

AIR EMISSION PERMIT NO. 05300319- 001

IS ISSUED TO

AVTEC FINISHING SYSTEMS INC.

Avtec Finishing Systems Inc.
9101 Science Center Drive
New Hope, Hennepin County, MN 55428

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

Permit Type	Application Date
Total Facility Operating Permit	03/14/2005

This permit authorizes the Permittee to operate 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 are as defined in the state air pollution control rules unless the term is explicitly defined in the permit.

Permit Type: Federal; Pt 70/True Minor for NSR

Issue Date: December 5, 2005

Expiration: December 5, 2010
All Title I Conditions do not expire.

Richard J. Sandberg, Manager
Air Quality Permits Section
Industrial Division

for Sheryl A. Corrigan
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

Table C: *not used in this permit*

Appendix A: *not used in this permit*

Appendix B: Insignificant Activities

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. chs. 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. Subject to the limitations of Minn. R. 7007.1800 and 7017.0100, subp. 2, 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.

FACILITY DESCRIPTION:

Avtec Finishing Systems is a metal finishing job shop. The primary finishes offered are anodizing, chemical film, electropolish, black oxide, and electroless nickel. Customers are primarily in the aerospace, electronics, and other commercial industries.

The facility consists of a degreaser, 11 plating/anodizing lines, and some insignificant activities. Of the approximately 85 individual baths making up the plating/anodizing lines, over half of them are insignificant activities based on the quantity of emissions generated. However, all are included in the body of the permit, and the facility potential emissions include all baths, whether or not they are considered insignificant.

The permit action is a Part 70 operating permit. The permit is a major source of HAP, and is subject to the NESHAP for Halogenated Solvent Cleaning.

TABLE A: LIMITS AND OTHER REQUIREMENTS

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 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
OPERATIONAL REQUIREMENTS	hdr
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
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
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
Inspections: The Permittee shall comply with the inspection procedures and requirements as found in Minn. R. 7007.0800, subp. 9(A).	Minn. R. 7007.0800, subp. 9(A)
The Permittee shall comply with the General Conditions listed in Minn. R. 7007.0800, subp. 16.	Minn. R. 7007.0800, subp. 16
PERFORMANCE TESTING	hdr
Performance Testing: Conduct all performance tests in accordance with Minn. R. ch. 7017 unless otherwise noted in Tables A and/or B.	Minn. R. ch. 7017
<p>Performance Test Notifications and Submittals:</p> <p>Performance Tests are due as outlined in Tables A and B of the permit. See Table B for additional testing requirements.</p> <p>Performance Test Notification (written): due 30 days before each Performance Test Performance Test Plan: due 30 days before each Performance Test Performance Test Pre-test Meeting: due 7 days before each Performance Test Performance Test Report: due 45 days after each Performance Test Performance Test Report - Microfiche Copy: due 105 days after each Performance Test</p> <p>The Notification, Test Plan, and Test Report may be submitted in alternative format as allowed by Minn. R. 7017.2018.</p>	Minn. Rs. 7017.2030, subp. 1-4, 7017.2018 and Minn. R. 7017.2035, subp. 1-2
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
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)
RECORDKEEPING	hdr

TABLE A: LIMITS AND OTHER REQUIREMENTS

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Record keeping: 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)
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)
REPORTING/SUBMITTALS	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
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
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)
Emission Fees: due 60 days after receipt of an MPCA bill.	Minn. R. 7002.0005 through Minn. R. 7002.0095
Emission Inventory Report: due on or before April 1 of each calendar year following permit issuance. To be submitted on a form approved by the Commissioner.	Minn. R. 7019.3000 through Minn. R. 7019.3100

TABLE A: LIMITS AND OTHER REQUIREMENTS

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 001 A-Line: Nickel 1**Associated Items:** EU 010 Nickel 1 Soak Cleaner

EU 011 Nickel 1 Hydrochloric Acid

EU 012 Nickel 1 Medium Phosphorus Electroless Nickel

EU 013 Nickel 1 High Phosphorus Electroless Nickel

EU 014 Nickel 1 Nitric Acid

EU 015 Nickel 1 Nitric Acid

EU 016 Nickel 1 Teflon Nickel Plate

EU 017 Nickel 1 Nitric Acid

EU 018 Nickel 2 Wood's Nickel Strike

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. Combined PTE of all equipment in GP001 is 1.1 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 002 B-Line: Nickel 2

