 63.342(f)(3) (A) to (E), shall be incorporated by reference and included as an appendix to the permit.	40 CFR Part 63.342(f)(3)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: EU 004 Degreaser

What to do	Why to do it
DESIGN REQUIREMENTS	hdr
Reduced Room Drafts. Ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine does not exceed 50 feet per minute at any time.	40 CFR Section 63.463(a)(1)(ii)
The vapor degreaser shall have freeboard ratio of 0.75 or greater.	40 CFR Section 63.463(a)(2)
The vapor degreaser shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 11 feet per minute or less from the initial loading of the parts through removal of cleaned parts.	40 CFR Section 63.463(a)(3)
The vapor degreaser shall be equipped with a vapor level control device that shuts off sump heat if the vapor level in the vapor cleaning machine rises above the height of the primary condenser or if the sump liquid solvent level drops to the sump heater coils	40 CFR Section 63.463(a)(4) and (5)
The vapor degreaser shall have a primary condenser.	40 CFR Section 63.463(a)(6)
The permitte shall maintain an idling emission rate of less than 0.045 pounds per hour per square foot of solvent/air interface area.	40 CFR Section 63.463(b)(1)(ii)
WORK PRACTICE STANDARDS	hdr
Control Air disturbances across the cleaning machine opening(s) by incorporating the control equipment or techniques (i) cover(s) to each solvent cleaning machine shall be in place during the idling mode, and during the downtime mode unless either the solvent has been removed from the machine or maintenance or monitoring is being performed that requires the cover(s) to not be in place; (ii) a reduced room draft as described in 63.463(e)(2)(ii)	40 CFR Section 63.463(d)(1)
The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50% of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3ft/min) or less.	40 CFR Section 63.463(d)(2)
Any spraying operations shall be done within the vapor zone or within a section of the solvent cleaning machine that is not directly exposed to the ambient air (i.e., a baffled or enclosed area of the solvent cleaning machine).	40 CFR Section 63.463(d)(3)
Parts shall be oriented so that the solvent drains from them freely. Parts having cavities or blind holes shall be tipped or rotated before being removed from any solvent cleaning machine unless an equally effective approach has been approved.	40 CFR Section 63.463(d)(4)
Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.	40 CFR Section 63.463(d)(5)
During startup of each vapor cleaning machine, the primary condenser shall be turned on before the sump heater.	40 CFR Section 63.463(d)(6)
During shutdown of each vapor cleaning machine, the sump heater shall be turned off and the solvent vapor layer allowed to collapse before the primary condenser is turned off.	40 CFR Section 63.463(d)(7)
When solvent is added or drained from any solvent cleaning machine, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface.	40 CFR Section 63.463(d)(8)
Each solvent cleaning machine and associated controls shall be maintained as recommended by the manufacturers of the equipment or using alternative maintenance practices that have been demonstrated to the MPCA's satisfaction to achieve the same or better results as those recommended by the manufacturer.	40 CFR Section 63.463(d)(9)
Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning operating procedures, if requested during an inspection.	40 CFR Section 63.463(d)(10)
Waste solvent, still bottoms, and sump bottoms shall be collected and stored in closed containers. the closed containers may contain a device that would allow pressure relief, but would not allow liquid solvent to drain from the container.	40 CFR Section 63.463(d)(11)
Sponges, fabric, wood, and paper products shall not be cleaned.	40 CFR Section 63.463(d)(12)
COMPLIANCE REQUIREMENTS	hdr
Conduct an initial performance test to demonstrate compliance with the idling emission limit using the procedures in 40 CFR Section 63.465(a), Reference Method 307 in Appendix A of Part 63.	40 CFR Section 63.463

