

Iowa Department of Natural Resources

Title V Operating Permit Fact Sheet

This document has been prepared to fulfill the public participation requirements of 40 CFR Part 70 and 567 Iowa Administrative Code (IAC) 22.107(6). 40 CFR Part 70 contains operating permit regulations pursuant to Title V of the Clean Air Act.

The Iowa Department of Natural Resources (DNR) finds that:

Construction Products, Inc., located at 1625 NE Broadway Avenue, Des Moines, Iowa 50313, EIQ #: 92-1064, DNR Facility #: 77-01-109 has applied to renew their Title V Operating Permit. The designated responsible official of this facility is Mr. Ben Woline, Assistant Manufacturing Manager.

1. Construction Products, Inc. is a manufacturer of fabricated structural metal (SIC 3441). This facility consists of five (5) significant emission units with potential emissions of:

Pollutant	Abbreviation	Potential Emissions (Tons per Year)
Particulate Matter ($\leq 10 \mu\text{m}$)	PM ₁₀	35.41
Particulate Matter	PM	35.41
Sulfur Dioxide	SO ₂	--
Nitrogen Oxides	NO _x	--
Volatile Organic Compounds	VOC	133.25
Carbon Monoxide	CO	--
Lead	Lead	--
Hazardous Air Pollutants ⁽¹⁾	HAP	111.41

⁽¹⁾ May include the following: Ethyl benzene, Toluene, Xylene (mixed isomers).

2. Construction Products, Inc. submitted a Title V Operating Permit renewal application on June 2, 2010 and any additional information describing the facility on June 28, 2010 and May 30, 2013. Based on the information provided in these documents, DNR has made an initial determination that the facility meets all the applicable criteria for the issuance of an operating permit specified in 567 IAC 22.107.
3. DNR has complied with the procedures set forth in 567 IAC 22.107, including those regarding public notice, opportunity for public hearing, and notification of EPA and surrounding state and local air pollution programs.

DNR procedures for reaching a final decision on the draft permit:

1. The public comment period for the draft permit will run from July 8, 2013 through August 6, 2013. The beginning date of this public comment period also serves as the beginning of the U.S. Environmental Protection Agency's (EPA) 45-day review period, provided the EPA does not seek a separate review period. During this time, anyone may submit written comments on the permit. Mail signed comments to Jeff Gabby at the Polk County address shown below.
2. Written requests for a public hearing concerning the permit may also be submitted during the comment period. Any hearing request must state the person's interest in the subject matter, and the nature of the issues proposed to be raised at the hearing. DNR will hold a public hearing upon finding, on the basis of requests, a significant degree of relevant public interest in a draft permit. Mail hearing requests to Jeff Gabby at the Polk County address shown below.
3. DNR will keep a record of the issues raised during the public participation process, and will prepare written responses to all comments received. The comments and responses will be compiled into a responsiveness summary document. After the close of the public comment period, DNR will make a final decision on the renewal application. The responsiveness summary and the final permit will be available to the public upon request.

Mr. Jeffrey M. Gabby
Polk County Department of Public Works
Air Quality Division
5885 NE 14th Street
Des Moines, Iowa 50313
Phone: (515) 286-3389
E-mail: jeffrey.gabby@polkcountyiowa.gov

DNR concludes that:

1. DNR has authority under 455B.133 Code of Iowa to promulgate rules contained in 567 IAC Chapters 20-35, including, but not limited to, rules containing emission limits, providing for compliance schedules, compliance determination methods and issuance of permits.
2. DNR has the authority to issue operating permits for air contaminant sources and to include conditions in such permits under 455B.134 Code of Iowa.
3. The emission limits included in this permit are authorized by 455B.133 Code of Iowa and 567 IAC Chapters 20-35.
4. DNR is required to comply with 567 IAC Chapter 22 in conjunction with issuing a Title V Operating Permit.
5. The issuance of this permit does not preclude the DNR from pursuing enforcement action for any violation.

Applicant: Construction Products, Inc.