- Associated Items:** EU 002 Nickel 2 Acid Etch
 EU 003 Nickel 2 Deoxidizer
 EU 004 Nickel 2 50% Nitric Acid
 EU 005 Nickel 2 Zincate
 EU 006 Nickel 2 Medium Phosphorus Electroless Nickel
 EU 007 Nickel 2 High Phosphous Electroless Nickel
 EU 008 Nickel 2 Nitric Acid
 EU 009 Nickel 2 Nitric Acid

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. Combined PTE of all equipment in GP002 is 3.79 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 003 C-Line: Nickel 3

- Associated Items:**
- EU 019 Nickel 3 Soak Cleaner
 - EU 020 Nickel 3 Hydrochloric Acid
 - EU 021 Nickel 3 Hydrochloric Acid
 - EU 022 Nickel 3 Medium Phosphorus Electroless Nickel
 - EU 023 Nickel 3 Nitric Acid Strip
 - EU 024 Nickel 3 Nitric Acid Strip
 - EU 025 Nickel 3 Chromate
 - EU 026 Nickel 3 Nickel Stripper
 - EU 027 Nickel 3 Nickel Stripper

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. Combined PTE of all equipment in GP003 is 0.32 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 004 D-Line: Zinc Diecast Chromate

- Associated Items:** EU 028 Zinc Diecast Chromate Alkaline Zinc
 EU 029 Zinc Diecast Chromate Steel Soak
 EU 030 Zinc Diecast Chromate HCl
 EU 031 Zinc Diecast Chromate Clear Chromate
 EU 032 Zinc Diecast Chromate Black Chromate
 EU 033 Zinc Diecast Chromate DC-1
 EU 034 Zinc Diecast Chromate Yellow Chromate

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. Combined PTE of all equipment in GP004 is 0.03 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 005 E-Line: Electropolish**Associated Items:** EU 035 Electropolish Soak Cleaner

EU 036 Electropolish

EU 037 Electropolish Nitric Acid

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. Combined PTE of all equipment in GP005 is 0.45 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 006 F-Line: Nickel 4

- Associated Items:**
- EU 038 Nickel 4 Steel Soak Cleaner
 - EU 039 Nickel 4 Brass Soak Cleaner
 - EU 040 Nickel 4 Zinc Bright Dip
 - EU 041 Nickel 4 Copper Plate
 - EU 042 Nickel 4 Medium Phosphorus Electroless Nickel
 - EU 043 Nickel 4 Nitric Acid
 - EU 044 Nickel 4 Teflon Nickel Plate

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. Combined PTE of all equipment in GP006 is 0.5 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 007 G-Line: Hand Chromate

Associated Items: EU 045 Hand Chromate Soak Cleaner
 EU 046 Hand Chromate Desmutter
 EU 047 Hand Chromate Deoxidizer
 EU 048 Hand Chromate Yellow Chromate
 EU 049 Hand Chromate Clear Chromate
 EU 050 Hand Chromate Yellow Chromate
 EU 051 Hand Chromate Deoxidizer

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. Combined PTE of all equipment in GP007 is 0.35 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 008 I-Line: Black Oxide Line

- Associated Items:** EU 052 Black Oxide Line Soak Cleaner
 EU 053 Black Oxide Line Soak Cleaner
 EU 054 Black Oxide Line Hydrochloric Acid
 EU 055 Black Oxide Line Oil
 EU 056 Black Oxide Line Dry Oil Drip Station
 EU 057 Black Oxide Line Dry Oil
 EU 058 Black Oxide Line Chromic Acid

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. Combined PTE of all equipment in GP008 is less than 0.01 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 009 J-Line: Barrel Zinc Line

Associated Items: EU 059 Barrel Zinc Line Electocleaner
 EU 060 Barrel Zinc Line Hydrochloric Acid Pickle
 EU 061 Barrel Zinc Line Zinc Generator
 EU 062 Barrel Zinc Line Zinc Plate
 EU 063 Barrel Zinc Line Clear Chromate
 EU 064 Barrel Zinc Line Yellow Chromate
 EU 065 Barrel Zinc Line Black Chromate