If a reduced room draft is used to comply with these standards, the owner or operator shall comply with the two following requirements: - ensure that the flow or movement of air across the top of the freeboard area of the solvent cleaning machine or within the solvent cleaning machine enclosure does not exceed 15.2 meters per minute (50 ft/min) at any time as measured using the procedures in 63.466(d); and - establish and maintain the operating conditions under which the wind speed was demonstrated to be 15.2 meters per minute (50 ft/min) or less as described in 63.466 (d).	40 CFR Section 63.463(e)(2)(ii)
MONITORING	hdr
Annually monitor and record the temperature of the water in the cooling coils.	40 CFR 63.466
Measure the windspeed within 6 inches of the top of the freeboard area of the solvent cleaning machine. Conduct the initial monitoring test of the windspeed and the room parameters using the following procedures: - determine the direction of the wind current by slowly rotating the a velometer until the maximum speed is located - orient a velometer in the direction of the wind current at each of the four corners of the machine - record the reading for each corner - average the values obtained at each corner and record the average wind speed	40 CFR 63.466(d)(1)(i)
Monitor on a weekly basis the room parameters established during the initial compliance test used to achieve reduced room draft.	40 CFR 63.466(d)(1)(ii)
Demonstrate in the initial compliance test that the hoist cannot exceed 11 feet per minute.	40 CFR 63.466(d)(1)(ii)
Monitor hoist speed quarterly. If an exceedance of hoist speed occurs during quarterly monitoring, the monitoring frequency becomes monthly until one year of compliance without an exceedance is demonstrated.	40 CFR 63.466(c)
RECORDKEEPING	hdr
The owner or operator of a batch vapor cleaning machine complying with 40 CFR Section 63.463 shall maintain the following records in written or electronic form for the lifetime of the machine: (1) owners manuals or written maintenance and operating procedures, (2) the date of installation for the solvent cleaning machine and all of its control devices, (3) if a dwell is used to comply with these standards, records of the tests required in 40 CFR Section 63.465(d) to determine an appropriate dwell time for each part or part basket (4) for units complying with the idling emission standards, maintain records of the initial performance test, including the idling emission rates and the values of monitoring parameters measured during the test, (5) records of the halogenated HAP solvent content for each solvent used in a solvent cleaning machine subject to the provisions of this subpart.	40 CFR Section 63.467(a)
The owner or operator of a batch vapor cleaning machine complying with 40 CFR Section 63.463 shall maintain the following records in written or electronic form for a period of five years: (1) the results of control device monitoring required under 40 CFR Section 63.466, (2) information on the actions taken to comply with 40 CFR Section 63.463(e) and (f), (3) estimates of annual solvent consumption for each solvent cleaning machine.	40 CFR Section 63.467(b)
REPORTING	hdr
The owner or operator of an existing solvent cleaning machine subject to the provisions of Subpart T shall submit an initial notification within 30 days of permit issuance if this notification has not been submitted. This report shall include the following: (1) the name and address of the owner or operator, (2) the address of the solvent cleaning machine, (3) a brief description of the solvent cleaning machine including machine type, solvent/air interface area, and existing controls, (4) the date of installation or a letter certifying that the machine was installed prior to, or after, November 29, 1993, (5) the anticipated compliance approach for each machine, (6) an estimate of annual halogenated HAP solvent consumption for each machine.	40 CFR Section 63.468(a)
The owner or operator of a new solvent cleaning machine subject to Subpart T shall submit an initial notification letter to the Administrator within 30 days of permit issuance if this notification has not been submitted. This report shall include all of the information required in CFR Section 63.5(d)(1) and: (1) a brief description of the solvent cleaning machine including macine type, solvent/air interface area, and existing controls, (2) the anticipated compliance approach for each machine, (3) an estimate of annual halogenated HAP solvent consumption for each machine.	40 CFR Section 63.468(b)
The owner or operator of a batch vapor cleaning machine complying with 40 CFR Section 63.463 shall submit to the Administrator an initial statement of compliance for each solvent cleaning machine if the statement has not been submitted. The statement shall include the requirements specified in 40 CFR Section 63.468(d)(1) to (d)(6).	40 CFR Section 63.468(d)

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **EU 005 Chromate Conversion Line**

Associated Items: SV 005

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1.A.
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1.B.

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **EU 006 Bldg 1 Anodizing Line**

Associated Items: SV 006

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1.A.
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1.B.

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **EU 007 Bldg 3 Anodizing Line**

Associated Items: SV 007

What to do	Why to do it
Total Particulate Matter: less than or equal to 0.3 grains/dry standard cubic foot of exhaust gas unless required to further reduce emissions to comply with the less stringent limit of either Minn. R. 7011.0730 or Minn. R. 7011. 0735.	Minn. R. 7011.0715, Subp. 1.A.
Opacity: less than or equal to 20 percent opacity	Minn. R. 7011.0715, Subp. 1.B.