Review Engineer:

EIQ Number: 92-1064

Jeff Gabby

Facility File Number: 77-01-109

Application Evaluation

A. Project Briefing:

This project regards a Part 70 Title V permit renewal application to operate (5) significant paint booths. Conditions transfer into the Title V Operating Permit from the following Polk County Construction Permits: i) 0892, issued September 9, 1996 for a Paint Booth, Bay 4, with Water Wash Curtain, (EU 1 /CE 1 / EP 1); ii) 0893, issued September 11, 1996 for a Paint Booth, Bay 5, with Water Wash Curtain, (EU 2/ CE 2 / EP 2 & 4); iii) 0559, issued November 6, 1990 for (2) Overhead Paint Booths with No Pump Water Wash Curtains, (EU 3, 4/ CE 3, CE 4 / EP 3), and iv) 1283 Modified, issued August 18, 2005, for a Down Draft Paint Booth, Bay 11 with Water Wash Pit, (EU 15 / CE 11 / EP 11, EP 12).

(1) 150 Gallon Gasoline Storage Tank, (1) 320 Gallon Diesel Fuel Storage Tank, (24) 250,000 BTU/Hr. Space Heaters, (149) pulse welders, are insignificant, per 567 IAC 22.103.

B. Applicable rules and regulations:

1. Emission limits and conditions: see Polk County Construction Permits 0892 for Bay 4 Paint Booth (EU 1 / CE 1 / EP 1), 0893 for Bay 5 Paint Booth (EU 2 / CE 2 / EP 2, 4), 0559 for Overhead Paint Booths 1 and 2 (EU 3, 4 / CE 3, 4 / EP 3), and 1283 Modified for Down Draft Paint Booth, Bay 11 with Water Wash Pit, (EU 15 / CE 11 / EP 11, EP 12).
2. Opacity for the facility: Less than 20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. Polk County Construction Permit 0892 limits opacity for Bay 4 Paint Booth to no visible emissions allowed. Polk County Construction Permit 0893 limits opacity for Bay 5 Paint Booth to no visible emissions allowed. Polk County Construction Permit 1283 Modified for Down Draft Paint Booth, Bay 11 with Water Wash Pit, (EU 15 / CE 11 / EP 11, EP 12) to no visible emissions.
3. NSPS: Not applicable at this time.
4. NESHAP: Surface Coating of Miscellaneous Metal Parts, Subpart M MMM, defines the facility as an existing source with a compliance date deadline of January 2, 2007. The facility has been sent a Polk County letter dated May 16, 2005, which explains the compliance options. The current Polk County Construction permits which the facility has been issued, (Polk County 0559, 0892, 0893, and 1283 Modified), pre-date Subpart M MMM and do not have the requirements of Subpart M MMM. The facility has chosen the compliant material compliance option. The applicable requirements of this option have been placed in the Title V Permit, Plant-Wide Conditions. The web-link to NESHAP Subpart M MMM has been placed in the Title V Permit, Appendix A.
5. PSD: Source is minor (PSD) and will need to submit a PSD permit application only if a PSD qualifying change is made, i.e., applying for a PSD pollutant increase greater than 250 TPY.
6. NAAQS: Facility is located in an attainment area. Air modeling is not required at this time.
7. Title IV: Not applicable.

8. Stratospheric ozone: the only ozone depleting chemicals (regulated by 40 CFR 82) at the facility are those used for air conditioning. 40 CFR 82, Subpart F, applies to the disposal of appliances containing Class I or Class II substances (i.e. air conditioners).
9. PM-10: Polk County Construction Permit 0892 limits PM-10 for Bay 4 Paint Booth to 13.14 TPY.
 Polk County Construction Permit 0893 limits PM-10 for Bay 5 Paint Booth to 13.14 TPY.
 Polk County Construction Permit 0559 limits PM-10 for Overhead Paint Booths 1 & 2 to 0.01 gr./ dscf and 5,256 hr./ yr.. In TPY this equals:

$$(0.01 \text{ gr./ dscf})(19,200 \text{ cf/min})(60 \text{ min/ hr})(1 \text{ lb./ 7,000 gr})(1 \text{ ton/ 2,000 lb.})(5,256 \text{ hr./ yr})$$

$$= 4.32 \text{ TPY}$$

Polk County Construction Permit 1283 Modified limits PM-10 for the Down Draft Paint Booth, Bay 11 with Water Wash Pit, (EU 15 / CE 11 / EP 11, EP 12) to 4.81 TPY.