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. Combined PTE of all equipment in GP009 is 0.01 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc
 Permit Number: 05300319 - 001

Subject Item: GP 010 K-Line: Hardcoat/Chromate Line

- Associated Items:** EU 066 Hardcoat/Chromate Line Purple Dye
 EU 067 Hardcoat/Chromate Line Olive Drab Dye
 EU 068 Hardcoat/Chromate Line Bronze Dye
 EU 069 Hardcoat/Chromate Line Inside Gold Dye
 EU 070 Hardcoat/Chromate Line Chromate
 EU 071 Hardcoat/Chromate Line Chromate
 EU 072 Hardcoat/Chromate Line Deoxidizer
 EU 073 Hardcoat/Chromate Line Nickel Seal
 EU 074 Hardcoat/Chromate Line Black Dye
 EU 075 Hardcoat/Chromate Line Nitric
 EU 076 Hardcoat/Chromate Line Hardcoat Bath

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. Combined PTE of all equipment in GP010 is 0.74 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: GP 011 L-Line: Anodize Line

- Associated Items:**
- EU 077 Anodize Line Deoxidizer
 - EU 078 Anodize line Nickel Seal
 - EU 079 Anodize Line Black Dye
 - EU 080 Anodize Line Nitric
 - EU 081 Anodize Line Anodize Bath
 - EU 082 Anodize Line Red Dye
 - EU 083 Anodize Line Outside Gold Dye
 - EU 084 Anodize Line Blue Dye
 - EU 085 Anodize Line Green Dye
 - EU 086 Anodize Line Small Cleaner

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. Combined PTE of all equipment in GP011 is 1.25 lb/hr.	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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

Subject Item: EU 001 Degreaser

Associated Items: SV 001 Degreaser Roof Vent

What to do	Why to do it
EMISSION LIMITS/CONTROL REQUIREMENTS	hdr
<p>Each cleaning machine shall be designed or operated to meet the control equipment or technique requirement of (1) or (2) below:</p> <p>(1) An idling and downtime mode cover, as described in 40 CFR Section 63.463(d)(1)(i), that may be readily opened or closed, that completely covers the cleaning machine openings when in place, and is free of cracks, holes, or other defects.</p> <p>(2) A reduce droom draft as described in 40 CFR Section 63.463(e)(2)(ii).</p>	40 CFR Section 63.463(a)(1); Minn. R. 7011.7200
The degreaser shall have a freeboard ratio of 0.75 or greater.	40 CFR Section 63.463(a)(2); Minn. R. 7011.7200
The degreaser shall have an automated parts handling system capable of moving parts or parts baskets at a speed of 3.4 meters per minute (11 feet per minute) or less from the initial loading of parts through removal of cleaned parts.	40 CFR Section 63.463(a)(3); Minn. R. 7011.7200
The degreaser shall be equipped with a device that shuts of the sump heat if the sump liquid solvent level drops to the sump heater coil (does not apply to a vapor cleaning machine that uses steam to heat the solvent).	40 CFR Section 63.463(a)(4); Minn. R. 7011.7200
The 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.	40 CFR Section 63.463(a)(5); Minn. R. 7011.7200
The degreaser shall have a primary condenser.	40 CFR Section 63.463(a)(6); Minn. R. 7011.7200
Use the following control combination: Option 4: freeboard ratio of 1.0. reduced room draft, superheated vapor.	40 CFR Section 63.463(b)(2)(i); Minn. R. 7011.7200
<p>Control air distrubances across the degreaser by incorporating the control requirement or techniques in item (i) or (ii):</p> <p>(i) Cover(s) 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.</p> <p>(ii) A reduced room draft as described in 40 CFR Section 63.463(e)(2)(ii).</p>	40 CFR Section 63.463(d)(1); Minn. R. 7011.7200
The parts baskets or the parts being cleaned in an open-top batch vapor cleaning machine shall not occupy more than 50 percent of the solvent/air interface area unless the parts baskets or parts are introduced at a speed of 0.9 meters per minute (3 feet per minute) or less.	40 CFR Section 63.463(d)(2); Minn. R. 7011.7200
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); Minn. R. 7011.7200
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 by the Administrator.	40 CFR Section 63.463(d)(4); Minn. R. 7011.7200
Parts baskets or parts shall not be removed from any solvent cleaning machine until dripping has stopped.	40 CFR Section 63.463(d)(5); Minn. R. 7011.7200
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); Minn. R. 7011.7200
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); Minn. R. 7011.7200
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); Minn. R. 7011.7200
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 Administrator's satisfaction to achieve the same or better results as those recommended by the manufacturer.	40 CFR Section 63.463(d)(9); Minn. R. 7011.7200
Each operator of a solvent cleaning machine shall complete and pass the applicable sections of the test of solvent cleaning procedures in appendix A to 40 CFR Section 63, Subpart T, if requested during an inspection by the Administrator.	40 CFR Section 63.463(d)(10); Minn. R. 7011.7200