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **CE 001 Mat or Panel Filter**

Associated Items: EU 001 Paint Booth

What to do	Why to do it
The permittee shall: (1) maintain an inventory of spare parts that are subject to frequent replacement (2) train staff on the operation and monitoring of the wall filters and require staff to respond to indications of malfunction (3) thoroughly inspect the filters at least annually, or as required by manufacturers specs. (4) inspect monthly, or as required by manufacturers specs., components that are subject to wear or plugging (5) inspect quarterly, or as required by the manufacturing specification, components that are not subject to wear (6) maintain a record of activities conducted consisting of the activity completed, the date the activity was completed, and any corrective action taken (7) maintain a record of parts replaced, repaired, or modified for a period of five years	Minn. R. 7011.0075, subp. 2

TABLE A: LIMITS AND OTHER REQUIREMENTS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Subject Item: **CE 002 Mat or Panel Filter**

Associated Items: EU 002 Paint Booth

What to do	Why to do it
The permittee shall: (1) maintain an inventory of spare parts that are subject to frequent replacement (2) train staff on the operation and monitoring of the wall filters and require staff to respond to indications of malfunction (3) thoroughly inspect the filters at least annually, or as required by manufacturers specs. (4) inspect monthly, or as required by manufacturers specs., components that are subject to wear or plugging (5) inspect quarterly, or as required by the manufacturing specification, components that are not subject to wear (6) maintain a record of activities conducted consisting of the activity completed, the date the activity was completed, and any corrective action taken (7) maintain a record of parts replaced, repaired, or modified for a period of five years	Minn. R. 7011.0075, subp. 2

TABLE B: SUBMITTALS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

Table B lists most of the submittals required by this permit. Please note that some submittal requirements may appear in Table A or, if applicable, within a compliance schedule located in Table C. Table B is divided into two sections in order to separately list one-time only and recurrent submittal requirements.

Each submittal must be postmarked or received by the date specified in the applicable Table. Those submittals required by parts 7007.0100 to 7007.1850 must be certified by a responsible official, defined in Minn. R. 7007.0100, subp. 21. Other submittals shall be certified as appropriate if certification is required by an applicable rule or permit condition.

Send any application for a permit or permit amendment to:

Permit Technical Advisor
Permit Section
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Also, where required by an applicable rule or permit condition, send to the Permit Technical Advisor notices of:
- accumulated insignificant activities,
- installation of control equipment,
- replacement of an emissions unit, and
- changes that contravene a permit term.

Unless another person is identified in the applicable Table, send all other submittals to:

Supervisor
Compliance Determination Unit
Air Quality Division
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Send submittals that are required to be submitted to the U.S. EPA regional office to:

Mr. George Czerniak
Air and Radiation Branch
EPA Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Send submittals that are required by the Acid Rain Program to:

U.S. Environmental Protection Agency
Clean Air Markets Division
1200 Pennsylvania Avenue NW (6204N)
Washington, D.C. 20460

TABLE B: ONE TIME SUBMITTALS OR NOTIFICATIONS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

What to send	When to send	Portion of Facility Affected
Application for Permit Reissuance	due 180 days before expiration of Existing Permit	Total Facility

TABLE B: RECURRENT SUBMITTALS

05/17/01

Facility Name: Hiawatha Metalcraft Inc

Permit Number: 05301074 - 001

What to send	When to send	Portion of Facility Affected
Notification of compliance status	due 30 days after end of each calendar half-year following Permit Issuance. The owner or operator of an affected source that is located at a major source site shall submit a summary report to the Administrator to document the ongoing compliance status of the affected source. The report shall contain the information identified in 40 CFR 63.347(g)(3).	Total Facility
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The first semiannual report submitted by the Permittee shall cover the calendar half-year in which the permit is issued. The first report of each calendar year covers January 1 - June 30. The second report of each calendar year covers July 1 - December 31.	Total Facility
Semiannual Deviations Report	due 30 days after end of each calendar half-year following Permit Issuance. The owner or operator of a batch vapor cleaning machine shall submit an exceedance report to the Administrator semiannually except when the Administrator determines that more frequent reporting is necessary to accurately assess the compliance status or, an exceedance ocurrs. Once an exceedance has ocurred the owner or operator shall follow a quarterly reporting format until a request to reduce reporting frequency is approved. Exceedance reports shall be delivered or postmarked by the 30th day following the end of each calendar half or quarter, as appropriate. The report shall include the applicable information in 40 CFR Section 63.468(h)(1) to (3).	EU004
Annual Report	due 32 days after end of each calendar year following Initial Startup. The owner or operator of a batch vapor cleaning machine complying with 40 CFR Section 63.463 shall submit an annual report by February 1 of each year following the one for which the report is being made. This report shall include the following: (1) a signed statement from the owner or operator stating that, "all operators of solvent cleaning machines have recieved training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test in 40 CFR Section 63.463(d)(10).", (2) an estimate of the solvent consumption for each solvent cleaning machine during the reporting period.	EU004
Compliance Certification	due 31 days after end of each calendar year following Permit Issuance (for the previous calendar year). To be submitted on a form approved by the Commissioner, both to the Commissioner, and to the U.S. EPA regional office in Chicago. This report covers all deviations experienced during the calendar year. The EPA copy shall be sent to: Mr. George Czerniak, Chief, Air Enforcement and Compliance Assurance Branch, Air and Radiation Division, EPA Region V, 77 West Jackson Boulevard, Chicago, Illinois 60604	Total Facility
Emissions Inventory Report	due 91 days after end of each calendar year following Permit Issuance (April 1). To be submitted on a form approved by the Commissioner.	Total Facility

TECHNICAL SUPPORT DOCUMENT
For
DRAFT AIR EMISSION PERMIT NO. 05301074-001

This technical support document is for all the interested parties of the draft permit. The purpose of this document is to set forth the legal and factual basis for the draft permit conditions, including references to the applicable statutory or regulatory provisions.