C. Compliance Assurance and Monitoring consideration:

PM-10:

EP 3/ EU 3 &4/ CE 3 & 4, and EP 11 & 12/ EU 15/ CE 11 have Potentials To Emit which indicate they are uncontrolled Significant for PM-10, as well as controlled Minor. Under DNR's Monitoring Guidance Policy, a Facility O&M Plan and no stack tests are required.

(EU 1 / CE 1 / EP 1), [Paint Booth, Bay 4]; and (EU 2 / CE 2 / EP 2 and 4), [Paint Booth, Bay 5], each have Potentials To Emit that indicate they are uncontrolled Major for PM-10, and controlled Minor. CAM plans are required for EU 1 and EU 2, per 40 CFR 64.2. CAM Plans were requested, received, modified, and placed into the Title V permit. The plans call for daily measurements and recording of the water wash curtains' water level, in order to ensure that their water levels do not fall below the 18" point beneath the grates. This check will monitor that the water curtains remain operational.

Opacity:

EP1/ EU1/ CE1, EP2 & 4/ EU2/ CE 2, and EP 11 & 12/ EU 15/ CE 11 all have "no visible emissions" opacity requirements. They will be required to have the EPs checked once a week for visible emissions, while the EU is operating. Record keeping and immediate corrective action will be required, if any visible emissions are observed.

EP 3/ EU 3 &4/ CE 3 & 4 has < 20% opacity- Polk County Board of Health Rules and Regulations: Chapter V, Article IV, Section 5-9. EP 3 will be required to be checked once a week for visible emissions, while EU 3 and 4 are operating. Record keeping and immediate corrective action will be required, if any visible emissions are observed. Corrective action will include performing an EPA Method 9 opacity reading within 8 hours of the initial observation. If the EPA Method 9 reading is equal to or greater than 20% opacity, this is a violation and corrective action will be taken within 8 hours of the violation.

VOC:

EP1/ EU1/ CE1; EP 2 & 4/ EU2/ CE 2; EP 3/ EU 3 &4/ CE 3 & 4; and EU 15 / CE 11 / EP 11 & 12 are each uncontrolled Minor and do not have short term applicable requirements. Compliance with long term limits is demonstrated by operating limits and recordkeeping requirements. Under DNR's Monitoring Guidance Policy, no additional monitoring is required.

HAPs:

EP1/ EU1/ CE1; EP 2 & 4/ EU2/ CE 2; and EP 3/ EU 3 &4/ CE 3 & 4 all have PTEs that indicate they are uncontrolled major for HAPs, but their construction permits do not have any short term HAP limits. Polk County Construction Permits 0892, 0893, and 0559 Reporting & Record keeping requirements ensure compliance with the HAP limits for these EPs. Under DNR's Monitoring Guidance Policy, no additional monitoring is required. NESHAP Subpart M MMM, Surface Coating of Miscellaneous Metal Parts, requires that the paint booths not exceed 2.6 lb HAP/gal coating solids. It requires the record keeping and reporting to comply with this limit.

(EU 15 / CE 11 / EP 11 & 12) is uncontrolled minor for HAPs, and the construction permit doesn't have a short term HAP limit. Polk County Construction Permit 1283 Modified's Reporting & Record keeping requirements ensure compliance with the HAP limits for EPs 11 and 12. Under DNR's Monitoring Guidance Policy, no additional monitoring is required. NESHAP Subpart M MMM, Surface Coating of Miscellaneous Metal Parts, requires that the paint booth not exceed 2.6 lb HAP/gal coating solids. It requires the record keeping and reporting to comply with this limit.

GHGs:

Significant EUs at the facility do not have GHG PTE. Insignificant EUs' GHG PTE was not calculated, since they are insignificant.

D. Facility Proposed Limits:

In a letter dated April 8, 1997, the facility requests a limit of 17.52 TPY of Toluene, to be split equally between EP1/ EU1/ CE1 and EP2 & 4/ EU2/ CE 2, for booth clean up purposes. Both EU 1 and EU 2 Paint Booths have been limited to 8.76 TPY Toluene emissions.

E. Responsible Official: Mr. Ben Woline, Assistant Manufacturing Manager, is in charge of a principle business function, that of making products for Construction Products, Inc.'s plant to sell and make profit. He makes key decisions for the facility. He meets the definition of Responsible Official found in 567 IAC 22.100(455B).