TABLE A: LIMITS AND OTHER REQUIREMENTS

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

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); Minn. R. 7011.7200
Sponges, fabric, wood, and paper products shall not be cleaned in the degreaser.	40 CFR Section 63.463(d)(12); Minn. R. 7011.7200
OPERATING REQUIREMENTS	hdr
Conduct monitoring of each control device used to comply with 40 CFR Section 63.463 of this subpart as provided in 40 CFR Section 63.466.	40 CFR Section 63.463(e)(1); Minn. R. 7011.7200
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 as measured using the procedures in 40 CFR Section 63.466(d) An exceedance has occurred if this requirement is not met and is not corrected within 15 days of detection. Adjustments or repairs shall be made to reestablish required temperature. The temperature shall be remeasured immediately upon adjustment or repair and demonstrated to meet the requirement.	40 CFR Section 63.463(e)(2)(ii)(A); 40 CFR Section 63.463(e)(3)(ii); Minn. R. 7011.7200
Establish and maintain the operating conditions under which the wind speed was determined to be 50 feet per minute or less as described in 40 CFR Section 63.466(d). An exceedance has occurred if this requirement is not met.	40 CFR Section 63.463(e)(2)(ii)(B); 40 CFR Section 63.463(e)(3)(ii); Minn. R. 7011.7200
Ensure that the temperature of the solvent vapor at the center of the superheated vapor zone is at least 10 degrees F above the solvent's boiling point. An exceedance has occurred if this requirement is not met and is not corrected within 15 days of detection. Adjustments or repairs shall be made to reestablish required temperature. The temperature shall be remeasured immediately upon adjustment or repair and demonstrated to meet the requirement.	40 CFR Section 63.463(e)(2)(vi)(A); 40 CFR Section 63.463(e)(3)(ii); Minn. R. 7011.7200
Ensure that the manufacturer's specifications for determining the minimum proper dwell time within the superheated vapor system is followed. An exceedance has occurred if this requirement is not met.	40 CFR Section 63.463(e)(2)(vi)(B); 40 CFR Section 63.463(e)(3)(ii); Minn. R. 7011.7200
Ensure that parts remain within the superheated vapor for at least the minimum proper dwell time. An exceedance has occurred if this requirement is not met.	40 CFR Section 63.463(e)(2)(vi)(C); 40 CFR Section 63.463(e)(3)(ii); Minn. R. 7011.7200
MONITORING REQUIREMENTS	hdr
Weekly Monitoring: Use a thermometer or thermocouple to measure the temperature at the center of the superheated solvent vapor zone while the solvent cleaning machine is in the idling mode.	40 CFR Section 63.466(a)(2); Minn. R. 7011.7200
Monthly Monitoring - Reduced Room Draft: Conduct a monthly visual inspection of the enclosure to determine if it is free of cracks, holes and other defects.	40 CFR Section 63.466(d)(2); Minn. R. 7011.7200
Conduct an initial monitoring test and monthly monitoring tests thereafter, of the windspeed within the enclosure using the procedure specified in (i) and (ii) below. (i) Determine the direction of the wind current in the enclosure by slowly reotating a velometer inside the entrance to the enclosure until the maximum speed is located. (ii) Record the maximum wind speed.	40 CFR Section 63.466(d)(2); Minn. R. 7011.7200
RECORDKEEPING REQUIREMENTS	hdr
Maintain the following records in written or electronic form for the lifetime of the degreaser: - Owner's manuals, or if not available, written maintenance and operating procedures, for the solvent cleaning machine and control equipment. - The date of installation for the solvent cleaning machine and all of its control devices. - Records of the halogenated HAP solvent content for each solvent used in the degreaser.	40 CFR Section 63.467(a)(1), (2), and (5); Minn. R. 7011.7200