1. General Information

1.1. Applicant and Stationary Source Location:

Owner and Operator Address and Phone Number (list both if different)	Facility Address (SIC Code: 3471)
Hiawatha Metalcraft Inc. 2631 31st Avenue South Minneapolis, MN 55406 (612) 721-6331	2631 31st Avenue South Minneapolis Hennepin County

1.2. Description of the Facility

Hiawatha Metalcraft Inc. (Hiawatha) is a "job shop" metal finishing facility with three separate metal coating lines. Hiawatha processes aluminum only. Aluminum oxide is applied to this base metal for a variety of reasons including wear, corrosion resistance, electrical resistance, and overall protection of the parts that are finished. Anodizing is applied through the use of electricity and through nonelectrical processes. Parts are cleaned in a nonalkaline cleaner, etched in a caustic soda solution, desmutted, anodized and sealed. The facility also operates a solvent degreasing unit, two paint spray booths, and several natural gas combustion units for heating the buildings and process tanks. The facility consists of two buildings. Plant 1 processes aluminum for chromic acid anodizing, sulfuric acid anodizing, chromate conversion coating and painting. The processes in Plant 3 Duranodic Architectural anodizing and sulfuric acid anodizing. There is no Plant 2. The SIC code for the plating industry is 3471.

In Plant 1, large parts are racked and placed in a nonalkaline cleaner solution, then on to a caustic soda solution. The parts are then moved to a desmutting tank and then to a tank for sulfuric acid anodizing. The parts are now ready to be sealed if they will have a natural finish or dyed if a colored finish is required. Clear parts are sealed in a nickel fluoride solution and colored parts are placed in one of the dye tanks and then sealed in nickel acetate. Smaller parts are racked and sent to the vapor degreaser. After degreasing they are run through the same processes as the large parts.

Other processes in Plant 1 include chromic acid anodizing and chromate conversion. Small and large parts are racked and cleaned prior to chromic acid anodizing. Parts are then sealed in potassium dichromate solution or nickel acetate then dried and unracked. For chromate conversion, parts are racked and cleaned, etched in caustic soda, desmutted, and placed in an iridite solution.

In Plant 3 parts are racked, cleaned, etched, and desmutted prior to anodizing. Anodizing in Plant 3 may include Duranodic Architectural anodizing or clear sulfuric anodizing.

The facility currently has no pollution control equipment on any of its anodizing operations. Mat filters are used on the paint booths. Most of the process tanks have an associated duct and fan which vents to the roof. The facility has seven stacks or roof vents. During all but the winter months plant employees keep the windows and doors to the facility open due to the heat generated by the process equipment.

1.3. Description of any changes allowed with this permit issuance

This is the first total facility permit issued to this facility.

1.4. Description of all amendments issued since the issuance of the last total facility permit and to be included in the Part 70 Permit.

Permit Number and Issuance Date	**Action Authorized**
05301074-001	This is the first permit issued for this facility.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary:

EU or GP #	SV#	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
GP001		Paint Booths	36.1	36.1	-	-	-	75.6	-	56.4	105.3
GP002		Natural Gas Combustion Units	-	0.16	0.014	2.09	1.76	-	1E-5	-	-
EU003		Chromic Acid Tank	-	-	-	-	-	-	-	0.07	0.07
EU004		Degreaser	-	-	-	-	-	-	-	39.7	39.7

EU or GP #	SV#	Emission Unit Description	PM tpy	PM10 tpy	SO2 tpy	NOx tpy	CO tpy	VOC tpy	Pb tpy	Single HAP tpy	All HAPs tpy
EU005		Chromate Conversion Line	1.6	1.6	-	-	-	-	-	1.61	1.64
EU006		Bldg 1 Anodizing Line	3.2	3.2	0.9	0.2	-	-	-	1.32	2.08
EU007		Bldg 3 Anodizing Line	11.8	11.8	0.9	0.5	-	-	-	6.22	10.38
Total Facility Limited Potential Emissions			52.7	52.7	1.81	2.79	1.76	75.6	1E-5	9.8	24
Total Facility Actual Emissions			4.2	4.2	0.4	0.2	-	10.8	-	8.7	13.7

Table 2. Facility and Permit Classification

Classification (put x in appropriate box)	Major/Affected Source	*Synthetic Minor	*Minor
PSD			X
NAAR			X
Part 70 Permit Program	X Affected Source under Subparts N and T of the NESHAPs		

* Refers to potential emissions that are less than those specified as major by 40 CFR 52.21, 40 CFR pt. 51 Appendix S, and 40 CFR pt. 70.

