

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Raleigh Regional Office
County: Orange
NC Facility ID: 6800058
Inspector's Name: Brian Bland
Date of Last Inspection: 04/13/2006
Compliance Code: W/In Violation W/regard To Proc Compliance

Facility Data			Permit Applicability (this application only)
Applicant (Facility's Name): AKG of America Inc Facility Address: AKG of America Inc 7315 Oakwood Street Extension Mebane, NC 27302 SIC: 3499 / Fabricated Metal Products, Nec NAICS: 332999 / All Other Miscellaneous Fabricated Metal Product Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V			SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other:
Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	Application Number: 6800058.06A Date Received: 12/27/2005 Application Type: Last MACT/Toxics Application Schedule: TV- State Only Existing Permit Data Existing Permit Number: 06071/T10 Existing Permit Issue Date: 07/14/2006 Existing Permit Expiration Date: 09/30/2006
Pat McAlinn Manager (919) 563-4286 7315 Oakwood Street Extension Mebane NC, 27302	Rick White President (919) 304-1313 7315 Oakwood Street Extension Mebane NC, 27302	Pat McAlinn Manager (919) 563-4286 7315 Oakwood Street Extension Mebane NC, 27302	
Review Engineer: Ken Babb Review Engineer's Signature:		Date: October 26, 2006	Comments / Recommendations: Issue 06071/T11 Permit Issue Date: Permit Expiration Date:

1. Purpose of Application

This revision is a renewal of an existing Title V permit pursuant to 2Q .0513. The existing Title V permit (04899T08) was issued on July 14, 2006 and was scheduled to expire on September 30, 2006. The renewal application was received at least nine months prior to the expiration date. Therefore, the existing permit shall not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.

2. Facility Description

AKG manufactures aluminum heat exchangers for use in heavy machinery and construction equipment. Sheets of aluminum are received at the facility, cut to product specifications, and welded into the required shapes. After cutting and welding the aluminum, the facility brazes & cleans the heat exchangers in one of two separate production lines. The older production line involves a salt brazing process followed by a series of cleaning tanks to remove all the salt from the product. In the newer process line, the aluminum products are first cleaned in a vapor degreaser, which utilizes

perchloroethylene as the cleaning solvent, and then the parts are vacuum brazed. The vapor degreaser requires no secondary cleaning of the aluminum, but is subject to 40 CFR 63 National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements. After being brazed, the heat exchangers are treated, formed, and painted prior to being shipped to customers. The facility currently employs about 240 people.

3. **Application Chronology**

December 29, 2005 - Air permit application was received by the Division of Air Quality (DAQ), Raleigh Central Office (RCO). Permit application was considered complete as of March 14, 2005.

4. **Permit Modification/Changes**

Previously the pre-heater and CAB brazing furnace (ID No. ES10) was added to the permit. Also the emission factor for hydrogen fluoride (HF) emissions used in determining compliance with the toxics limit was adjusted. Other than removing the Part II section for the brazing furnace and dealing with last MACT issues (see below) no changes need to be made to the permit at this time.

5. **Regulatory Review**

The facility is subject to the following regulations:

40 CFR Part 63 Subpart T: National Emissions Standards for Halogenated Solvent Cleaning
2D .1100 Control of Toxic Air Pollutants
15A NCAC 2Q .0700 Control of Toxic Air Pollutants

However, no regulatory review is required at this time since there are no new applicable regulations for this permit revision (renewal).

6. **NSPS, NESHAPS, PSD, Attainment Status, 112(r), CAM**

NSPS

New Source Performance Standards (NSPS) do not apply to this facility.

NESHAP/MACT

This facility is currently subject to a National Emission Standards for Hazardous Air Pollutants (NESHAP): Subpart T: National Emissions Standards for Halogenated Solvent Cleaning.

PSD

This facility is not a major Prevention of Significant Deterioration (PSD) source.

Attainment Status

This facility is located in Orange County which is in non-attainment for ozone according to the NC DAQ website.

112(r)

This facility is not subject to Section 112(r) of the Clean Air Act requirements because it does not store any of the regulated substances in quantities above the thresholds in the Rule.

CAM

Compliance Assurance Monitoring (CAM) (40 CFR Part 64) does not apply because no source at the facility would be major if uncontrolled.

7. Facility Wide Air Toxics

NC toxics has been triggered at this facility for perchloroethylene and HF. The facility has experienced numerous exceedances of its HF limits. After submission of further information concerning the HF emission factor used in determining compliance with toxics, a lower emission factor has been determined to be appropriate to be used in these calculations. This change should result in a drastic reduction in exceedances by the facility.

Also Subpart T appears to be the last MACT applicable to the facility. Although there has been some confusion, it appears that the facility has thus far failed to submit a last MACT application. Therefore an add info letter has also been submitted to the facility so that this question can be resolved before the permit is ready for final issuance. Because last MACT is a state-only issue, it does not need to be resolved before the permit goes to public notice.

8. Facility Compliance Status

On April 13, 2006, Brian Bland contacted Mr. Pat McAlinn, Manager, and conducted an unannounced, targeted, compliance inspection of AKG. The inspection documented ongoing problems with HF exceedances. The recently issued permit changing the emission factor should significantly reduce these exceedances and bring the facility into compliance..

9. Statement of Compliance

The DAQ has reviewed the compliance status of this facility. Based on the latest inspection, the facility was in compliance with all applicable requirements. The applicant has certified that the facility will be in compliance with all applicable requirements at the time of permit issuance and will continue to comply with these requirements. The applicant has also certified that the facility will be in compliance with any applicable requirements taking effect during the term of the permit and will meet such requirements on a timely basis.

10. Facility Emissions Review

There is no change in emissions for this renewal.

11. Stipulation Review

All stipulations are standard for this type of facility.

12. Public Notice / EPA and Affected State Review

Pursuant to 2Q. 0521, a notice of the draft Title V Permit will be placed in a newspaper of general circulation in the area where the facility is located. The notice provided for a 30 day comment period, with an opportunity for a public hearing. Copies of the public notice will be sent to persons on the Title V mailing list and EPA. Pursuant to 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant will be provided to EPA. Also pursuant to 2Q .0522, a notice of the draft Title V Permit will be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above. There are no affected States for this facility.

13. Conclusions, Comments, and Recommendations

A professional engineer's seal was not required for this renewal.
A consistency determination was not required for this renewal.
RRO recommends issuance of the permit.
RCO recommends issuance of the permit.