TABLE A: LIMITS AND OTHER REQUIREMENTS

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

<p>Maintain the following records in electronic or written form for a period of 5 years:</p> <ul style="list-style-type: none"> - The results of control device monitoring required under 40 CFR Section 63.466. - Information on the actions taken to comply with 40 CFR Section 63.463(e) and (f). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. - Estimates of annual solvent consumption for the degreaser. 	<p>40 CFR Section 63.467(b)(1)-(3); Minn. R. 7011.7200</p>
<p>REPORTING REQUIREMENTS</p>	<p>hdr</p>
<p>Include the following information in the semi-annual or quarterly (as applicable) exceedance report required under Table B:</p> <ul style="list-style-type: none"> - Information on the actions taken to comply with 40 CFR Section 63.463(e). This information shall include records of written or verbal orders for replacement parts, a description of the repairs made, and additional monitoring conducted to demonstrate that monitored parameters have returned to accepted levels. - If an exceedance has occurred, the reason for the exceedance and a description of the actions taken. - If no exceedances of a parameter have occurred, or a piece of equipment has not been inoperative, out of control, repaired, or adjusted, such information shall be stated in the report. 	<p>40 CFR Section 63.463(e)(4); 40 CFR Section 63.468(h); Minn. R. 7011.7200</p>
<p>An owner or operator who is required to submit an exceedance report on a quarterly (or more frequent) basis may reduce the frequency of reporting to semiannual if the following conditions are met:</p> <ul style="list-style-type: none"> - The source has demonstrated a full year of compliance without an exceedance. - The owner or operator continues to comply with all relevant recordkeeping and monitoring requirements specified subpart A (General Provisions) and in this subpart. - The Administrator does not object to a reduced frequency of reporting for the affected source as provided in paragraph (e)(3)(iii) of subpart A (General Provisions). 	<p>40 CFR Section 63.468(i); Minn. R. 7011.7200</p>

TABLE B: SUBMITTALS

12/05/05

Facility Name: Avtec Finishing Systems Inc
Permit Number: 05300319 - 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:

AQ Permit Technical Advisor
Industrial 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:

AQ Compliance Tracking Coordinator
Industrial 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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 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

12/05/05

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319 - 001

What to send	When to send	Portion of Facility Affected
Report	due 30 days after end of each calendar half-year starting 08/09/2001 (Exceedance Report), unless the Administrator determines on a case-by-case basis that more frequent reporting is necessary to accurately assess the compliance status of the source or, an exceedance occurs. Once an exceedance has occurred, follow a quarterly reporting format until a request to reduce reporting frequency under 40 CFR Section 63.468 (i) is approved. The exceedance report shall include the applicable information described in Table A, Subject Item EU001, under the subheading "REPORTING REQUIREMENTS."	EU001
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. If no deviations have occurred, the Permittee shall submit the report stating no deviations.	Total Facility
Annual Report	due 32 days after end of each calendar year starting 08/09/2001, to include the following information: - A signed statement from the facility owner or his designee stating that "All operators of solvent cleaning machines have received training on the proper operation of solvent cleaning machines and their control devices sufficient to pass the test required in 40 CFR Section 63.463(d)(10)." - An estimate of solvent consumption for each solvent cleaning machine during the reporting period.	EU001
Compliance Certification	due 30 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 US EPA regional office in Chicago. This report covers all deviations experienced during the calendar year.	Total Facility