2. Regulatory and/or Statutory Basis

At the time of application submittal in 1996, Hiawatha was required to submit an application for a Part 70 permit as they were considered a major source of hazardous air pollutants (HAPs) for hard chrome electroplating and for their trichloroetheylene (TCE) degreasing operation. Since that time, they have discontinued the practice of hard chrome electroplating and have modified the solvent cleaning operation to reduce the TCE emissions. They are now subject to 40 CFR 63.342(d) Standards for Decorative Chromium Electroplating Tanks using Chromium Anodizing Tanks, and the halogenated solvent cleaning work practice standards in 40 CFR 63.643(d). The facility has not had an operating permit.

The Minnesota Pollution Control Agency (MPCA) forwarded corrected emissions data from the application to the Minnesota Department of Health (MDH) for their review. They conducted a nonsite-specific screening model to determine if any constituents should be further evaluated for their potential to pose a health risk. Several constituents such as cadmium, chromium compounds, MEK, hydrogen fluoride, nickel compounds and cyanide compounds all had potential emissions higher than one of the screening health risk values. Permit staff teamed with staff from the Environmental Outcomes Group to determine if reductions were required to reduce potential health risk or to see if site-specific modeling should be conducted to better define the risks.

The Natural Gas Combustion Units, Group 2, are required to only burn natural gas or propane and keep records of fuel usage on-site.

Regulatory Overview of Facility

EU, GRP, or SV #	Applicable Regulations	Comments:
Total Facility	40 CFR 63.347(g)	Ongoing compliance status report for a major chromium source
GP001	Minn. R. 7011.0715	Standards of Performance for Post-1969 Industrial Process Equipment
GP002	Minn. R. 7007.0510	Standards of Performance for Existing Indirect Heating Equipment
EU003 and EU004	40 CFR 63 Subp. A	National Emission Standards for Hazardous Air Pollutants (NESHAP), General Provisions. The general provisions that apply to each NESHAP are found in Table 1 to Subpart N and Appendix B to Subpart T
EU004	40 CFR 63 Subp. T	National Emission Standards and Work Practice Standards for Halogenated Solvent Cleaning
EU003	40 CFR 63 Subp. N	National Emission Standards and Work Practice Standards for Chromium Emissions From Chromium Anodizing Tanks

3. Technical Information

In working with metal finishing facilities in the metropolitan area over the last several years it has been noted that there are several factors that they have in common that cause potential environmental concerns. One is that they seem to be located in close proximity to residential areas. Second, they handle a wide variety of hazardous materials. Third, their air emissions have odors and irritating characteristics associated with them. Fourth, most have had multimedia environmental concerns including hazardous waste, wastewater, ground water, and air. Fifth, metal finishing facilities have had a history of complaints from the public.

For these reasons, the MPCA has required the Permittee to join and participate in the National Metal Finishers Strategic Goals Program. The objective of this program is to decrease releases from, and increase efficiency of metal finishers by reducing the quantities of hazardous chemicals, water and electricity used per product, and to more efficiently recycle remaining waste.

Also, the potential emission rates of air toxics as reported in the Hiawatha November 1998 permit application and accompanying materials are above the Screening Emission Rates (SERs) for several HAPs. The Permittee may conduct any of the iterative screening or remediation techniques from Section 5 of the "Air Emission Permit Writers Guide to Air Toxic Risk Evaluation" to better characterize HAP emissions or otherwise reduce the risk below levels causing unacceptable human health concerns within 90 days of permit issuance.

If adequate progress is not achieved in a timely manner through the Strategic Goals Program or the Permit Writers Guide, the MPCA reserves the authority to reopen the permit and add the requirement to implement the corrective measures determined to be appropriate.

Emission calculations are attached as Appendix A.

4. Conclusion

Based on the information provided by Hiawatha Metalcraft, the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05301074-001 and this technical support document, will not cause or contribute to a violation of applicable federal regulations and Minnesota rules.

Staff Members on Permit Team: Greg Kvaal, Robert Berg

Attachment: CD-01 Forms
Others specified in section 3