APPENDIX B - Insignificant Activities

Facility Name: Avtec Finishing Systems Inc

Permit Number: 05300319-001

Insignificant Activities and Applicable Requirements

Minn. R. 7007.1300, subpart	Rule Description of the Activity	Likely Applicable Requirement
3(G)	Emissions from a laboratory, as defined in the subpart. <i>Facility operates a laboratory on-site.</i>	Minn. R. 7011.0510/0515, and/or Minn. R. 7011.0610, and/or Minn. R. 7011.0710/0715
3(H)	Miscellaneous:	
	3. brazing, soldering or welding equipment; <i>Facility operates welding equipment as part of maintenance activities.</i>	Minn. R. 7011.0510/0515, and/or Minn. R. 7011.0610, and/or Minn. R. 7011.0710/0715
	7. cleaning operations: alkaline/phosphate cleaners and associated cleaners and associated burners. <i>Facility operates alkaline/phosphate cleaners.</i>	Minn. R. 7011.0510/0515, and/or Minn. R. 7011.0610, and/or Minn. R. 7011.0710/0715

TECHNICAL SUPPORT DOCUMENT
For
AIR EMISSION PERMIT NO. 05300319-001

This technical support document is intended for all parties interested in the permit and to meet the requirements that have been set forth by the federal and state regulations (40 CFR § 70.7(a)(5) and Minn. R. 7007.0850, subp.1). The purpose of this document is to provide the legal and factual justification for each applicable requirement or policy decision considered in the preliminary determination to issue the permit.

1. General Information

1.1. Applicant and Stationary Source Location:

Applicant/Address	Stationary Source/Address (SIC Code: 3471)
Avtec Finishing Systems, Inc. 9109 Science Center Drive New Hope, MN 55428	9101 Science Center Drive New Hope Hennepin County
Contact: Bradley Hoium Phone: (612) 822-2185	

1.2. Description of the Facility and Permit Action

Avtec Finishing Systems is a metal finishing job shop. The primary finishes offered are anodizing, chemical film, electropolish, black oxide, and electroless nickel. Customers are primarily in the aerospace, electronics, and other commercial industries.

The facility consists of a degreaser, 11 plating/anodizing lines, and some insignificant activities. Of the approximately 85 individual baths making up the plating/anodizing lines, over half of them are insignificant activities based on the quantity of emissions generated. However, all are included in the body of the permit, and the facility potential emissions include all baths, whether or not they are considered insignificant.

The permit action is a Part 70 operating permit. The permit is a major source of HAPs, and is subject to the NESHAP for Halogenated Solvent Cleaning.

1.3 Description of any Changes Allowed with this Permit Issuance

No changes are authorized by this permit.

1.4 Permit History

Permit Number and Issuance Date	Action Authorized
1923-82-I-1, 2/12/82	Installation permit only for new metal finishing facility and air pollution control equipment.

1.5. Facility Emissions:

Table 1. Total Facility Potential to Emit Summary

	PM/PM ₁₀ tpy	NO _x tpy	VOC tpy	Tetrachloro- ethylene tpy	HCl tpy	H ₂ SO ₄ tpy	Metallic HAPs tpy	Total HAPs tpy
Total Facility Potential Emissions	9.8	3.5	55.0	54.2	1.1	4.4	1.4	56.8

Table 2. Facility Classification

Classification	Major/Affected Source	Synthetic Minor	Minor
PSD			X
Part 70 Permit Program	X - HAP		
Part 63 NESHAP	X		

2. Regulatory and/or Statutory Basis

New Source Review

The facility is an existing non-major source under New Source Review regulations. No changes are authorized by this permit.

Part 70 Permit Program

The facility is a major source under the Part 70 permit program, due to potential HAP emissions in excess of 10 tons per year (tpy) for a single HAP and 25 tpy for total HAPs.

New Source Performance Standards (NSPS)

There are no New Source Performance Standards applicable to the operations at this facility.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

The facility's degreaser is subject to 40 CFR 63, Subpart T, National Emission Standards for Halogenated Solvent Cleaning.

None of the plating lines at the facility is subject to 40 CFR 63, Subpart N, National Emission Standards for Chromium Emissions From Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The tanks containing chromium solutions are chrome conversion tanks; no electric current is applied. Therefore, per 40 CFR § 63.340(b), Subpart N does not apply.

Minnesota State Rules

Portions of the facility are subject to Minn. R. 7011.0715, Standards of Performance for Post-1969 Industrial Process Equipment.

Table 3. Regulatory Overview of Facility

EU, GP, or SV	Applicable Regulations	Comments:
EU001	40 CFR §63, Subpart T	National Emission Standards for Halogenated Solvent Cleaning

EU, GP, or SV	Applicable Regulations	Comments:
GP001 – GP011	Minn. R. 7011.0715	Standards of Performance for Pre 1969 Industrial Process Equipment.

3. Technical Information

3.1 Calculations of Potential to Emit

Attachment 1 to this TSD contains calculations of potential to emit from the facility. The calculations for plating operations were done by the Permittee, using the procedures described for plating activities at www.pca.state.mn.us/industry/sbeg/platinst.pdf. These calculations were modified by MPCA staff by multiplying by a safety factor of 1.3, as prescribed at <ftp://files.pca.state.mn.us/pub/sbap/plating.xls>, to reflect that the calculations are based on actual operations. Degreaser calculations were done by the Permittee using the equations prescribed at 40 CFR § 63.465(e).

3.2 Periodic Monitoring

In accordance with the Clean Air Act, it is the responsibility of the owner or operator of a facility to have sufficient knowledge of the facility to certify that the facility is in compliance with all applicable requirements.

In evaluating the monitoring included in the permit, the MPCA considers the following:

- The likelihood of violating the applicable requirements;
- Whether add-on controls are necessary to meet the emission limits;
- The variability of emissions over time;
- The type of monitoring, process, maintenance, or control equipment data already available for the emission unit;
- The technical and economic feasibility of possible periodic monitoring methods; and
- The kind of monitoring found on similar units elsewhere.

Table 4 summarizes the periodic monitoring requirements for those emission units for which the monitoring required by the applicable requirement is nonexistent or inadequate.

Table 4. Periodic Monitoring

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
EU001	Work practices as defined in 40 CFR 63, Subpart T	None	Assumed that the NESHAP requirements specify adequate monitoring.
GP001 through GP011	PM: variable with based on airflow and/or process weight rate, not to exceed 0.3 gr/dscf (Minn. R.	None	The emissions from the plating lines are not 100% captured and exhausted through a defined stack; a significant portion of the emissions are fugitive in nature and are

Emission Unit or Group	Requirement (basis)	Additional Monitoring	Discussion
	7011.0715) Opacity: < 20 % (Minn. R. 7011.0715)		exhausted directly to room air, assumed to eventually escape the building through doors and other openings. See Table 5 for additional information.

Table 5: Comparison of PTE and IPER Limits

Group	PM PTE (lb/hr)	Associated Stack(s)	IPER limit (lb/hr)
GP001	0.2	SV002	13.6
GP002	0.66	SV002	13.6
GP003	0.07	SV003	11.54
GP004	0.00095	Room air	NA
GP005	0.0861	SV003	11.54
GP006	0.1763	SV002	13.6
GP007	0.0471	SV002	13.6
GP008	< 0.01	Room air	NA
GP009	0.0028	SV004	7.62
GP010	0.553	SV005	14.15
		SV006	7.62
GP011	0.437	SV007	7.62

3.3 Insignificant Activities

Avtec Finishing Systems identified several operations as insignificant activities in the permit application. Several of these were lines (as opposed to individual units) listed as insignificant under Minn. R. 7007.1300, subp. 4. While many of the individual baths making up the lines are insignificant under Minn. R. 7007.1300 subparts 3 or 4, they were all included in Table A of the permit, since they are subject to the same requirements (Minn. R. 7011.0715) as those baths which are not insignificant but are part of the same plating or anodizing line. Those individual tanks eligible for classification as an insignificant activity were then marked as such in the facility description portion of Delta, so that they are not included in the emission inventory. However, emissions from all of the tanks are included in the potential to emit of the facility. Table 5 itemizes the individual tanks, indicating which are or not insignificant activities, and why.

Table 5. Insignificant Plating Baths

Emission Unit	Insignificant?	Discussion
EU002, EU004, EU008 - EU010, EU014, EU015, EU019, EU023 – EU036, EU038 – EU040, EU043, EU045 – EU047, EU048 – EU053, EU055 – EU057, EU059, EU061 - EU066, EU068, EU072, EU075, EU077, EU080, EU083, EU086	Yes, under Minn. R. 7007.1300, subp. 3(I)	Potential emissions are <2 tpy of CO, and <1 tpy of PM, PM ₁₀ , SO ₂ , NO _x , and VOC; no HAPs

Emission Unit	Insignificant?	Discussion
EU003, EU076, EU081	Yes, under Minn. R. 7007.1300, subp. 4(B)	Potential emissions are <2.28 lb/hr for PM, PM ₁₀ , NO _x , SO ₂ , VOC; no HAPs
EU011, EU018, EU020, EU021, EU041, EU054, EU058, EU060, EU070, EU073, EU078	Yes, under Minn. R. 7007.1300, subp. 4(C)	PM, PM ₁₀ , VOC, SO ₂ , NO _x , and CO emissions are less than all thresholds in Minn. R. 7007.1300 subp. 3(I) and 4(B); Potential HAP emissions are less than 25% of the thresholds in Minn. R. 7007.1300, subp. 5
EU006, EU007, EU012, EU013, EU016, EU022, EU042, EU044, EU067, EU069, EU071, EU074, EU079, EU082, EU084, EU085	No	Potential chromium and/or nickel compounds exceed 25% of the most restrictive thresholds in Minn. R. 7007.1300, subp. 5 (exact compounds not provided, web search indicates that all may be possible in a plating environment)

In addition, there are other activities (not part of plating lines) which were also listed as insignificant activities. These are listed in Appendix B to the permit. The activities identified in Appendix B are subject to general Minnesota Standards of Performance. The activities are not conducive to stack testing procedures, and are not expected to produce emissions approaching the levels allowed by the rules.

3.4 Permit Organization

In general, the permit meets the MPCA Delta Guidance for ordering and grouping of requirements. One area where this permit deviates slightly from Delta guidance is in the use of appendices. While appendices are fully enforceable parts of the permit, in general, any requirement that the MPCA thinks should be tracked (e.g., limits, submittals, etc.), should be in Table A or B. The main reason is that the appendices are word processing sections and are not part of the tracking system. Violation of the appendices can be enforced, but the computer system will not automatically generate the necessary enforcement notices or documents. Staff must generate these.

3.5 Comments Received

Public Notice Period: 10/14/05 – 11/14/05
EPA 45-day Review Period: 10/14/05 – 11/29/05

Comments were not received from the public or EPA during the public notice or EPA review periods.

3.6 Changes Made

Prior to issuance of the permit, it was noticed that two “extra” requirements that should have been removed were still in the permit. The Permittee had initially wanted to comply with Option 3 under 40 CFR § 63.463(b)(2)(i), which includes use of a working mode cover, freeboard refrigeration device, and superheated vapor. Prior to public notice, the Permittee made the decision to switch from Option 3 to Option 4, which calls for a freeboard ration of 1.0, reduced room draft, and superheated vapor. When the changes to the draft permit were made, the initial requirements under 40 CFR § 63.466(a)(1) for freeboard refrigeration and 40 CFR § 63.466(b)(1) for a working-mode cover should have been removed, since they are not applicable under Option 4. Since they weren’t removed at that time, they were removed administratively prior to permit issuance under the provisions of Minn. R. 7007.1400, subp. 1.D.(4): “the requirements are technically incorrect and their elimination does not affect the accuracy of the data generated or of the monitoring information recorded or reported.”

Also prior to permit issuance, the Permittee submitted revised emission calculations. The total facility PTE is actually lower than that public noticed. The change has no effect on applicability of permit regulations or standards of performance.

4. Conclusion

Based on the information provided by Avtec Finishing Systems, Inc., the MPCA has reasonable assurance that the proposed operation of the emission facility, as described in the Air Emission Permit No. 05300319-001 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: Toni Volkmeier (permit writer/engineer)
 Suzanne Venem (enforcement)
 Greg Kvaal (peer reviewer)

Attachments: 1. PTE Summary and Calculation Spreadsheets
 2. Facility Description and CD-01 Forms